

Site Allocation Plan Main Modifications 2017 - Consultation Responses

Document Section		1. General comments	
Respondent Name	Comment ID	Comment	Attached documents
Backwell Parish Council	1013153//1	<p>The Parish Council met last week and passed the following resolution:</p> <p>Backwell Parish Council supports the NSC Site Allocations Plan Proposed Modifications</p>	
Natural England	1018753//1	<p>Planning consultation: North Somerset Site Allocations Plan - Main Modifications Consultation</p> <p>Thank you for your consultation on the above dated 18 September 2017 which was received by Natural England on the same date.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>European designated sites</p> <p>We have reviewed the proposed modifications to the Site Allocations Plan and while some changes are welcome we are concerned about its potential to result in adverse effects on the North Somerset & Mendip Bats Special Area of Conservation (SAC) and</p>	






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		<p>on the Severn Estuary Special Area of Conservation (SAC) and Special Protection Area (SPA).</p> <p>We consider that our concerns can be addressed by further modifications to the Plan; however there is a risk that the current wording of the Plan is not sound or legally compliant.</p> <p>The following comments relate to the Schedule to Policy SA 1 Proposed large sites for residential development (over 10 dwellings):</p> <p>Nailsea: Land at Youngwood Lane; Land at North West Nailsea; Land at Engine Lane</p> <p>The plan proposes to allocate land at Youngwood Lane, in addition to land at Engine Lane and North West Nailsea and other smaller allocations. While we welcome the site specific details/notes for land at Youngwood Lane, which we understand will require <i>‘Ecological issues to be addressed on a strategic basis as part of any future wider development’</i> we consider the need for a strategic approach to addressing ecological issues applies equally to land at Engine Lane and Northwest Nailsea.</p> <p>Birnbeck Pier</p> <p>The site specific details/notes advise that <i>‘should development take place on the island it will need to take account of the sensitivity of the location and the need for suitable mitigation measures’</i>. While this is welcome; Birnbeck Pier and Environs (as shown on the emerging policies map) is immediately adjacent to the Severn Estuary and the need to take account of the sensitivity of the location and for suitable mitigation measures will apply to development here as well on the island itself.</p>	


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		<p>Natural England recommends that the site specific details/notes for the above sites are amended as described, in order to provide sufficient confidence that significant effects on European Sites will not occur as a result of the Plan.</p>	
Wrington Parish Council	1019201//1	<p>This is a comment by Wrington Parish Council (the Council) in response to a public consultation on proposed modifications to the Site Allocations Plan issued by NSC 18 September 2017.</p> <p>We have considered the various proposed amendments, including the Main (MM) and Additional Modifications (AM), and offer the following comments and recommendations. Note that these are directed primarily to the Inspector.</p> <p>The comment is in two parts, the first concerning various items which we hope to have changed or corrected, the more substantive second part relates specifically to modification MM25 which concerns a proposed housing allocation on a site at Cox's Green, Wrington.</p> <p>Please let us know if you require further information or clarification of any of the points made below.</p> <p>Section 1. Comments on the consultation document, other than housing:</p> <p>2. Policy Context</p> <p>We note and support the statements under Policy Context, in particular the key objectives listed under para 2.8. We previously commented that we were pleased to see</p>	

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		<p>the clear commitment to protecting the Green Belt and valued countryside, and to preserving the character of the existing settlements, strategic gaps and green spaces. Also the commitment to sustainable development in line with the principles set out in the NPPF. However, it seems that some of the sites now proposed for housing in and adjacent to the villages could not be considered to provide 'sustainable development'. As a result, there appears to be a conflict between NSC's declared commitment to sustainable development under the NPPF and its approach to these site allocations. This is a concern.</p> <p>3. Evidence Base</p> <p>We note the reference to the evidence base and key documents.</p> <p>It states under para 3.6 that a Sustainability Appraisal is a legal requirement. However, while there is further reference to a Scoping Report produced in 2007 and to a Main SA Report, we cannot locate the relevant Sustainability Appraisal.</p> <p>Habitat Regulations Assessment</p> <p>At the last consultation stage, October 2016, we commented:</p> <p>In the previous consultation we commented that we were disappointed that the Habitat Regulations Assessment (HRA) hadn't been made available. We note the statement under para 3.10 that the HRA 'will be submitted at the Publication Plan stage', which might be expected to be now, or at least it should be if it's to be made available for comment. It seems that the wording here has been carried over, with no explanation provided as to why the HRA hasn't already been completed.</p> <p>We question why there is still no HRA available for comment.</p>	

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		<p>Policy SA2 – Settlement Boundaries</p> <p>We very much support the retention of defined settlement boundaries and the principle of this policy. However, at the previous consultation stage we objected to the policy statement wording, which was felt in part to be unnecessary.</p> <p>From our experience settlement boundaries are accepted by residents and other landowners as an acceptable and defined limit on certain development. Any attempt to extend beyond the boundary generally results in strong objection, and not just from the immediate neighbours.</p> <p>We have noted that it is stated in para 4.13 <i>‘For the purposes of the Plan, ‘countryside’ is defined as all otherwise unallocated land outside defined settlement boundaries’</i>. Hence, what is proposed here is potential development in the countryside, which appears to conflict with the policy aims elsewhere. While development might be allowed outside the curtilage of residential property it should not be outside the settlement boundary.</p> <p>As a result the policy wording should be amended to read:</p> <p>‘The extension of a residential curtilage will be permitted provided that it does not extend outside the settlement boundary and would not harm the character of the surrounding area or the amenities of adjoining occupiers.’</p> <p>Also, as it stands the policy wording and its probable interpretation are too subjective, particularly so as there is no limit proposed for any ‘extension into the countryside’. An alternative would be to set a defined physical limit to any extension outside the curtilage, and certainly if it’s to be outside the settlement boundary, with this always requiring a planning application so that neighbours, parish councils and other interested</p>	


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		<p>parties are always provided with the opportunity to comment. This should not be considered to be permitted development.</p> <p>Policy SA5 – Local Green Space</p> <p>This policy is strongly supported. However, we were disappointed to find that two sites previously recommended for designation as Local Green Space have not been included since these fit with para 77 of the NPPF. Our view is that these sites should be designated as Local Green Space and we ask that they are reconsidered. These are:</p> <p>i. The Mike Bush Paddock, Wrington Hill</p> <p>This is a grass space surrounded by hedging, trees and fields, providing extensive views over Wrington Vale to the south and south-west. This is well used as a picnic area, for general recreational purposes and as a stop-off for people walking both up and down Wrington Hill and further afield. Site area 0.25Ha.</p> <p>ii. Glebe Field extension:</p> <p>We requested that the Local Green Space designation for the Glebe Field, which is located between Church Walk and the Glebe, Wrington, is extended to include the green public amenity area which has recently been created on the site of the old surgery car park under planning application 16/P/1423/F, ref ‘Change of use of land to public open space’. This amenity area is considered to be an extension to the Glebe Field and mirrors it in character and layout, with this stated in the land management plan submitted with the planning application and agreed by NSC.</p>	

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		Note that this proposed designation was referred to in the planning application and subsequent permission	
Environment Agency	1020673//1	<p>Thank you for referring the above Site Allocations Plan, which was received on 11 September 2017.</p> <p>The Environment Agency has no comments to make, in addition to those contained in its letter dated 21 August 2017, which has been attached for your information.</p>	 NSC letter 21-8-2017-site allocations plan.rtf (101 KB)
Fisher German (E Pattison)	10397985//1	<p>Thank you for your email to CLH Pipeline System Ltd dated 20 September 2017 regarding the above. Please find attached a plan of our clients apparatus. We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline or alternatively go to www.lineearchbeforeudig.co.uk our free online enquiry service.</p> <p>Kind Regards,</p> <p>CLH Pipeline System Ltd</p>	 CONSULTATION_plan.pdf (1.4 MB)
Mead Realisations Ltd	1074881//1	<p>SITE ALLOCATIONS PLAN EXAMINATION: Proposed Modifications Consultation to the Site Allocations Plan</p>	 Location Plan - Land at Manor Farm.pdf (506 KB)  Location Plan - Land at Lynchmead Farm, Ebdon Road.pdf (760 KB)  Location Plan - Land off Ebdon

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		<p>I am writing on behalf of my client, Mead Realisations, in respect of the above consultation. This follows similar submissions sent to the Council in August 2017.</p> <p>This representation covers the following matters:</p> <ol style="list-style-type: none"> 1. The LPA’s decision not to undertake the work requested in the note from the Inspector following the closure of hearings on 18th May 2017. 2. The LPA’s approach to identifying potential new housing allocations. <p>The LPA’s approach to identifying potential new housing allocations</p> <p>The key reason that the LPA was unable to identify sufficient sites to meet the 2,500 dwelling requirement is the methodology that they have used, specifically:</p> <ol style="list-style-type: none"> 1. The LPA has decided to exclude sites where an application or pre-application request was not submitted before 18th May 2017. 2. The LPA has decided to exclude any sites that do not fully comply with the Core Strategy. Despite the Inspector noting at paragraph 23 of ID4 that: <p>"A further potential constraint to the identification of additional allocations is the distribution of housing identified in Policy CS14. However, CS14 refers to the “broad distribution of new dwellings” which indicates that the net additional dwellings listed in the policy do not constitute a straight jacket to be achieved, and that there is some flexibility for the distribution of housing provision within the settlement hierarchy in the CS."</p>	<p>Road.pdf (357 KB)</p> <p> Location plan - Land off Sand Road, Kewstoke.pdf (730 KB)</p>

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		<p>This methodology has resulted in the LPA discarding a number of sites that could enable them to achieve the 2,500 dwelling requirement.</p> <p>At paragraph 22 of the note issued on 18th May 2017 (ID4) following the closure of hearings the Inspector states:</p> <p>“I consider that the Council should test the potential for the provision of up to 2,500 additional houses in order to identify the environmental costs of allocating a wider choice of housing sites. Furthermore, where new allocations are to be made, there is a need to identify and allocate sites which can be made available for development at an early date to help meet the five year supply as well as secure the overall delivery of the housing requirement by 2026.”</p> <p>The instructions from the Inspector were clear and unambiguous. We were therefore extremely disappointed to note from the LPA’s interim response (CD2) to the Inspector that they decided not to undertake the work that was requested.</p> <p>Firstly, at paragraphs 7 to 16 of CD2 the LPA attempt to reopen discussion on the figure of 2,500 dwellings and make the case for a lower figure. This is inappropriate as it is not within the scope of work requested by the Inspector, and is clearly an attempt to row back on what was agreed during the hearing sessions.</p> <p>Secondly, the LPA has not tested the <i>“potential for the provision of up to 2,500 additional houses”</i>. <i>Even if all of the 28 sites on which the LPA sought comments on in August had been deliverable by 2026, they would have only delivered a total of 1,812 dwellings. This falls significantly short of the figure of 2,500 dwellings that the LPA was asked to test.</i></p> <p>2. The LPA’s approach to identifying potential new housing allocations</p>	

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		<p>The key reason that the LPA was unable to identify sufficient sites to meet the 2,500 dwelling requirement is the methodology that they have used, specifically:</p> <ol style="list-style-type: none"> 1. The LPA has decided to exclude sites where an application or pre-application request was not submitted before 18th May 2017. 2. The LPA has decided to exclude any sites that do not fully comply with the Core Strategy. Despite the Inspector noting at paragraph 23 of ID4 that: <p>"A further potential constraint to the identification of additional allocations is the distribution of housing identified in Policy CS14. However, CS14 refers to the "broad distribution of new dwellings" which indicates that the net additional dwellings listed in the policy do not constitute a straight jacket to be achieved, and that there is some flexibility for the distribution of housing provision within the settlement hierarchy in the CS." This methodology has resulted in the LPA discarding a number of sites that could enable them to achieve the 2,500 dwelling requirement.</p> <p>Land promoted by Mead Realisations</p> <p>We can confirm that the land remains available and proposals could be progressed quickly in order to contribute to the housing land supply. However, it is also clear that the Council will need to identify additional sites and as such the following potential development land is commended to the Council:</p> <ol style="list-style-type: none"> 1) Land off Ebdon Road (circa 27 dwellings) 2) Land at Lynchmead Farm, Ebdon (up to 300 dwellings) 3) Land at Manor Farm, Collum Lane, Worle (up to 90 dwellings) 	

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		<p>4) Land at Home Farm, Kewstoke (up to 630 dwellings)</p> <p>These sites are known to the Council having previously been submitted in relation to the West of England Joint Spatial Plan Call for Sites exercise. For reference I attach location plans of each.</p> <p>Conclusions and Recommendations</p> <p>The Proposed Modifications are insufficient to make the Site Allocations Plan sound.</p> <p>Specifically, the Plan has not been 'positively prepared' and is not 'justified', two of the tests of soundness set out at paragraph 182 of the NPPF.</p> <p>In order to address this issue I strongly urge the Inspector to pause examination and advise the LPA that they need to undertake a more thorough site assessment process that identifies sufficient sites to address the significant shortfall in the LPA's 5 year housing land supply, and ensure that they meet their overall housing requirement for the plan period.</p> <p>Finally, please note that I would like to appear at any future hearing sessions on the Site Allocations Plan.</p>	
South West Strategic Developments	11221409//1	<p>REPRESENTATIONS TO THE SITE ALLOCATIONS PLAN MAIN MODIFICATIONS – LAND NORTH OF OLDMIXON ROAD, WESTON-SUPER-MARE</p>	<p> 271 A3 CC 271017 Representations Ltr to SAP - Land north of Oldmixon Road, WSM.pdf (2.1 MB)</p>


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		<p>On behalf of South West Strategic Developments (SWSD), Grass Roots Planning have been instructed to prepare and submit representations to North Somerset Council's (NSC) Main Modifications Consultation on the Sites and Policies Plan Part 2: Site Allocations Plan Examination. These representations primarily relate to land north of Oldmixon Road, Weston-super-Mare. In respect to this land SWSD recently secured outline planning permission for 130 dwellings via appeal (Ref: APP/D0121/W/16/3150985) and are currently in the process of securing a suitable housebuilder to progress this scheme. Please find a site location plan enclosed with this letter.</p> <p>The Inspector's Request</p> <p>The Sites and Policies Plan Part 2: Site Allocations Plan (SAP) when adopted will provide housing and employment allocations to meet the requirements of the North Somerset Core Strategy, to deliver a minimum of 20,985 dwellings over the plan period 2006 – 2026.</p> <p>Hearings were held by the Inspector in May 2017 for discussion on the delivery of housing between North Somerset Council and the development industry, and after careful consideration, the Inspector confirmed in a letter on the 26th June 2017, that NSC should 'test the allocation of additional sites within the SAP, which would have the capacity to accommodate up to 2,500 dwellings, and which have a realistic chance of being delivered by the end of the CS period in 2026'.</p> <p>The Council therefore compiled a list of sites for assessment for further allocation. Following the publication of this assessment NSC undertook a three-week consultation process between the 1st and 21st August 2017 in which any interested party could submit comments.</p>	

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		<p>As land north of Oldmixon Road was included within the list of allocations within this plan, we did not make any representations at this time.</p> <p>On the 5th September 2017 at the Executive Committee, a report was put forward by officers of the council, which can be summarised as follows:</p> <ul style="list-style-type: none"> • The Inspector asked the Council to test ‘up to 2,500 homes’ but this was never intended to be a target; • The robustness of the assumption to allocate an additional 2,500 dwellings is being questioned as this was primarily suggested by the development industry; • The recommended contingency as a result of the site assessment process is 821 dwellings; • It is anticipated that all the identified 821 dwellings are expected to be delivered within 5 years; this reflects the Inspector’s priority to identify sites capable of contributing to the delivery of the five year supply; and • Furthermore, the development plan is about to be reviewed through the Joint Spatial Plan and new Local Plan, so in practice the Site Allocations Plan is not going to run its course to 2026. <p>As the Inspector has already stated within her letter to the council in June, there are serious risks to adopting the plan in its current state due to the potential that certain allocated sites will not come forward within five years or within the rest of the current development plan period.</p>	

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		<p>With a five year housing land supply estimated at anything between 2.3 and 3.7 years, and a deficit in housing delivery of 2,692 dwellings which is acknowledged within the Statement of Common Ground between parties at the SAP Hearings, there is a significant and serious shortfall that needs to be dealt with in the next five years and the Council ought to be allocating far more than 821 additional dwellings.</p> <p>Furthermore, we have serious concerns over the work that has been undertaken by the Council so far and the choice of allocations made lack credibility in our view. We would at this stage like to present additional land north of Oldmixon Road as an allocation that allows for an increased number of dwellings, over and above what is already permitted.</p> <p>Land north of Oldmixon Road, WSM</p> <p>The original development proposed was for up to 150 dwellings (Application Ref: 16/P/0150/O), but during the course of the appeal this was subsequently reduced and permission was granted for 130 dwellings in April 2017 (Appeal Ref: APP/D0121/W/16/3150985).</p> <p>During the determination of the application 16/P/0150/O, the applicants met with North Somerset Council in June 2016 to discuss the possibility of a revised application being submitted. The planning policy context at that time meant that the most westerly field was located within the settlement boundary as an employment allocation. However, the Council made it clear that once the Site Allocations Plan was submitted, this part of the site would be removed from the settlement boundary and no longer taken forward as an allocation.</p> <p>This part of the land lies partly within Flood Zone 3 and partly outside of the flood plain. The Council indicated they would be more willing to accept an application solely</p>	

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		<p>in this location rather than on the wider site (i.e. land outside of the old settlement boundary), and subject to appropriate flood risk mitigation, proposals could comply with national and local planning policy.</p> <p>A secondary application for 45 dwellings was submitted on this western field, and this ran in parallel with the wider application and appeal. However, time constraints meant that instead of undertaking the extensive flood risk work, development was simply steered to outside of Flood Zone 3. The smaller site was granted permission in March 2017 (Application Ref: 16/P/2435/O).</p> <p>Flood Risk Compensation Scheme</p> <p>The housebuilders who wish to purchase the site have expressed a preference to deliver playing pitches offsite via a commuted sum. The agreed Section 106 Agreement allows for this.</p> <p>Given this situation and the previous indication that the Council may support development in Flood Zone 3, and in light of the fact that many of their current allocations already propose residential development in such zones, SWSD instructed flood risk consultants to investigate how development could be achieved within the part of the site within Flood Zone 3. The area in question consists of the land that as part of the appeal proposals was envisaged as accommodating playing pitches.</p> <p>Their initial investigations have identified proposals to construct a development platform in the land within Flood Zone 3, at a level above the 1 in 100 year plus climate change event. This will ensure that development is safe from fluvial flooding.</p>	

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		<p>Finished floor levels of the housing could also be raised to provide further protection from tidal flooding, should a breach in the tidal defences occur, in much the same way mitigation was proposed and agreed on the appeal development area.</p> <p>The construction of the development platform would result in the displacement of fluvial floodwater. Therefore, a floodplain compensation scheme would be needed and this is proposed to be a ‘volume for volume’ strategy. This involves cutting into the ground upstream of the development platform, to allow this area to flood first and to mitigate any displacement impact. An over provision of flood compensation would be delivered to allow betterment to the local flood mechanism. The current scheme shows a 20% over provision which would make a significant improvement and reduce flooding locally.</p> <p>This information was submitted to the Environment Agency in September 2017 and their response identified that development in this location, including the mechanism proposed, could be acceptable. However, they recommended that flood risk modelling work would still be required to further evidence this. This modelling is about to be undertaken.</p> <p>As such, the applicants would like to submit an application to propose an additional 50 dwellings on the land north of Oldmixon Road, replacing the playing pitches that are currently proposed on this most westerly field (please find enclosed the masterplan which was approved at appeal for 130 dwellings).</p> <p>The site accords with the spatial strategy being located on the edge of Weston-super-Mare and would help boost the supply in housing that the Council so desperately needs at this time. Therefore it is our view that it should be identified as an additional allocation to boost the supply of housing in a sustainable location – the primary town of NSC.</p>	

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		<p>As we have set out, we have serious concerns with a number of proposed allocations in the current version of the Site Allocations Plan and the consistency in decision-making by NSC, and consider that the Council should be considering sites in more sustainable locations, such as on the edge of Weston-super-Mare and the Weston Villages.</p> <p>As such, we consider that land at Oldmixon Road has the capacity to increase the overall number of dwellings up to 180 with inclusion of additional housing in the most westerly field (the 130 allowed at appeal and an additional 50), and we respectfully request that the Inspector considers this site as a viable option for an increased number of dwellings, which will make the most effective and efficient use of land in a sustainable location and can deliver housing over the next five years and within the rest of the development plan period.</p> <p>Should you have any queries, or would like to discuss the site further, please do not hesitate to contact us.</p> <p>PLEASE SEE ATTACHMENT FOR APPENDICES</p>	
Strongvox Homes & Landowners (Pegasus)	11683201//1	<p>Sites and Policies Plan Part 2: Site Allocations Plan: Main Modifications Consultation - Land to the east of Brinsea Road, Congresbury, BS49 5JJ & Land West of Wolvershill Road, Banwell</p> <p>Town and Country Planning Act (Local Planning) (England) Regulations 2012</p> <p>We write on behalf of our client, Strongvox Homes, to make representations to the Proposed Main Modifications to the Sites and Policies Plan Part 2: Site Allocations Plan (SAP) prepared by North Somerset Council (the Council). Strongvox Homes have a</p>	 Strongvox.pdf (2.4 MB)

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		<p>land interest on land to the east of Brinsea Road, Congresbury which was a site within the Development Management Process as at 26th June 2017, but was not the subject of further assessment. Strongvox also have a land interest on land west of Wolvershill Road, Banwell which was brought to the Council's attention as part of the Council's earlier consultation in August 2017. Site Location Plans for both sites are provided at Appendix 1 of this letter.</p> <p>APPENDIX 1: SITE LOCATION PLANS</p> <p>These representations expand upon representations made previously in respect of the SAP. Accordingly, these representations consider the following issues:</p> <ul style="list-style-type: none"> • Background to SAP Examination; • Additional Site Selection; • Deliverability of Identified Sites; • Paragraph 14 – Plan Making; • MM1 – Policy SA1 and supporting text; • Land to the east of Brinsea Road, Congresbury; and • Land to the south of Wolvershill Road, Banwell. <p>Background</p>	

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		<p>The Council submitted the SAP for examination on 24th February 2017. The SAP underwent examination by the Planning Inspectorate from 16-18 May 2017. Following the close of the hearings the Inspector (Ms Wendy Burden) wrote to the Council on 26th June 2017 setting out further work that she considered necessary in relation to the delivery of housing.</p> <p>To secure the delivery of Core Strategy (CS) Policy CS13, the Inspector considered the need for the Council to test the provision of additional sites for up to 2,500 homes within the SAP. Specifically, she noted:</p> <ul style="list-style-type: none"> • <i>“The additional sites for up to 2,500 dwellings are not a proposal to increase the overall housing target identified in Policy CS13.</i> • <i>The identification of additional sites would help to provide flexibility and certainty that the CS housing requirement can be met since:</i> <ul style="list-style-type: none"> o <i>Due to constraints on sites allocated in the SAP it is not certain that they will be developed by 2026;</i> o <i>Additional sites are required to make up for those which are unlikely to be delivered.</i> • <i>The increased choice and flexibility provided by additional allocations in the SAP would assist the Council in demonstrating that they have a fiveyear housing land supply.”</i> <p>The Inspector made other conclusions regarding the application of the Sedgefield methodology and appropriateness of a 20% buffer for persistent under delivery which are of relevance.</p>	

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		<p>All the above point to the Inspector’s concerns that the sites identified within the submitted SAP draft are heavily constrained and additional sites, up to 2,500 new homes, should be considered to ensure there is sufficient choice and flexibility.</p> <p>Within the letter the Inspector also notes that the Council has agreed to test three areas for additional allocations:</p> <ul style="list-style-type: none"> • <i>“Sites which are broadly consistent with the Core Strategy spatial strategy (sites within or adjacent to Weston, the towns and service villages, but not infill villages, countryside or Green Belt).</i> • <i>Sites which have been considered through the SAP examination process.</i> • <i>Sites which are in the development pipeline – as these are more likely to be deliverable and could potentially contribute to 5- year supply.”</i> <p>Additional Site Selection</p> <p>It is clear from the discussion above that the thrust of the Inspector’s comments were to consider potential additional sites for up to 2,500 additional units. However, the Council’s approach as outlined within paragraph 3 of their letter to the Inspector dated 26th June 2017 the Council considered it necessary to create a “<i>clear cut-off</i>”. We consider this was a fundamentally flawed approach as it restricted the range of options that could potentially be considered by the Council to only those already within the system (i.e. live application or pre-application). We consider that the Council should have made a formal call for sites at that point so as to allow a wider range of sites to be considered.</p>	

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		<p>The Council could have then proceeded with an initial sift which would have excluded any sites which had been submitted which weren't "<i>broadly consistent with the Core Strategy spatial strategy.</i>"</p> <p>From this point the Council then applied an initial sift to those sites within the system and automatically excluded any sites which were the subject of an appeal (including the Strongvox site at Brinsea Road) and sites contrary to the Core Strategy Framework.</p> <p>In the case of the site at Brinsea Road, we were surprised that this site was excluded. Whilst the Council had taken a formal decision to refuse the submitted 24 unit scheme (which is the subject of an on-going appeal) officers had confirmed that the principle of residential development for at least a 10 unit scheme was acceptable (a point confirmed by Policy Officers). We consider that it is inherent with making an allocation that the principle is confirmed but the technical detail still needs to be proved through a formal application. Accordingly, there could be appeal schemes where the Council was accepting of the principle but had refused on specific technical matters as such could still have been considered for allocation.</p> <p>As a result of this constrained assessment methodology, the phase 2 assessment contained options which allowed for a potential additional 1,812 new homes across 28 sites. This figure is clearly significantly short of the 2,500 figure which the Inspector asked the Council to consider.</p> <p>The reassessment work culminated in a reduction of 6 sites from the 28 and a recommendation to allocate the remainder which would boost the allocation total by an additional 821 dwellings.</p> <p>MM1 – Policy SA1 and supporting text</p>	

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		<p>Table 1 of the October 2016 Publication Version SAP sets out the projected housing delivery across the plan period, comprised of completions, allocations, sites with planning permission and a windfall allowance, and is supported by a spreadsheet, referred to as CD1a, showing the projected annual delivery of these sites. Whilst the identified supply figure of 21,051 homes, if deliverable, meets the Core Strategy OAN, it does not meet the total plan period requirement when the under-delivery to date and a 20% buffer over the next five-years are applied in line with the Inspector's recommendations. Indeed, with reference to our table below, when the past shortfall and the buffer are included the overall housing need across the plan period rises to 23,616.</p> <p>It is for this reason, together with some uncertainty about the deliverability of the sites already identified (most notably the delivery trajectories advocated by the Council at Weston Villages strategic allocation), that the Inspector considered that additional land should be allocated for a further 2,500 homes through the Main Modifications process.</p> <p>However, the Council has as noted above only found additional land for 821 new homes.</p> <p>SEE ATTACHMENT FOR TABLES AND APPENDICES</p> <p>As shown in row H of the table, the result of this failure to respond to the Inspector's request means that the identified supply in the SAP for the remaining plan period remains well below the actual requirement, undermining the delivery of the Core Strategy to 2026.</p>	

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		<p>In fact, due to a revised “lapse-rate”¹ and review of the rate of delivery of existing sites (‘commitments’), the identified supply for the remaining plan period has actually shrunk from 13,849 to 13,438. The shortfall is therefore 1,331 dwellings.</p> <p>Critically, the Main Modifications also fail to address the uncertain deliverability of the plan in the short term, over the next five years. The supporting annual trajectory has been updated and is referred to as CD4a. Although all of the new allocation sites found for the additional 821 homes are projected to be delivered within the next five years, this document shows a total 5-year supply of 9,149 homes, and therefore that there is still not enough housing to meet the authority’s five-year housing need of 9,524. The failure of the Main Modifications and supporting evidence to demonstrate a five-year housing land supply renders the SAP unsound.</p> <p>Deliverability of Identified Sites</p> <p>For the purposes of simplicity in comparing the SAP identified housing supply with the Inspector’s request, the above discussion assumes that the Council’s housing trajectory is reliable.</p> <p>However, whilst the projected supply of 9,149 homes versus our identified need of 9,524 equates to a 4.8 year housing land supply, our view is that this is not a wholly accurate figure because the trajectory is over-optimistic.</p> <p>We agree with other representations, including that made by Neil Tiley of Pegasus Group (Hearing Statement ref. HS-2-1a) in the examination hearings, that the deliverable supply from existing commitments and originally identified site allocations is less than identified by the Council due to a combination of site-specific constraints and unachievable projected build-out rates on strategic sites.</p>	


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		<p data-bbox="539 328 875 355">'Paragraph 14' Plan-Making</p> <p data-bbox="539 395 1570 496">For these reasons, more work needs to be done to identify further sites which are available, suitable and deliverable over the next five years and the remainder of the plan period to meet the identified housing requirement.</p> <p data-bbox="539 536 1547 600">The 'Presumption in Favour of Sustainable Development' established in paragraph 14 of the NPPF should be seen as the 'golden thread' in the planning process:</p> <p data-bbox="539 639 943 667">"For plan-making this means that:</p> <ul data-bbox="539 707 1570 983" style="list-style-type: none"> <li data-bbox="539 707 1435 770">• <i>Local planning authorities should positively seek opportunities to meet the development needs of their area;</i> <li data-bbox="539 810 1570 983">• <i>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or – specific policies in this Framework indicate development should be restricted."</i> <p data-bbox="539 1023 920 1050">Land to the east of Brinsea Road</p> <p data-bbox="539 1090 1447 1153">Pegasus made representations on this site in August 2017 and a copy of these representations are appended to this statement at Appendix 2:</p> <p data-bbox="539 1193 1267 1220">APPENDIX 2: PEGASUS REPRESENTATIONS 17/08/2017</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Based on our assessment above it is clear that the Council has not identified sufficient additional sites to make the SAP sound. Accordingly, we consider that the Council should be asked to consider making further allocations.</p> <p>We believe the Council’s methodology was fundamentally flawed both in terms of the arbitrary way the Council started its assessment and its treatment of sites such as the Strongvox site at Brinsea Road.</p> <p>On this latter point, we believe from a Sustainability Assessment perspective the Brinsea Road site compares extremely favourably with both other sites which already benefit from permission within Congresbury but as importantly when compared to other sites which are proposed for allocation. TPA have produced a comparison matrix showing the Sustainability Assessment of transport matters for a range of sites and this is appended to this representation at Appendix 3.</p> <p>APPENDIX 3: SUSTAINABILITY ASSESSMENT COMPARISON MATRIX</p> <p>One of the proposed additional 22 sites is land south of Cadbury Garden Centre. With this in mind we provide a direct comparison between the two to emphasise the point that the Brinsea Road site should be allocated. The table below uses the same sustainability assessment criteria used by the Council in their assessment and applies this to the Brinsea Road site in the absence of the Council’s consideration. The assessment for the Cadbury Garden Centre is taken directly from the Council’s assessment.</p> <p>SEE ATTACHMENT FOR FULL TABLE</p> <p>As can be clearly seen the Brinsea Road site in our opinion scores significantly better against this assessment criteria than one of the site’s the Council is electing to allocate within the village of Congresbury. Accordingly, we believe at the Council requires</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>based on our assessment to identify additional sites, one such option would be to allocate the Brinsea Road site. As we have highlighted we consider the Council failed in its original assessment to consider sites such as this and this fundamentally weakened their ability to achieve possible sites of up to 2,500 dwellings.</p> <p>Land West of Wolverhill, Banwell</p> <p>Representations about this sites availability were made to the Council in August 2017 and we append a copy of these representations at Appendix 4.</p> <p>APPENDIX 4: PEGASUS REPRESENTATIONS 17/08/2017</p> <p>The site consists of two fields in use for agriculture covering an area of approximately 3.2 hectares of land and could achieve in the order of 60 dwellings. This is located immediately beyond the settlement boundary to the north of Banwell. Banwell is defined as a service village within the North Somerset Core Strategy.</p> <p>Banwell Primary School is within 500m of the site. Sidcot School (privately funded), Churchill Academy and Baytree School are all within 3 miles and provide education up to the age of 18.</p> <p>Banwell also has a post office, convenience store, restaurants, pharmacy, GP surgery, public houses, places of worship and a village hall. These provide local employment opportunities alongside car garages/dealerships, the nearby Knightcott Industrial Estate and other small businesses.</p> <p>Bus stops are located nearby to the south of the site along Wolverhill Road and the A371 providing regular services between Weston-super-Mare and Clevedon, Wells and Bridgwater.</p>	

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		<p>Weston-super-Mare is approximately 20 minutes by bus providing connections to wider bus services to regional centres such as Bristol and the national rail line.</p> <p>It is noted that a scheme for 155no. dwellings off of Knightcott Road was refused and dismissed at appeal under appeal reference APP/D0121/W/15/3138816 (LPA ref: 15/P/0248/O). The appeal decision made clear that the planning balance warranted dismissal only by virtue of the impact on landscape setting to Banwell and it is therefore accepted that Banwell could accept such a quantum of development as that arising from the proposed site.</p> <p>Our client has an option upon the site subject to planning. There are no constraints to bringing development forward upon the site and this could comfortably be delivered within the next 5 years (circa 3 years).</p> <p>There are no known constraints upon viability and it is expected that a policy compliant level of affordable housing could be secured from any development upon the site.</p> <p>This site represents a highly suitable location for development with no constraints that prevent development coming forward within the next five years. As such this can meaningfully contribute to addressing the Council's Five-Year Housing Land Supply and the Examining Inspector's set target to allocate a further 2,500 new homes under the SAP.</p> <p>Conclusion</p> <p>We report that the Main Modification MM1 to policy SA1 and supporting text of the SAP fails to adequately address the housing need and that further site allocations are needed to provide a source of supply for delivery over the remaining plan period, and critically for the next 5 years.</p>	

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		<p>Both sites are sustainably located and suitable for development for in the region of 80-100 dwellings. Both are available now and can contribute to the 5-year housing land supply shortfall. We have assessed the suitability of the site using the Council's own methodology and shown it to meet the paragraph 14 'test' for inclusion in the emerging SAP.</p> <p>We would be pleased to provide any further information and would welcome the opportunity to discuss the site in more detail. We also request to be kept informed of any updates to the examination process, including the opportunity to make verbal representations at hearing should it arise on behalf of our client.</p> <p>SEE ATTACHMENT FOR ALL TABLES AND APPENDICES</p>	
Keith	11791585//1	<p>My comments are focused around the development of Weston super Mare which has an excellent long term plan. We see a increasing emphasis upon the footprint we provide and this increase will grow and grow. Therefor we should really look to providing access to any new constructions whether industrial, commercial or residential for Push Bikes.</p> <p>When constructing access, consideration should be given to <u>dedicated</u> bicycle routes that cannot be compromised by stationary or moving vehicles.</p>	

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		<p>Economically it makes sense to provide this during planning and construction and will be a beacon to others as to what can be achieved in Weston super Mare and North Somerset.</p>	
<p>Moor Park (North Somerset) Ltd (T Roche)</p>	<p>11854273//1</p>	<p>MM1, MM4-MM32: Table 1, Schedule 1 and Policies Map OBJECTION</p> <p>The Proposed Modifications fall well short of the Inspector’s clear requirements for a buffer based on 20% of the residual housing requirement which would call for sites to accommodate some 2,500 additional units. Her advice to the Council was quite clear that: <i>... if the SAP is adopted in its current form with the high level of uncertainty as to the deliverability of allocated sites and in particular the need for more sites that can be developed within the next five years, it would fail to deliver the CS requirement or to ensure that the Council can maintain a 5 year housing land supply. Sources from which additional allocations can be sought have already been identified by the Council, and some preliminary work is being carried out to test suitable sites. Having regard to the urgent need to boost the supply of housing, I consider that the Council should test a potential for the provision of up to 2,500 additional houses in order to identify the environmental costs of allocating a wider choice of housing sites. Furthermore, where new allocations are to be made, there is a need to identify and allocate sites which can be made available for development at an early date to help meet the five year supply as well as secure the overall delivery of the housing requirement by 2026.</i></p> <p>There is no evidence whatsoever that the Council has ‘tested the potential’ of up to 2,500 additional houses, and identified, through sustainability appraisal, that there are overriding ‘environmental costs’ of meeting it. There is no robust consideration and rejection of potential options on environmental grounds. On the contrary, the Council has simply selected a number of sites on the basis of a cursory screening against the</p>	<p> Moor Park.pdf (10.2 MB)</p>

Respondent Name	Comment ID	Comment	Attached documents
		<p>provisions of the Core Strategy and tested those. The sites that have been tested have not had the cumulative capacity to deliver the 2,500 additional houses required by the Inspector. The ‘potential’ has therefore not been tested, and therefore the Council has not done what the Inspector required them to do.</p> <p>MP fully endorse the ‘Joint Response of the Development Industry’ to consultation on the Proposed Modifications. The following elements of that response are highlighted:</p> <ul style="list-style-type: none"> • Through the supporting documentation (CD2), the Council has inappropriately sought to re-open the debate on the additional quantum of housing to be provided. This has caused the Council to neither test, nor meet, the Inspector’s requirements, rather than their failure to make additional provisions to meet it being a reflection of unacceptable conflict with the Core Strategy, or environmental costs, of doing so. • he Council has failed to properly assess all potential sites that are in the development pipeline. • All ‘deliverable’ sites that are well advanced in the planning process should be subject to further assessment, to include a balancing exercise of deliverability against policy compliance. • The process of selecting/rejecting sites to be taken forward for further assessment has been both arbitrary and lacking in transparency. <p>The process has failed to identify provision for an additional 2,500 units and, <i>ipso facto</i>, to demonstrate that the implications of doing so would be a plan that fails to comply with the Core Strategy and/or give rise to unacceptable environmental costs, in accordance with the clear requirements of the Inspector.</p>	

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		<p>The outcome of the site assessment process is therefore that the Council has failed to identify sufficient sites to deliver the additional requirement identified by the Inspector. Moreover, since sites with the cumulative capacity to deliver the additional requirement have not been tested, the Inspector has neither sufficient nor robust evidence to conclude that it cannot be met in a policy compliant and/or sustainable manner. Nowhere are the deficiencies of the process thrown into sharper focus than in the case of MP's omission site at Laney's Drove (CD2a, Ref: 16/P/0329/O).</p> <p>At the Examination, applying the relevant priority criteria subsequently endorsed in the Inspector's preliminary findings⁴, the Council presented to the Inspector a list of sites that it adjudged to be broadly consistent with the Core Strategy Spatial Strategy, had been considered through the SAP Examination process, and which were in the development pipeline. That document, which is now part of the evidence base for the Examination (ED36), included MP's omission site at Laney's Drove amongst the sites that satisfied the relevant criteria and should therefore be taken forward for further consideration for accommodating the additional requirement identified by the Inspector.</p> <p>MP were therefore incredulous to note that the Council subsequently reassigned their omission site at Laney's Drove to the category of those deemed to be contrary to the Core Strategy framework (CD2a), and for which reason it was excluded from those taken forward for further assessment. Having adduced in evidence to the Examination that MP's omission site was broadly consistent with the Core Strategy spatial strategy and was appropriately included in the 'town' category, it is impossible to understand the basis on which it was subsequently re-assigned as 'countryside', included amongst the sites deemed to be 'contrary' to the Core Strategy Framework, and was therefore excluded from further consideration and site assessment. No evidence or justification has been provided for this change. MP note from a comparison of the two schedules (ED36 and CD2a) that it was the only site that was subsequently deemed to be contrary to the Core Strategy spatial strategy based on a re-categorisation from 'town' to</p>	

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		<p data-bbox="539 328 1458 389">‘countryside’. There is no evidence to support, or justification for, this change whatsoever.</p> <p data-bbox="539 432 1576 778">Given that the Council’s approach excluded any further assessment of sites not identified for further consideration following the initial screening against the Core Strategy, it was essential that there was a transparent process of selection and rejection of sites for further consideration, and a flexible interpretation of the Core Strategy assumed at that stage. Based on the current definition of settlement boundaries, many of the sites categorised as ‘Town’ and ‘Village extension - service village’ that were taken forward for further assessment are ‘countryside’ in policy terms at the present time. MP also note that sites categorised as ‘countryside’ remote from any settlement are included in the sites for consideration, notwithstanding that their sustainability credentials are greatly inferior to their site on the edge of Weston-super-Mare.</p> <p data-bbox="539 818 1570 1023">Therefore, even if MP’s site is reassigned to the ‘countryside’ category, for which there is absolutely no evidential support whatsoever, its exclusion from further consideration, whilst greenfield sites at the smaller service villages and sites similarly categorised at Barrow Hospital, Sandford and Winford, that are currently outside defined settlement limits and therefore ‘countryside’ sites in planning policy terms, are taken forward for further assessment, is completely lacking in justification.</p> <p data-bbox="539 1062 1563 1339">MP have raised concerns with the Council about the process of consideration of their application for outline planning permission, and which has ultimately caused them to Appeal against its non-determination and to simultaneously submit a duplicate application for the Council’s further consideration⁵. This unevidenced and unjustified change in the categorisation of their site outside the Examination process that has resulted in it not being taken forward for further assessment and consideration by the Executive, does little other than to compound their concerns that the merits of their site as a sustainable development opportunity for meeting housing needs have not been</p>	

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		<p data-bbox="539 328 1458 392">fairly and properly considered through either the plan-making or development management processes.</p> <p data-bbox="539 432 1570 671">The allegation in the Joint Response by the Development Industry that the site selection process has been arbitrary and is lacking in transparency, is therefore fully endorsed by the specific example of MP's omission site at Laney's Drove. It confirms that there is no robustly evidenced and properly justified basis to support the Council's contention that they are unable to make provision for the additional 2,500 dwellings held by the Inspector to be necessary in a manner that would be consistent with the Core Strategy policy framework.</p> <p data-bbox="539 711 1570 1126">Having regard to the foregoing submissions, and those contained in the Joint Response of the Development Industry, the Inspector is urged to carefully review the Council's approach to selection of the sites taken forward for further assessment. For reasons set out in the joint response, at the very least it ought to have included all non-Green Belt sites put forward as omission sites and that are well advanced in the planning process. It ought therefore to have included MP's omission site at Laney's Drove. Failure to respond to the deficiencies of the process identified by the development industry, as thrown into sharp relief by the case of MP's site at Laney's Drove, is considered to be a basis for finding that the SAP is unsound given that there is no evidenced basis for concluding that the requirement for an additional 2,500 dwellings cannot be met with sites that are consistent with the Core Strategy spatial strategy and would not give rise to unacceptable environmental costs.</p> <p data-bbox="539 1166 1570 1302">There is no justification for the Council's <i>volte face</i> in reassigning MP's omission site at Laney's Drove from a Part 2 site (Sites broadly in conformity with the Core Strategy framework that will be assessed) in ED36, to a Part 1 site that would not be subject to further assessment in CD2a. The site achieves the three criteria identified by the</p>	

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		<p data-bbox="539 328 1491 392">Council for the additional allocations which are to be tested as summarised in the Inspector's letter:</p> <ul data-bbox="613 432 1570 1342" style="list-style-type: none"> <li data-bbox="613 432 1570 1134"> <p data-bbox="645 432 1525 1134"><i>Sites which are broadly consistent with the Core Strategy spatial strategy (sites within or adjacent to Weston, the town and service villages, but not infill villages or Green Belt):</i> although the site is outwith the settlement boundary, the site is adjacent to Weston-super-Mare and one of the town's principal employment sites (Weston Business Park) that the Plan seeks to safeguard and expand. There has been no comprehensive review of the settlement boundaries through the Plan; moreover, it is a specific strategic commitment contained in Core Strategy Policy CS28 that the settlement boundary of Weston-super-Mare will be amended to 'incorporate the new Weston Villages'. Once that commitment has been discharged, the site will at least be adjacent, and for reasons set out in MP's earlier representations and Position Statements to the Examination, may even be included 'within' the settlement boundary. The site is not within the Green Belt, and there is no conflict with Core Strategy Policy CS19 which does not designate strategic gaps. The Inspector made it clear at the Examination that, in order to meet the additional requirement, it would be necessary to revisit the Strategic Gaps as currently proposed in the emerging Plan, and that they should not act as a constraint on otherwise sustainable development. MP's omission site is therefore broadly consistent with the Core Strategy spatial strategy as put in evidence by the Council to the Examination in May 2017.</p> <li data-bbox="613 1174 1570 1342"> <p data-bbox="645 1174 1570 1342"><i>Sites which have been considered through the SAP examination process:</i> the site has been promoted as an omission site through every stage of consultation on the emerging SAP, and is available for the Council and/or the Inspector to include amongst the portfolio of additional sites to meet the additional housing requirement in the emerging Plan. Since the site is the subject of a planning</p> 	

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		<p>application, there is a detailed evidence base to confirm its suitability for development. Through the planning application process it has been confirmed that there are no technical or environmental constraints on its development. The only residual issues that remain through the development management process are the matters of principle that the site is outwith the settlement boundary and within a proposed Strategic Gap. Those are matters that are available for resolution through the SAP Examination process by allocating the site and adjusting the Strategic Gap accordingly.</p> <ul style="list-style-type: none"> • Sites which are in the development pipeline – as these are more likely to be deliverable and could potentially contribute to 5 year supply: an application for outline planning permission (Ref:16/P/0329/O) was submitted in December 2015. Following resolution of all technical and environmental issues raised by consultees, MP made repeated requests that the application be reported to the Planning Committee for determination given the interest of a ward member who had involved himself in the application in the adjacent Helicopter Museum. In the wake of the reassignment of their omission site in CD2a published in July 2017, to a Part 1 site which would not be taken forward for further assessment, MP concluded that they had no alternative but to Appeal against the Council’s failure to determine their application in order to ensure that it is determined on its merits. An Appeal against non-determination was submitted on 21st September 2017. A duplicate application was submitted to the Council on 5th October 2017, and registered from 9th October (Application Ref: 17/P/2482/O), to enable them to consider their position further in the context of MP’s Appeal against their failure to determine their application, and to enable them to review their case promptly following the lodging of an Appeal in line with the guidance in the PPG7. In consequence, there remains a live application that, by the time that the consultation period has closed, the Council has prepared their response to the comments received, and the further 	

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		<p>submissions are before the Inspector for consideration, will be an application that is ready for determination, to which there are no technical or environmental objections given that it is an identical application to its predecessor in relation to which all such matters had been resolved, and in relation to which the only issues relate to matters of principle which are capable of being resolved through allocation in the SAP. MP's omission site a Laney's Drove therefore remains in the development pipeline, very well advanced in the planning process, is capable of contributing to housing supply within 18 months, and can yield its full capacity well within the five year period.</p> <p>REQUIRED CHANGES</p> <p>The following changes are required:</p> <ul style="list-style-type: none"> • Identification of additional sites that will meet the Inspector's requirements to enable the consequences of doing so to be properly tested. • Allocation of additional suitable sites, including MP's omission site at Laney's Drove, to bring the Plan into line with the Inspector's clear requirements. • Absent the above, the Plan is unsound, and the Inspector is requested to convene further Examination sessions to undertake her own investigation of the merits of omission sites that could enable her requirements to be upheld. <p>MM38: Policies Map</p> <p>OBJECTION</p> <p>MP object to the extension to the Weston/Locking Strategic Gap given that, for reasons raised in representations to the Publication Plan, the justification for the strategic gap as</p>	

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		<p>currently defined has not been made. Moreover, the Inspector was clear in her advice to the Council at the Examination that, in order to meet the additional housing requirement that she identified to be necessary in accordance with the spatial strategy of the Core Strategy, it would require a review of the strategic gaps as designated in the Publication Plan. There is no evidence that the Council has undertaken such a review. On the contrary, the evidence in relation to MP's site at Laneys Drove is that the strategic gaps have assumed the status of Green Belt policy in directing the Council's search for additional sites. That is a completely erroneous approach and accounts, in part, for the failure of the Council to meet the Inspector's requirements.</p> <p>Through their Position Statement in relation to Examination Matter 5, MP have provided evidence to support their view that the proposed boundaries of the SGs have not been robustly tested or subject to sustainability appraisal. Retrospective justification of the previously defined boundaries was provided in SD13. However, this pre-dated Inspector Bore's report on the re-examination of the remitted Core Strategy policies, and therefore did not provide a comprehensive review of the SG boundaries in the light of the greater flexibility that he introduced, which is necessary if those policies are to be effective. The continuing lack of review in the light of the SAP Inspector's recent findings simply compounds their outdatedness in relation to the emerging policy framework.</p> <p>MP repeat below their assessment of the Weston/Locking Strategic Gap tested against the relevant criteria in SD13, as set out in their evidence to the Examination.</p> <p>The SG between Locking and Weston-super-Mare is not justified. The extent of the land included within the SG between Weston-super-Mare and Locking as currently designated is certainly not justified. Inclusion of such an extensive tract of land is contrary to the strategic objective to deliver sustainable development. By over-designating the land area included within this SG, it restricts employment-led</p>	

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		<p>development at Weston-super-Mare, and fetters the ability of the Council to meet the requirements of the SAP Examination Inspector in accordance with the spatial strategy of the Core Strategy.</p> <p>The omission site at Laney's Drove includes part of Weston Business Park and land to the south in the same ownership. The area between Haywood Village, the Helicopter Museum and Weston Business Park is designated as 'green infrastructure/setting' on the Weston Villages Masterplan Framework that has been adopted as SPD8. It is therefore already subject to policy protection as part of a strategic development framework for which it is to provide part of the open space requirements. It is not open countryside that is at risk from <i>ad hoc</i> development, and therefore does not require the protection of strategic gap.</p> <p>The area between Haywood Village, the Helicopter Museum and Weston Business Park is further protected by the safeguarded land for Final Approach and Take Off (FATO) of Helicopters that is identified in the Weston Villages SPD9. That <i>cordon sanitaire</i> benefits from statutory Development Plan protection by dint of Policy DM31 of the Sites and Policies Plan (Adopted July 2016). Policy 31 resists planning permission for development that would prejudice the safe operation of Bristol Airport and 'other safeguarded aerodromes', and provides as follows:</p> <p><i>Parameters, including requirements for uncongested areas, associated with the flight activity of the Helicopter Museum will be addressed and integrated with development proposals at the Weston Villages in line with the Weston Villages SPD and expert guidance.</i></p> <p><i>The safeguarded corridor to allow safe and environmentally acceptable flight activity at the Helicopter Museum is shown on the Policies Map.</i></p>	

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		<p>There is therefore no justification for including land to the north of the Helicopter Museum within a SG. Moreover, Persimmon Homes has granted a 999 year lease of the land to the Helicopter Museum, which uses it for static aircraft museum pieces. It therefore has an urban function, comprising part of the green space provisions associated with the Haywood Village development. It is already adequately protected by statutory and non-statutory planning policies.</p> <p>Weston Business Park, including its land to the south, were historically part of Weston Airfield on which Haywood Village is now being developed. In physical and land-use terms, they are part of the urban area of Weston-super-Mare, a position that is now consolidated by development of Haywood Village. In planning policy terms Weston Business Park is one of the Weston-super-Mare's principal 'existing' and 'proposed' employment locations. The failure to undertake a comprehensive review of settlement boundaries through the SAP, and to respond to the strategic requirement of Policy CS28 to amend the settlement boundary at Weston-super-Mare to incorporate the new villages, means that the defined boundary for the town is out of date.</p> <p>Land immediately to the south of Weston Business Park is sandwiched between the existing business park and Oaktree Residential Park, the latter comprising 145 homes. The land does not contribute in any way to maintaining the separation between Locking and Weston-super-Mare. A much wider swathe of land that lies further south-east between Oaktree Residential Park and Locking entirely protects the separation of Locking and Hutton from Weston-super-Mare and provides an appropriate and sufficient SG. If the land immediately south of Weston Business Park were to be developed, it would not encroach into the buffer of land between Oaktree Residential Park and Locking, which measures 592 metres at its widest point and 252 metres at its narrowest.</p>	

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		<p>It is germane that, through the allocation of additional land at Moor Park in Schedule 2 of the SAP, which it is assumed includes the undeveloped eastern part of the existing Weston Business Park site, the Council accepts that development in an easterly direction to the line of the A371 will not prejudice any gap between Weston-super-Mare and Locking. Land immediately to the south between the existing business park and Oaktree Residential Park, will not extend development further east beyond the A371 or the eastern limit of the business park.</p> <p>The plans included at Annex 4 and Annex 5 to MP's representations to the Publication Draft Plan clearly demonstrate how development on the land between the existing business park and Oaktree Residential Park that is currently the subject of an application for outline planning permission¹⁰, would not reduce the buffer to the south east between existing development and Locking. It is further illustrated on the plan on page 2 of the appended promotional leaflet (<i>Appendix 1_Moor Park_Promotional Leaflet</i>). The plan on page 3 of the same leaflet, which reproduces the masterplan forming part of the application, demonstrates how the flood alleviation and sustainable drainage proposals associated with the scheme means that built development is curtailed well short of the eastern site boundary. As is illustrated on the plan on page 2, this enhances the green margin (within the red line area) around the east and south of the site, and clearly demonstrates that there will be no encroachment on any substantive gap between Locking and the Weston Business Park / Oaktree Residential Park.</p> <p>A more detailed analysis of the gap between the existing business park and development to the south and Locking is shown on the appended drawings (<i>Appendix 2_Strategic Gap Analysis</i>). This demonstrates that the gap, at its minimum distance, is approximately 252 metres. Development of land to the south of the business park would not compromise this distance at all.</p>	


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		<p>The focus of the Council’s evidence base in SD13 is on the residual gap between Locking Parklands and Locking. At this point the gap is extremely narrow, little more than the width of the A371. As stated in SD13, this is the narrowest part of the gap in terms of the distance between existing/proposed settlements, it reducing to approximately 50 metres between the land proposed for educational facilities at Parklands Village and Locking Village. Nevertheless, it is clearly deemed sufficient to maintain the separateness of settlements. As outlined above and confirmed by the Plan at Appendix 2, the gap between Locking and Weston Business Park to the west is five times as great.</p> <p>With regard to the assessment of the SG between Weston-super-Mare, Locking and Parklands Village set out in SD13, it is considered to be flawed in a number of respects. The weaknesses are reviewed briefly below</p> <p>Location of land in relation to the settlements</p> <p>The gap that it is sought to protect is very extensive. Inclusion of much of the area is unnecessary to maintain separation between settlements, and for reasons outlined earlier in this statement, is both contrary to sustainable development principles and unnecessary to do so since the land is already adequately protected.</p> <p>If a SG between Weston-super-Mare and Locking is necessary, then it need relate only to the immediate corridors between Locking Parklands and Locking and land east of the Oaktree Residential Park and Locking.</p> <p>Sense of the Gap</p> <p>There is little sense of gap between Haywood Village and Weston Business Park. The latter is perceived as part of the existing urban area of Weston-super-Mare from many</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>locations. It is only to the east and south-east of the business park that the complexion of land use becomes rural and the two settlements become distinct.</p> <p>Sense of leaving or arriving at a settlement</p> <p>The sense of leaving Weston is at the Laney's Drove Roundabout, which is the last roundabout on the A371 when heading east, and where the orientation of the A371 changes, and the complexion of land uses on either side changes from urban to rural. When approaching from Locking, the perception is that the Weston Business Park is the gateway to Weston since it represents a significant change in land use character from rural to urban business park and is seen in the context of the existing and new urban development to the north and west.</p> <p>The Council's assessment of the arrival and departure point from Weston-super-Mare is therefore considered to be incorrect. It is at the Laney's Drove Roundabout abutting the eastern boundary of the Weston Business Park, and this endorses their planning policy position that safeguards the existing business park and allocates additional land to meet Weston-super-Mare's employment land requirements. This being the case, if the SG is deemed to be necessary, it is only appropriately applied to land south east of the business park since that is the point at which Weston-super-Mare ends.</p> <p>Sense of place, perception of the separate identify of settlements, actual and perceived proximity of settlements</p> <p>The Council's assessment acknowledges the great significance of the part of the SG between Locking Village and Parklands Village owing to the very narrow gap between them (SD13, para. 5.6). However, it notes that the area south of Haywood Village is broken by areas of intervening development, including the helicopter museum/ employment premises and Oaktree Park (SD13, para. 5.7).</p>	

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		<p>The distinction acknowledged above reflects a difference in the character of land use. The area between Haywood Village and Oaktree Residential Park has a distinctly urban character and, for reasons outlined earlier, has been integrated with the urban area of Weston-super-Mare through the development of the urban extension at Haywood Village. It is only to the east of Oaktree Residential Park and south-east of Weston Business Park that the character of land use and settlement changes from urban to rural.</p> <p>The village of Locking therefore has a separate identify from Weston-super-Mare, which the land between Haywood Village and Oaktree Residential Park does not. Locking village has a sense of place entirely distinctive from Oaktree Residential Park which has been incorporated into the urban development of Haywood Village.</p> <p>Landscape setting of the settlements or parts of a settlement The area between Haywood Village and Oaktree Residential Park has few landscape features and is dominated by built development. It therefore does not provide a landscape context for either Weston-super-Mare or Locking and has an urban rather than rural complexion. To the east is agricultural land with trees and hedgerows.</p> <p>Distance As adduced earlier, the gap to the east of Oaktree Residential Park and south-east of the Weston Business Park is five times greater to the nearest part of Locking than the gap between Locking Parklands and Locking. If the latter is sufficient to provide strategic separation, the former is more than adequate.</p> <p>Topography There is little distinction in topography between Haywood Village and Locking.</p>	

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		<p>Vegetation The area between Haywood Village and Oaktree Residential Park is largely devoid of vegetation. To the east are hedgerows along field boundaries.</p> <p>Landscape character/type There is a clear landscape distinction between land to the east of Oaktree Residential Park and south-east of Weston Business Park, and that between Oaktree Residential Park and Haywood Village.</p> <p>Existing uses and density of buildings None of the land between Haywood Village and Oaktree Residential Park is in agricultural use. This is acknowledged in the assessment which classifies the park homes site, helicopter museum and adjoining employment building as ‘adjoining’ uses (SD13, para. 5.16). This clearly endorses the urban complexion of the land between Haywood Village and Oaktree Residential Park.</p> <p>Inter-visibility There is direct and unobstructed inter-visibility between Haywood Village and the helicopter museum/Weston Business Park. To the extent that Locking Village is visible, it is perceived as a separate settlement nestling in more verdant surroundings beyond the foreground urban development comprising the hanger buildings associated with the helicopter museum/business park defining the urban edge of Weston-super-Mare</p> <p>The perception from Haywood Village is that the countryside begins to the south-east of the business park.</p> <p>Overall Conclusions</p> <p>For all of the foregoing reasons it is concluded that there is no justification for including</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>land between Haywood Village, Weston Business Park and Oaktree Residential Park in the SG. It has an urban character and is perceived as part of the urban area of Weston-super-Mare, the edge of which is to the east of Oaktree Residential Park and south-east of Weston Business Park. This should be reflected in an adjustment to the settlement development boundary.</p> <p>If there is any justification for a SG to maintain the separation between Weston-super-Mare and Locking, it should be restricted to the significant land area south of the A371, east of Oaktree Residential Park and south-east of Weston Business Park. If a 50 metre gap between Parklands Village and Locking is sufficient to constitute and maintain strategic separation, then a gap that is at least five times greater provides indisputable protection to Locking. There is no credible justification for including land between Weston Business Park and Oaktree Residential Park in the SG. It serves no purpose in maintaining the separateness of Weston-super-Mare and Locking. Moreover, in physical and land-use terms, it is already part of the urban area of Weston-super-Mare and is therefore inappropriately included in the SG and would be contrary to the sustainable development policies of the Plan to do so.</p> <p>REQUIRED CHANGES</p> <ul style="list-style-type: none"> • Amendment of the Policies Map to exclude from the Weston/Locking Strategic Gap the land between Haywood Village, Weston Business Park and Oaktree Residential Park. <p>PLEASE SEE ATTACHMENT FOR APPENDICES</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>MM2: POLICIES SA4, SA5 AND SUPPORTING TEXT OBJECTION</p> <p>MP welcomes the consolidation of Policies SA4-6 into a single policy. However, as currently worded, it is too restrictive and is inconsistent with achieving the Core Planning Principle in the NPPF to ‘encourage the effective use of land by reusing land that has been previously developed’, and the associated objective to ‘avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose’.</p> <p>Instead of compliance being required with ‘all’ of the policy criteria through inclusion of the word ‘and’ between each one, the word ‘and’ should be replaced with ‘or’. For example, if a proposal would not harm the range or quality of land and premises available for business use, then there is no reason why it should not proceed since there is no harm to the objective to ensure the provision of suitable range and quality of land and premises. Equally, if there is a specific requirement associated with neighbouring business uses that justifies a proposal, then it should not have to clear the other policy hurdles by which it may well be excluded.</p> <p>REQUIRED CHANGES</p> <ul style="list-style-type: none"> • Amend policy SA4 to omit the word ‘and’ and insert the word ‘or’ between criteria 1-4. 	
Mactaggart & Mickel Homes (Rocke Assoc)	11936993//1	<p>MM1, MM4-MM32 : Table 1, Schedule 1 and Policies Map OBJECTION</p>	 Rocke MM.pdf (3.5 MB)

Respondent Name	Comment ID	Comment	Attached documents
		<p>The Proposed Modifications fall well short of the Inspector’s clear requirements for a buffer based on 20% of the residual housing requirement which would call for sites to accommodate some 2,500 additional units. Her advice to the Council was quite clear that: <i>... if the SAP is adopted in its current form with the high level of uncertainty as to the deliverability of allocated sites and in particular the need for more sites that can be developed within the next five years, it would fail to deliver the CS requirement or to ensure that the Council can maintain a 5 year housing land supply. Sources from which additional allocations can be sought have already been identified by the Council, and some preliminary work is being carried out to test suitable sites. Having regard to the urgent need to boost the supply of housing, I consider that the Council should test a potential for the provision of up to 2,500 additional houses in order to identify the environmental costs of allocating a wider choice of housing sites. Furthermore, where new allocations are to be made, there is a need to identify and allocate sites which can be made available for development at an early date to help meet the five year supply as well as secure the overall delivery of the housing requirement by 2026.</i></p> <p>There is no evidence whatsoever that the Council has ‘tested the potential’ of up to 2,500 additional houses, and identified, through sustainability appraisal, the ‘environmental costs’ of meeting it. There is no robust consideration and rejection of potential options on environmental grounds. On the contrary, the Council has simply selected a number of sites on the basis of a cursory screening against the provisions of the Core Strategy and tested those. The sites that have been tested have not had the cumulative capacity to deliver the 2,500 additional houses recommended by the Inspector. The ‘potential’ has therefore not been tested, and therefore the Council has not done what the Inspector required them to do.</p> <p>MM have been party to the preparation of, and fully endorse, the Joint Response of the Development Industry to the Proposed Modifications. They will not reiterate the points raised in that Joint Response, but would highlight the following elements of it:</p>	

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		<ul style="list-style-type: none"> • Through the supporting documentation (CD2), the Council inappropriately sought to re-open the debate on the additional quantum of housing to be provided. This has caused the Council to neither test, nor meet, the Inspector's requirements, rather than their failure to make additional provisions to meet it being a reflection of unacceptable conflict with the Core Strategy, or environmental costs, of doing so. • The process has failed to identify provision for an additional 2,500 units and, <i>ipso facto</i>, to demonstrate that the implications of doing so would be a plan that fails to comply with the Core Strategy and/or give rise to unacceptable environmental costs, in accordance with the clear requirements of the Inspector. <p>For reasons that are set out in specific response to MM14, there are additional sites that are compliant with the qualifying criteria identified by the Council⁴ that can contribute further to achieving the Inspector's requirements without either conflicting with the Core Strategy or giving rise to unacceptable environmental costs.</p> <p>REQUIRED CHANGES</p> <p>The following changes are required:</p> <ul style="list-style-type: none"> • Identification of additional sites that will meet the Inspector's requirements to enable the consequences of doing so to be properly tested. ? • Allocation of additional suitable sites, such as the whole of the omission site north of Youngwood Lane at Nailsea, to bring the Plan into line with the Inspector's clear requirements. 	

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		<ul style="list-style-type: none"> <li data-bbox="613 328 1541 427">• Absent the above, the Plan is unsound, and the Inspector is requested to convene further Examination sessions to undertake her own investigation of the merits of omission sites that could enable her requirements to be upheld. <p data-bbox="539 467 786 528">MM14 - Schedule 1 OBJECTION</p> <p data-bbox="539 568 1568 775">MM welcome and support the inclusion of part of their omission site north of Youngwood Lane as a new residential allocation. However, they object to the failure to identify the whole of the site north of Youngwood Lane as an additional allocation. For reasons set out below it is MM's submission that the evidence from the Council's own site assessment confirms that there is no reason not to allocate the entire site, and that it complies with the broad criteria justifying selection.</p> <p data-bbox="539 815 1552 986">MM welcome the acknowledgement in the consultation documents, in CD2a and the further site assessment, that the allocation of their omission site north of Youngwood Lane, Nailsea (CD2a, ref: 16/P/1677/OT2) would be broadly in accordance with the Core Strategy framework. Moreover, as is clear from the further site assessment, there are no overriding technical or environmental constraints relating to its development.</p> <p data-bbox="539 1026 1559 1302">The further assessment suggests that the delivery programme is ambitious, requiring outline planning permission to be granted in October 2017. However, it is within the Council's gift to facilitate that programme since the application is ready for determination. A six month period for the submission of reserved matters following outline approval is entirely realistic and achievable, and the Council's target for the determination of any such application is 13 weeks. Therefore, subject to facilitation by the Council, the site has good and realistic potential to deliver a significant quantum of housing within five years, and to yield its full capacity well within the plan period. It</p>	

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		<p>therefore has the potential to achieve both of the objectives sought by the Inspector in identifying the uplifted requirement.</p> <p>The only constraint identified in the further assessment is that the site is being considered for strategic development through the JSP, and the infrastructure requirements for the land have yet to be identified. The suggested mitigation for this is to avoid allocating the site through the SAP as a standalone allocation.</p> <p>This might only be a legitimate reason for not allocating the site through the SAP if two circumstances prevailed. First, the provisions of the JSP had reached a stage at which they could be afforded weight in planning decisions. Second, if the Council's evidence confirms that they have alternative sites that are broadly compliant with the Core Strategy framework sufficient to deliver the uplifted requirement. Neither of those circumstances prevails.</p> <p>In accordance with the provisions of the NPPF (paragraph 216), the provisions of the JSP can be given no weight at the present time since they are at a very early stage in their preparation, and are no more than aspirational. They could be subject to significant change. Just as the Council is likely to afford the provisions very little weight in determining planning applications that might come forward premised on the draft strategic growth locations, equally the Council can give them very little weight in considering potentially suitable sites to meet housing needs during the current plan period. If there is an immediate need for which provision cannot be made elsewhere, and the site is otherwise suitable, then it should be allocated in the current plan. Those circumstances pertain to MM's site north of Youngwood Lane.</p> <p>With regard to the second issue, the Council is making provision for only approximately 821 additional homes. This amounts to only approximately one-third of the additional requirement, and indicates their view that the residual need cannot be accommodated</p>	

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		<p>elsewhere whilst maintaining conformity with the Core Strategy. Given this outstanding requirement, to which MM's omission site can make a significant contribution, together with the Council's acceptance that its allocation would be in broad compliance with the Core Strategy, and balancing these considerations against the potential future strategic allocation to which little, if any, weight can be given in planning decisions at the present time, the only appropriate conclusion that can be drawn is that the whole site should be allocated to meet housing needs arising during the current plan period.</p> <p>Given the early stage of the JSP, any issue of prematurity simply does not arise within the terms set out in the NPPF (para. 216). Any implications for future growth therefore cannot be given any weight in deciding on a potential allocation that is necessary to meet the growth requirements during the current plan period, or in determining the current application. It would be perverse, and indeed onerous, to expect sites that are in broad conformity with the current strategic framework, as the further site assessment confirms the omission site north of Youngwood Lane to be, to also be in conformity with future strategic aspirations that have yet to be crystallised even into a draft Plan, let alone subject to Examination. It is therefore untenable to suggest that sites that are in conformity with the current Core Strategy, and needed to meet its requirements, should not be allocated simply because they might be inconsistent with future strategic aspirations to which no weight can be given at this time. Moreover, this reasoning, were it to be tenable, would apply equally to the proposed allocation at Engine Lane, Nailsea. Were the Council to avoid allocating the site through the SAP as a standalone allocation in favour of it being brought forward as part of a future strategic development area, as foreshadowed in the further site assessment, there would, in consequence, be an inconsistency with the position assumed in relation to the proposed allocation at Engine Lane, which is also in the future strategic development area foreshadowed in the emerging JSP.</p>	

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		<p>Given that the site is on the south-eastern fringe of the future strategic development area, there is no reason why it cannot be developed in isolation without prejudicing future strategic development if that is confirmed as the JSP progresses. Moreover, in discussions with the Council, the only reason given for not allocating the whole site at the present time has been the need to protect a possible future route for the Metro Bus through the southern part of the site. However, given that the intention is to route the Metro Bus through future residential areas, and that the Masterplan accompanying the current live application (Ref 16/P/1677/OT2) for outline planning permission for development of the site for up to 450 dwellings is for illustrative purposes only, it would be possible, for a period of time that reflects the anticipated schedule for publication of the JSP, to safeguard the opportunity to provide a future public transport link through the site as part of the policy provisions in the SAP and terms according to which planning permission is granted for the current outline application. The route, if it materialises, could then be incorporated into any detailed reserved matters submissions in due course, assuming that it is confirmed through the ongoing JSP work within the trajectory for publication of the draft Plan.</p> <p>In the light of the above, the only potential constraint on the allocation of MM's omission site north of Youngwood Lane that is identified in the further site assessment is not a sound reason for resisting its allocation. Given the compelling need to allocate additional sites to meet the additional requirement, and the broad conformity of the north of Youngwood Lane site with the Core Strategy framework, the overwhelming weight of the evidence is in favour of its allocation.</p> <p>The position can therefore be summarised as follows:</p> <ul style="list-style-type: none"> • MM's omission site north of Youngwood Lane, Nailsea is needed in its entirety as part of the additional provisions that the Inspector has held must be 	

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		<p>made in the SAP to ‘meet’ the growth requirements during the current Core Strategy period.</p> <ul style="list-style-type: none"> • The site accords with the priority site selection criteria endorsed by the Inspector for allocations to provide for the additional requirement that she has held must be identified in the SAP. • No weight can be given to any future strategic growth aspirations which have yet to be formalised in a draft Plan let alone subject to Examination, and any alternative approach to MM’s site in this respect would be unjustifiable and untenable given its inconsistency with the proposed allocation in the SAP at Engine Lane • The entirety of MM’s site north of Youngwood Lane should be allocated in the SAP now. If considered necessary and justified by the available evidence, suitably worded provisions could be agreed to make adequate and reasonable safeguards to accommodate the possibility of a future metro bus route through the site, subject to that route being confirmed within a prescribed time period. <p>Notwithstanding the foregoing considerations, which are of sufficient weight to justify allocation of the entire omission site north of Youngwood Lane at the present time, there are inherent risks and uncertainties associated with the partial allocation as currently proposed by the Council. One of the sensitivities of developing land to the south-west of Nailsea relates to biodiversity, and in particular, the need to mitigate against potential impacts on the protected Bats SAC. Indeed, this was one of two issues that caused the Secretary of State to direct that the application should be accompanied by an Environmental Impact Assessment, along with potential impacts on off-site heritage assets. The overall scheme has been carefully conceived with embedded mitigation in the form of substantial green infrastructure and corridors to ensure that the</p>	

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		<p>impacts on both the bat populations and heritage assets are acceptable. This is illustrated on the Masterplan accompanying the outline application, a copy of which is included at Appendix 1 to these representations. This acceptability of the impacts of the development with the embedded mitigation proposed has been confirmed through the Environmental Impact Assessment and endorsed by both Natural England and Historic England, and indeed, through HRA it has been confirmed that there is a net gain in biodiversity terms. There is no evidence or assessment to confirm the mitigation that would be necessary with partial development of the omission site, or the implications in terms of the capacity of 170 dwellings on which the Council is reliant to be delivered from it.</p> <p>In the 'Site specific details/notes' it is simply stated 'ecological issues to be addressed on a strategic basis as part of any future wider development'. It is assumed that the reference to 'future wider development' is a reference to the emerging aspirations in the JSP. However, this is problematic since it implies constraints on developing the site at least in advance of future strategic proposals and an approach to mitigation being identified, and potentially implemented. This augers against delivery of the allocated site within the period to 2026, let alone within the five year period following adoption of the Plan.</p> <p>In addition to the above it is germane that the foul sewer into which the proposed development is intended to connect is located in Youngwood Lane adjacent to the southern boundary of the overall omission site promoted by MM. Given that the overall omission site is in two ownerships, with the boundary between ownerships coinciding largely with the boundary of the proposed allocation, it would mean a drainage connection crossing third party land. The alternative would be a pumped connection northwards back towards the existing urban area, which is far less acceptable for a development of that size than gravity flow.</p>	

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		<p>A further consideration is that the overall development is proposing a new route through the site as an alternative for through-traffic to that section of Netherton Wood Lane that currently borders the western boundary of the omission site. This benefit would not be secured absent a comprehensive scheme based on the overall omission site.</p> <p>Finally, Youngwood Lane provides a logical and defensible southern boundary to the new development area and for the extended town. Partial allocation of the site would result in a southern boundary that would be liable to considerable encroachment, and in consequence leave a residual parcel of agricultural land to the south which becomes unviable and untenable for continued agricultural use due to encroachment and trespass by the immediately adjacent residential community.</p> <p>For all of the foregoing reasons it is MM's view that the omission site should be allocated in its entirety, and there is no reason not to do so given the requirement for additional housing land.</p> <p>REQUIRED CHANGES</p> <ul style="list-style-type: none"> • Amendment of Schedule 1 and the Policies Map to extend the proposed allocation north of Youngwood Lane, Nailsea to include the entire omission site promoted through the SAP in earlier representations by MM, as identified on the Site Location Plan included with these representations at Appendix 2. <p>SEE ATTACHMENT FOR FULL APPENDICES</p>	

Respondent Name	Comment ID	Comment	Attached documents
Historic England (R Torkildsen)	12476353//1	<p data-bbox="539 327 1491 429">Thank you for providing an opportunity to consider proposed modifications. Our comments relate to the additional allocations and also reemphasise our concern regarding the Birnbeck Pier allocation.</p> <p data-bbox="539 467 1563 639">Our response is mindful of the need for local plans to set out a positive strategy for the conservation and enjoyment of the historic environment, and that special regard should be paid to the desirability of preserving or enhancing designated heritage assets. (NPPF paragraphs 126, and 132 and the Planning (Listed Buildings and Conservation Areas) Act 1990).</p> <p data-bbox="539 678 1559 815">We would emphasise the importance of local authority needing to clearly demonstrate that the approach to development affecting designated and non-designated heritage set out in this Plan is justified, consistent with national policy, and likely to be effective in helping to deliver sustainable development.</p> <p data-bbox="539 853 1451 882">Evidence base to inform a positive strategy for the Historic Environment</p> <p data-bbox="539 920 1563 1093">It will be critical for the local authority to present, for consideration, adequate evidence (in accordance with NPPF paragraphs 129, 158 and 169) that demonstrates an appropriate consideration of the impact of each relevant additional allocation (and the Birnbeck Pier site, as previously emphasised) to determine the level of effect (harm) to the significance of affected heritage assets and their setting.</p> <p data-bbox="539 1131 1514 1233">The statutory development should not defer the need for further work to determine issues of significant importance that really need to be dealt with at the plan making stage.</p> <p data-bbox="539 1272 1570 1337">Before the principal, the future form and capacity of each site can be established, great weight must be applied to the conservation of the affected heritage assets in accordance</p>	

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		<p>with NPPF paragraph 132. A lack of evidence would suggest that great weight has not been applied and therefore that the Plan has not been justified (based on proportionate evidence) or accords with national policy nor the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that considerable importance and weight (special regard) is given to the desirability of preserving the setting of listed buildings. As planning decisions need to be taken in accordance with the development plan there needs to be a reasonable degree of certainty that a future application is deliverable. Is there a reasonable degree of certainty that allocations affecting listed buildings would satisfy Section 66?</p> <p>In selecting the sites allocated for development, has North Somerset Council paid special regard to the desirability of preserving or enhancing designated heritage assets (Planning (Listed Buildings and Conservation Areas) Act 1990 and NPPF paragraph 132)?</p> <p>National policy seeks to protect and or enhance where appropriate the significance of heritage assets. Only where harm is unavoidable should mitigation be considered (NPPF paragraph 152). Any harm and mitigation proposals need to be fully justified and evidenced to ensure they will be successful in reducing harm. The local authority will therefore need to provide sufficient evidence to establish the level of impact / harm, and if harm were unavoidable, the justification.</p> <p>Historic England believes it is reasonable to expect a specific and moderately detailed heritage report – as evidence - that assesses whether, how and to what degree the setting of any effected heritage asset makes a contribution to its significance; and demonstrates the assessment of the effects of the proposed allocation on that significance to determine</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>whether measures to maximise enhancement and avoid or minimise harm might be effective.</p> <p>Deferring an impact assessment to a future planning application stage is not considered appropriate as fundamental heritage considerations may affect the principle of development, its form and quantum, and as a consequence, its deliverability i.e. informing whether the allocation is justified. As such, when allocating a strategic site, North Somerset Council needs to set out clearly the type and amount of development that would be acceptable and provide details on how any affects to heritage assets can be addressed. The brief commentary provided so far in respect of the impact of allocations in the Plan lacks detail or demonstrable rigour.</p> <p>The NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment and conserve heritage assets in a manner appropriate to their significance (NPPF paragraph 126). In terms of potential site allocations, we would suggest this means identifying sites for development which are compatible with the requirements of national policy for the delivery of sustainable development. At present the local authority has not demonstrated this would/could be the case in a substantive way.</p> <p>We hope our comments will help to support the local authority in its preparation of a sound, robust and effective Site Allocations Plan and in so doing secure the delivery of sustainable development. At present there are important matters to be resolved for Historic England to be confident that the Plan accords with national planning policy.</p> <p>Yours sincerely</p> <p>Rohan Torkildsen</p>	

Respondent Name	Comment ID	Comment	Attached documents
		Historic Environment Planning Adviser for the South West and West Midlands	
Gallagher estates	14401409//1	<p>We write in relation to North Somerset Council's Site Allocations Plan - Main Modifications Consultation on behalf of Gallagher Estates who own land at Pill Green.</p> <p>The comments previously provided on behalf of Gallagher Estates as part of the Site Allocations Plan - Further Site Assessments Consultation (dated 21st August 2017) remain valid and are maintained. These are enclosed for reference.</p> <p>We hope and trust that these comments can be considered as part of the continued preparation of the plan. Please let me know if you require any further information.</p> <p>PREVIOUS RESPONSE ATTACHED</p>	 Gallagher.pdf (251 KB)
Edward Ware Homes	14402625//1	<p>Sites and Policies Plan Part 2: Site Allocations Plan: Main Modifications Consultation – Land south of Bristol Road, Langford Town and Country Planning Act (Local Planning) (England) Regulations 2012</p> <p>We write on behalf of our client, Edward Ware Homes (EWH), to make representations to the Proposed Main Modifications to the Sites and Policies Plan Part 2: Site Allocations Plan (SAP) prepared by North Somerset Council (the Council).</p> <p>EWH have a land interest on land to the south of Bristol Road, Langford which is the subject of a current outline application (17/P/1200/O) for up to 41 dwellings and is one</p>	 EWH.pdf (4.3 MB)

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		<p>of the additional sites proposed for allocations as part of the SAP Main Modifications. Our clients EWH also have a further land interest at Langford. Site Location Plans for both sites are provided at Appendix 1 of this letter.</p> <p>APPENDIX 1: SITE LOCATION PLANS</p> <p>These representations expand upon representations made previously in respect of the SAP. Accordingly, these representations consider the following issues:</p> <ul style="list-style-type: none"> • Background to SAP Examination; • Additional Site Selection; • Deliverability of Identified Sites; • Paragraph 14 – Plan Making; • MM1 – Policy SA1 and supporting text; • MM26- Land to the south of Bristol Road, Churchill; and • Land to the south of Langford, Bristol. <p>Background</p> <p>The Council submitted the SAP for examination on 24th February 2017. The SAP underwent examination by the Planning Inspectorate from 16-18 May 2017. Following the close of the hearings the Inspector (Ms Wendy Burden) wrote to the Council on 26th June 2017 setting out further work that she considered necessary in relation to the delivery of housing.</p>	

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		<p>To secure the delivery of Core Strategy (CS) Policy CS13, the Inspector considered the need for the Council to test the provision of additional sites for up to 2,500 homes within the SAP. Specifically, she noted:</p> <ul style="list-style-type: none"> • <i>“The additional sites for up to 2,500 dwellings are not a proposal to increase the overall housing target identified in Policy CS13.</i> • <i>The identification of additional sites would help to provide flexibility and certainty that the CS housing requirement can be met since:</i> <ul style="list-style-type: none"> o <i>Due to constraints on sites allocated in the SAP it is not certain that they will be developed by 2026;</i> o <i>Additional sites are required to make up for those which are unlikely to be delivered.</i> • <i>The increased choice and flexibility provided by additional allocations in the SAP would assist the Council in demonstrating that they have a fiveyear housing land supply.”</i> <p>The Inspector made other conclusions regarding the application of the Sedgefield methodology and appropriateness of a 20% buffer for persistent under delivery which are of relevance.</p> <p>All the above point to the Inspector’s concerns that the sites identified within the submitted SAP draft are heavily constrained and additional sites, up to 2,500 new homes, should be considered to ensure there is sufficient choice and flexibility.</p> <p>Within the letter the Inspector also notes that the Council has agreed to test three areas for additional allocations:</p>	

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		<ul style="list-style-type: none"> • “Sites which are broadly consistent with the Core Strategy spatial strategy (sites within or adjacent to Weston, the towns and service villages, but not infill villages, countryside or Green Belt). • Sites which have been considered through the SAP examination process. • Sites which are in the development pipeline – as these are more likely to be deliverable and could potentially contribute to 5 year supply.” <p>Additional Site Selection</p> <p>It is clear from the discussion above that the thrust of the Inspector’s comments were to consider potential additional sites for up to 2,500 additional units. However, the Council’s approach as outlined within paragraph 3 of their letter to the Inspector dated 26th June 2017 the Council considered it necessary to create a “clear cut-off”. We consider this was a fundamentally flawed approach as it restricted the range of options that could potentially be considered by the Council to only those already within the system (i.e. live application or pre-application). We consider that the Council should have made a formal call for sites at that point so as to allow a wider range of sites to be considered.</p> <p>The Council could have then proceeded with an initial sift which would have excluded any sites which had been submitted which weren’t “broadly consistent with the Core Strategy spatial strategy.”</p> <p>As a result of this constrained assessment methodology, the phase 2 assessment contained options which allowed for a potential additional 1,812 new homes across 28 sites. This figure is clearly significantly short of the 2,500 figure which the Inspector asked the Council to consider.</p>	

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		<p>The reassessment work culminated in a reduction of 6 sites from the 28 and a recommendation to allocate the remainder which would boost the allocation total by an additional 821 dwellings.</p> <p>MM1 – Policy SA1 and supporting text</p> <p>Table 1 of the October 2016 Publication Version SAP sets out the projected housing delivery across the plan period, comprised of completions, allocations, sites with planning permission and a windfall allowance, and is supported by a spreadsheet, referred to as CD1a, showing the projected annual delivery of these sites.</p> <p>Whilst the identified supply figure of 21,051 homes, if deliverable, meets the Core Strategy OAN, it does not meet the total plan period requirement when the under-delivery to date and a 20% buffer over the next five-years are applied in line with the Inspector’s recommendations. Indeed, with reference to our table below, when the past shortfall and the buffer are included the overall housing need across the plan period rises to 23,616.</p> <p>It is for this reason, together with some uncertainty about the deliverability of the sites already identified (most notably the delivery trajectories advocated by the Council at Weston Villages strategic allocation), that the Inspector considered that additional land should be allocated for a further 2,500 homes through the Main Modifications process. However, the Council has as noted above only found additional land for 821 new homes.</p> <p>SEE ATTACHMENT FOR TABLES</p> <p>As shown in row H of the table, the result of this failure to respond to the Inspector’s request means that the identified supply in the SAP for the remaining plan period</p>	

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		<p>remains well below the actual requirement, undermining the delivery of the Core Strategy to 2026.</p> <p>In fact, due to a revised “lapse-rate”¹ and review of the rate of delivery of existing sites (‘commitments’), the identified supply for the remaining plan period has actually shrunk from 13,849 to 13,438. The shortfall is therefore 1,331 dwellings.</p> <p>Critically, the Main Modifications also fail to address the uncertain deliverability of the plan in the short term, over the next five years. The supporting annual trajectory has been updated and is referred to as CD4a. Although all of the new allocation sites found for the additional 821 homes are projected to be delivered within the next five years, this document shows a total 5-year supply of 9,149 homes, and therefore that there is still not enough housing to meet the authority’s five-year housing need of 9,524. The failure of the Main Modifications and supporting evidence to demonstrate a five-year housing land supply renders the SAP unsound.</p> <p>Deliverability of Identified Sites</p> <p>For the purposes of simplicity in comparing the SAP identified housing supply with the Inspector’s request, the above discussion assumes that the Council’s housing trajectory is reliable.</p> <p>However, whilst the projected supply of 9,149 homes versus our identified need of 9,524 equates to a 4.8-year housing land supply, our view is that this is not a wholly accurate figure because the trajectory is over-optimistic.</p> <p>We agree with other representations, including that made by Neil Tiley of Pegasus Group (Hearing Statement ref. HS-2-1a) in the examination hearings, that the deliverable supply from existing commitments and originally identified site allocations</p>	

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		<p>is less than identified by the Council due to a combination of site-specific constraints and unachievable projected build-out rates on strategic sites.</p> <p>‘Paragraph 14’ Plan-Making</p> <p>For these reasons, more work needs to be done to identify further sites which are available, suitable and deliverable over the next five years and the remainder of the plan period to meet the identified housing requirement.</p> <p>The ‘Presumption in Favour of Sustainable Development’ established in paragraph 14 of the NPPF should be seen as the ‘golden thread’ in the planning process:</p> <p>“For plan-making this means that:</p> <ul style="list-style-type: none"> • <i>Local planning authorities should positively seek opportunities to meet the development needs of their area;</i> • <i>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or – specific policies in this Framework indicate development should be restricted.”</i> <p>MM26 - Land south of Bristol Road, Churchill</p> <p>Pegasus made representations on this site in August 2017 and a copy of these representations are appended to this statement at Appendix 3:</p>	

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		<p>EWH are pleased that their land interest on land south of Bristol Road, Langford is proposed for allocation for 41 residential units. The site is highly sustainable and readily available for residential development.</p> <p>Whilst it is positive that the site is to be allocated, the Council proposes a site allocation boundary which is less than that defined by the application site area. We have undertaken a comparison of the two redlines and this is provided at Appendix 3.</p> <p>It is understood from the Councils Executive Report (5th September 2017) and from discussions with officers during the on-going planning application that the reasoning for this is associated with the A38 being identified as a key strategic corridor linking the airport with Bristol, the M5 and Weston-super-Mare as part of the on-going work associated with the West of England Joint Spatial Plan and Joint Transport Study. The Council have indicated that the reduction in red line is to safeguard land adjacent to this network so as not to restrict the ability for the highway to be improved.</p> <p>At the time of writing these representations the Council have confirmed that the proposed reduction in red line has not been informed by any transport modelling work or assessment and as such is their best estimate of what might be required. It is also clear that at present there are no defined proposals for what any upgrade of road infrastructure might include and nor is the residential growth, in the form of a new garden village, certain.</p> <p>Our representations in August were accompanied by an opinion from TPA and we again append this opinion to this statement.</p> <p>As the assessment notes the site has been the subject of pre-application engagement and is now the subject of a planning application (ref 17/P/1200/O). The pre-application</p>	

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		<p>meeting and feedback was provided in early January 2017 with the application validated on 15th May 2017.</p> <p>Both activities followed the West of England Joint Spatial Plan: Towards the Emerging Spatial Strategy consultation which ended on 19th December 2016. Indeed, the preapplication response referred to the fact that this site was located within an area identified for potential new transport infrastructure. The pre-application response did not discourage an application based on potential conflict with the JSP.</p> <p>The key point is that the JSP identifies the site as being within an area potentially required to deliver new transport infrastructure. The JSP is still at an early stage with many components, including projects identified within the Emerging Joint Transport Strategy, having limited detail or information provided about them to ascertain detailed requirements or land needs.</p> <p>As noted above further detailed considerations on transported related matters are considered by our transport consultants which is appended to this statement. In summary, the key points are:</p> <ul style="list-style-type: none"> • The alignment of a new road around Churchill/Langford, if indeed it is required, has not yet been determined and any alignment shown within consultation documents to date are indicative. Indeed, to deliver meaningful improvements to the width of the A38 the Council would have to Compulsory Purchase a number of existing properties. • The JSP also highlights the possibility of a new Junction 21A on the M5 with a new strategic connection between the M5 and Churchill. There is no commitment to the nature of these improvements or when they would be delivered. 	

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		<ul style="list-style-type: none"> • The assessment confirms there are “no anticipated highway capacity issues” with the highway network associated with the site a point shared by the Transport Statement accompanying the current application. As such improvements are not required now or in response to the current application. • There is no mention of the need for improvements at the junction or for a ‘bypass’ around the village in the Joint Local Transport Plan (LTP), dated March 2011. • The site assessment suggests that ‘existing highway bordering the site may influence development potential, particularly taking into account future potential for any works to this junction.’ Initial design and capacity assessment work suggests that the junction between the A38, A368 and Dinghurst Road is currently operating within capacity. <p>Our transport consultants (TPA) prepared two indicative junction arrangements which can both be accommodated within available land (highways or Parish Council) and these are provided at Appendix 5:</p> <ul style="list-style-type: none"> • Option 1: larger signalised junction (Ref: 1610-97_SK04); and • Option 2: a roundabout junction (Ref: 1610-97_SK05). <p>These junctions were designed following junction modelling work. The existing signalised junction between the A38, A368 and Dinghurst Road was modelled in LinSigv.3 with:</p> <ol style="list-style-type: none"> i. Signal timings/phasing and junction layout obtained from NSC; ii. Saturation flows based on geometries; 	

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		<p>iii. Optimised as it would in reality due to the presence of MOVA;</p> <p>iv. 2015 recorded traffic flows at the junction growth to 2017 using TemPRO;</p> <p>v. An additional 20% background traffic added to base flows on all arms of the junction to account for JSP growth on the A38 corridor. This is considered to be significantly over and above typical TemPRO growth for the area to 2036.</p> <p>Based on the above parameters, the existing signalised junction arrangement is forecast to operate over capacity in the 2036 PM peak scenario. As such, we considered potential junction improvements using land within the control of NSC, Highways England and Churchill Parish Council. This resulted in the attached improved signalised option (see attached 1610-97/SK04, now including dimensions, as discussed) and a roundabout option (1610-97/SK05).</p> <p>The signalised option shown at SK04 includes additional and/or longer lanes on all arms of the junction and changes to the signal timings. This demonstrates that a two-lane approach on the A38 Bristol Road can be provided without the need for additional land within the application site. As a result, the junction is forecast to operate within capacity in the 2036 AM and PM scenarios.</p> <p>It is clear that following the modelling work undertaken by our consultants that even in the scenario where all of the growth as currently envisaged as potential by the current consultation version of the JSP occurs up to 2036, the A38, A368 and Dinghurst Road junction operates within capacity with the exception of it being over capacity in the 2036 PM peak scenario. However, improvements to the junction can be made using Highways England, Highway Authority and Parish Council land is used in either of the two scenarios' that we have prepared. These options do not require any land take from the application site.</p>	

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		<p>Given the conclusions of this work there should be sufficient confidence to ensure that there is no need to reduce the red line as the Council is currently proposing, which as discussed above is based on no formal technical assessment.</p> <p>Land to the south of Langford, Bristol</p> <p>This site is located to the south of the village of Langford settlement boundary. The proposed site is south of the southern fringe of Langford, which forms part of the settlement of Churchill as defined by the Core Strategy. It is understood that this land has not previously been promoted or assessed by the Council. However, it is now available for development.</p> <p>As the Council is aware our clients have successfully secured consent on land to the west of Says Lane, Langford for 43 dwellings and have a further application pending (17/P/1200/O) for 41 units which has been discussed above and is proposed for allocation.</p> <p>We believe both sites to be suitable for residential development and this third parcel of land would be complimentary to these other sites. Churchill is identified as a Service Village within the settlement hierarchy and as such is a suitable location for residential growth, due in part to the range of services and facilities available within the village.</p> <p>It is acknowledged that this parcel of land is closer to the boundary of the AONB than EWh's other land interests at Churchill. EWH have already begun preparatory work for a landscape assessment of the site and this will underpin any future site layout option for the site.</p> <p>The Council has been asked by the Inspector to consider the identification of sufficient land to accommodate 2,500 for allocation, The Inspector in making these</p>	

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		<p>recommendations has sought to boost the supply of housing and increase flexibility and choice.</p> <p>We believe that the Council should have undertaken a more thorough assessment and review of opportunities in and around its most sustainable settlements to understand what their capacities might be to accommodate additional development. With the key focus being on identifying the least environmentally sensitive and those which are best related to the adjacent settlements.</p> <p>We believe that a greater strategic overview needs to be taken and from this viewpoint sites such as this offer a credible option to deliver significant proportions of development.</p> <p>Sites like this can be designed in such a way to link into the existing sites and given our client's other land interests at Churchill this can be easily achieved.</p> <p>Conclusion</p> <p>We report that the Main Modification MM1 to policy SA1 and supporting text of the SAP fails to adequately address the housing need and that further site allocations are needed to provide a source of supply for delivery over the remaining plan period, and critically for the next 5 years.</p> <p>Whilst we are supportive of Main Modification MM26 which allocates EWH site on land south of Bristol Road, Churchill we consider that no valid justification has been provided to justify for a reduced red line. In fact, the modelling work we have undertaken clearly demonstrates that the existing junction can be improved to account for the forecast level of growth using land not associated with the application site.</p>	

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		<p>The EWH site on land south of Langford is readily available for residential development and had the Council taken a less restrictive approach to potential land availability, sites such as this would have been made available by land owners/promoters and the Council would have got significantly closer to meeting its existing shortfall.</p> <p>We would be pleased to provide any further information and would welcome the opportunity to discuss the site in more detail. We also request to be kept informed of any updates to the examination process, including the opportunity to make verbal representations at hearing should it arise on behalf of our client.</p> <p>SEE ATTACHMENT FOR APPENDICES</p>	
Vic Slater	14402657//1	<p>Dear Sir,</p> <p>Firstly, I would like to know how central government arrived at the number of homes they feel are needed. We are talking about needs, rather than desires, which is a completely different matter.</p> <p>I am sure this information has been cascaded down to North Somerset and I would be interest in hearing how the need was arrived at. Would you please advise?</p> <p>When the figure for housing needs was arrived at, there wasn't any hint of BREXIT and no doubt a substantial part of the calculation must have taken account of the number of expected imigrants settling in the UK but as this figure is now likely to be substantially reduced, how has this been factored in to a revised figure. Would you please advise me?</p>	

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		<p>When the announcement to build more houses was announced by Mr Cameron, it was also perceived as being a kick start to the economy. Building new houses is a sure way to get the economy going. We are all aware that there is a need for additional housing in the UK but have the numbers been over exaggerated?</p> <p>Based on what I have read within the consultation document, it seems to me that when the Inspector asks for numbers, ways are sought to squeeze the sponge dry in order to comply.</p> <p>I live in Winscombe and have looked at the sites within the Winscombe and Sandford Parish. It seems that Coombe Farm and Shipman Lane have both previously been refused on appeal. If this is so, what makes them any different now? Surely principles remain the same. Both of these sites have pockets of land within the AONB and the proposal appears to be to adapt these sites by removing the parts that are AONB from the site simply to satisfy the Inspectors requirement. Most of the sites identified within Winscombe and Sandford are either Greenfield, AONB (in part at least) or outside of the Settlement Boundary, all of which three/four years ago would have been ruled out. What has changed to make this now happen, apart from a demand for new homes that we possibly can't be sure is totally accurate?</p> <p>Referring now to the Joint Spatial Plan. I would make the point that in order to accommodate the level of housing required, an infrastructure needs to be in place. Bristol is the hub which provides the infrastructure and therefore it would make sense to build out from the City rather than trying to infill in villages some 20 miles away that don't have the benefit of additional employment or an adequate road network, not to mention an adequate number of schools, surgeries etc., etc. Bristol has hospitals, shopping centres, entertainment etc. as well as employment. By trying to build in the villages simply puts added pressure on the roads as they currently exist (a point in question is Banwell, which takes traffic from Winscombe, Sandford, Churchill and</p>	

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		<p>other surrounding areas). In addition to the road network, there will be an additional need for schools, surgeries, dentists, NHS support (Weston Hospital is struggling now, what will it be like in five/ten years time).</p> <p>Of course Bristol cannot accommodate the total need but it is more practical and more cost effective to build out from a hub with the road networks and infrastructure being considered more rationally.</p> <p>I look forward to your reply.</p> <p>Regards,</p> <p>Vic Slater</p>	
Persimmon Homes Severn Valley	14590529//1	<p>North Somerset Sites and Policies Part 2 Site Allocations Plan Main Modifications Consultation - Response of Persimmon Homes Severn Valley</p> <p>1. <u>Introduction</u></p> <p>1.1 This is a response by PHSV to the current consultation on the Main Modifications of the Sites and Policies Plan Part 2: Site Allocations Plan (SAP arising from the Inspector's letter (ID4) of the 26th June 2017, following hearings into the SAP.</p> <p>1. <u>Response to Modification MM1</u></p>	

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		<p>2.1 Persimmon Homes Severn Valley (PHSV) support the joint statement submitted on behalf of a number of developers. From that we emphasise the following general principles, and add some additional comments:</p> <ol style="list-style-type: none"> 1. The Inspector concluded after the hearings that <i>‘I therefore look to the Council to test the allocation of additional sites within the SAP which would have the capacity to accommodate up to 2,500 dwellings and which have a realistic chance of being delivered by the end of the SAP period in 2026.’</i> <ol style="list-style-type: none"> 1. The Inspector also provided clear advice that housing land supply should be assessed on the basis of the Sedgefield approach, with a 20% non implementation allowance. 2. The Council’s role at this stage is to test the requirement for an additional 2,500 dwellings to provide certainty and build in flexibility. 3. Critically, the Inspector found ‘there are sound reasons for considering that there are a number of sites within the SAP which are unlikely to come forward in the timescale envisaged by the Council, either within the first five years after adoption of the SAP, or in the remaining period of the CS to 2026 (ID4 paragraph 30). 4. It is not appropriate to revisit the calculation of the additional housing requirement. The Council sought to consider four options for assessing the additional requirement, contrary to this principle and our view is that only option (b) of applying a 20% discount to the residual number of dwellings to be built over the remainder of the plan period, 2017-2026 (12,138 dwellings) accords with the Inspector’s conclusions. 5. We do not consider the Council has addressed site/units unlikely to come forward within the existing SAP allocations. 	

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		<ol style="list-style-type: none"> 6. Consistency with the Core Strategy (CS) is only a starting point (ID4 paragraph 23) 7. Omission sites that are in accordance with the CS but not in the development pipeline have not been assessed and neither have all other potential sites in the development pipeline been assessed. 8. Interpretation of whether or not sites are broadly in conformity with the CS is not transparent or robust. 9. The Council have not carried out the necessary balancing exercise to assess potential for delivery against policy. 10. The Inspector recommended a collaborative approach, but in their consultation the Council did not encourage suggestions for new sites or properly assess those that were submitted anyway (for example the PHSV site at Farleigh Fields, Backwell as set out below). 11. We consider there are 1,268 units on non Green Belt sites and 1,812 units which the Council identified in CD2a Part 2 which total 3,080, which if discounted by 20% would give a total of 2,464. 12. The selection of sites is not transparent or robust and there are inconsistencies between CD2a and ED36. 13. The 20% discount should apply to all units not completed and should not be discounted further. 14. The provenance for the 20% is robust and supported by evidence. 15. Any new allocations that do not come forward in the short term will contribute towards meeting JSP requirements. 16. There is a need to identify a wider range of sites including doing more to deliver existing allocations, for example PHSV sites at Moor Road, Yatton, West of Winterstoke Road, Weston-super-Mare and Winterstoke Village Phase 2. 17. In conclusion we do not consider the Council have fully tested the total capacity to demonstrate how 2,500 dwellings could be 	

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		<p>accommodated and then to consider the implications of doing so to provide a full justification for ruling out certain sites and arrive at a total acceptable to the Council, for final consideration by the Inspector. Therefore as this has not been done we have no alternative other than to invite the Inspector to hold further Hearing Sessions to properly consider all the issues raised in this response.</p> <p><u>Comments on Sites</u></p> <p>2.2 PHSV consider there are 2 major flaws in the Council's site assessments. Firstly a number of sites in the CD2a Part 2 list are more constrained and less likely to come forward than other sites in the development pipeline and omission sites. Secondly, that is made worse by the very limited list of sites the Council has tested despite, identifying others in Part 1 of the schedule having potential, which have not been assessed</p> <p><u>Farleigh Fields Backwell</u></p> <p>2.3 Our first concern relates to the treatment of Farleigh Fields, Backwell. Whilst the site (together with others) is at appeal and awaiting a decision, that does not mean the site could not be assessed and allocated in the SAP. Therefore, firstly we have compared the treatment of Farleigh Fields against the approach in the SAP to other sites. In particular land at Cox's Green, Wrington is included as a site at appeal in CD2a Part 1, but a smaller site is also included in Part 2. and assessed for lower numbers.</p> <p>2.4 Farleigh Fields is owned by PHSV, all the recognised constraints have been resolved through the planning application and appeal process (including a Section 106 Agreement) so a Reserved Matters application for a first phase could be submitted</p>	

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		<p>quickly. In comparison there are other sites assessed by the Council with far less certainty of delivery, given the need to demonstrate delivery is a key requirement throughout the Inspector's letter.</p> <p>2.5 There were 7 sites which were assessed with no delivery profile, either because there had been no response form landowners or agents or because the response cannot confirm delivery. These are Dauncey's Hotel (10 units), Queensway/Midhaven Rise (35), Waverley House (21), Lower Bristol Road 916), South of Cadbury Garden Centre (21), Sweeting and Son, Sandford (16) and Winford Garden Centre (11). Whilst these only total 130 units, significantly they are on smaller site where delivery should be more certain and they are important for the supply of sites for smaller builders.</p> <p>2.6 There are 2 issues regarding the interpretation of '<i>broadly consistent</i>' with the CS. There are 5 sites which involve the loss of employment land, including land currently in active employment use. These are Harbour Road/Gordano Gate, Portishead (93), Harbour Road/Serbert Road, Portishead (93), 173 Kenn Road, Clevedon (60), Old Mill Road, Portishead (350) and Wyndham Way, Portishead (35). These generally are larger sites and total 631 units but their development for residential or substantially residential use conflicts with CS policies CS20 and CS31 and the submitted SAP employment policies. In other words these sites are considered acceptable, even though on any reasonable interpretation, they are not '<i>broadly consistent</i>' with the CS. Therefore this interpretation could and should be applied to other sites.</p> <p>2.7 There are then a series of sites, which whilst they exceed the indicative CS scale for development outside settlement boundaries, having been included are clearly considered by the Council to be '<i>broadly consistent</i>' with the CS. However Youngwood Lane, Nailsea which proposes 450 dwellings was originally assessed in its entirety. That is 9 times the policy limit. In comparison, 220 dwellings at Farleigh Fields would be a similar 8.8 times the CS32 figure of 25 dwellings. The final list of sites includes part of</p>	

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		<p>the whole Youngwood Lane site. That the principle needs to be applied more widely to release more sites like Farleigh Fields, where as recognised by the Inspector (ID4 paragraph 19) and like Youngwood Lane, the scale of schemes is restricted and without the benefit of a positive allocation in the SAP the negotiation of planning permission could delay delivery.</p> <p>2.8 The Inspector commented that the Council’s assumed rate of delivery in their housing trajectory is optimistic so that their 5 year supply is unlikely to be delivered (ID4 paragraph 13). It is important that the Council avoid making the same mistake in considering the additional sites. However, the delivery information provided by the developers seems to have been accepted without question and we consider this results in unrealistic assumptions on a number of sites, in particular an excessive number of units in the first year of production and an excessive delivery per annum on flatted developments.</p> <p>2.9 We also note that the Part 2 list includes sites with C2 units and Park Homes, which have not previously been include in the Councils’ 5 year housing land supply and therefore should be discounted.</p> <p>Details of Farleigh Fields</p> <p>2.10 In addition to the issues set out above and the need to apply general principles consistently, there are a number of reasons why it is appropriate to allocate Farleigh Fields in the SAP, as follows:</p> <ul style="list-style-type: none"> - The principle of residential development at Backwell accords with the Spatial Strategy of the Development Plan 	

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		<ul style="list-style-type: none"> - Policy CS32 supports additional housing at the Service Villages which enhances the sustainability of the settlement. - Backwell is identified as a Service Village and the Council accept that it is a suitable and sustainable location for residential development. - The Backwell Neighbourhood Plan does not allocate any housing sites at Backwell but does support housing development that would be of a scale which is appropriate to the size and character of the settlement. - The NP does not restrict housing to allocated sites or to sites within the settlement boundary. - The emerging JSP indicates the need for additional housing at North Somerset and identifies Backwell/Nailsea as a potential location for a further 3,600 dwellings. - Additional housing at Backwell would accord with the adopted and emerging spatial strategy for the area. - The LPA identifies Backwell as the most sustainable Service Village beyond the main towns in North Somerset. - Residents have a choice of sustainable transport modes including walking and cycling and public transport (with access to a mainline Railway Station and frequent bus services. - By allocating only 3% of the Service Village housing requirement to Backwell the emerging Site Allocations Plan fails to take the opportunity to focus more development at the most sustainable Service Village. - The scale of development is appropriate at 	

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		<p>Backwell.- 220 homes at Backwell only equates to 10.4% of the overall Policy CS14 dwelling requirement for Service Villages (2,100) and 11.6% growth in the village. It has no material implications for the Spatial Strategy, is not disproportionate and would still represent lower levels of growth than planned at other less sustainable villages.</p> <ul style="list-style-type: none"> - In accordance with the Council’s assessment of other sites, allocation would not be inappropriate because the site lies outside the settlement boundary as Policies CS14 and CS32 require such sites to be brought forward as Site Allocations. - The unique nature of the site, surrounded by development on all sides such that it is essentially infill development rather than a new incursion into open countryside. - It is essential that suitable unallocated sites outside settlement boundaries be allowed to come forward immediately and without further delay. <p>2.11 In addition the Council have previously considered the allocation of Farleigh Fields. The North Somerset Executive considered the submission draft of the SAP on 2nd February 2016, when the original Committee documents did not propose to allocate Farleigh Fields, confirmed its existing status as outside the development boundary, but identified Local Green Space on the same area originally proposed as such in the neighbourhood plan. This effectively left 2 areas of ‘white land’. However, the Executive Committee deleted a proposed site at Oldmixon and replaced it with Farleigh Fields, with the Local Green Space retained, effectively as in the planning application.</p> <p>2.12 The Executive Committee decision was called in by the SPED Scrutiny Panel who on the 23rd February referred the decision back to the Executive, who on 24th February resolved that <i>‘The Consultation draft Sites and Policies Plan Part II: Site Allocations be approved for public consultation but with the exclusion of both the land</i></p>	

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		<p data-bbox="535 328 1563 392"><i>north of Oldmixon Road, Weston-super-Mare (Hutton Parish) and the land at Farleigh Fields, Backwell from the list of sites allocated for new housing.'</i></p> <p data-bbox="535 432 1554 496">2.13 We note a planning application on the Oldmixon site was subsequently allowed on appeal for 150 dwellings.</p> <p data-bbox="535 536 1574 703">2.14 Farleigh Fields is a deliverable site in the development pipeline. As such we completed a delivery profile form when the Council consulted with landowners of sites they have assessed. This was an attempt to work with the Council as the Inspector urged in ID4 paragraph 25. It is therefore disappointing that there has been no response from the Council</p> <ul data-bbox="613 743 1541 807" style="list-style-type: none"> • PHSV also control 3 allocated sites where delivery has been delayed and we comment on those as follows. <p data-bbox="535 847 976 879"><u>AM27 - Phase 2 Winterstoke Village</u></p> <p data-bbox="535 983 1574 1302">2.16 Planning application 12/P/1510/OT2 for the second phase of Winterstoke Village was registered on 13th September 2012 and remains undetermined for a number of reasons. PHSV has been working with the Council through a series of regular meetings to resolve all the issues. However as all of Phase 1 is either built or consented, the resolution of this application is now a matter urgency if continuity of delivery is to be maintained. One issue still to be resolved relates to the calculation of jobs to meet CS policies requiring a job-led approach. The issues raised by the Inspector in ID4 paragraph 15 are very real and if not resolved on this application could act as a further constraint on delivery both here and more widely at Weston Villages. As with the</p>	

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		<p>replacement playing field issues it is likely that the Council will need to make a judgement.</p> <p><u>AM31 - Land to the West of Winterstoke Road, Weston-super-Mare</u></p> <p>2.17 Similarly to Moor Lane there is a playing field issue related to this site and Schedule 1 of the SAP says <i>'loss of sports pitch needs to be address.'</i> Again a solution is available as the use of the former poor quality grass pitch with no changing facilities is being transferred to a new 3G pitch at the adjoining Weston-super-Mare FC stadium, in addition to the main stadium grass pitch. Despite protracted discussions, Sport England have made it clear they will continue to object in principle to the loss of a grass pitch. When the planning application is submitted the Council will again need to make a similar judgement to that required at Moor Road (see below) when considering the planning balance.</p> <p><u>AM81 - Moor Road, Yatton</u></p> <p>2.18 Schedule 1 of the SAP identifies a number of constraints on this site relating to heritage, ecology, surface water drainage and highways, which have all been resolved in the course of progressing the submitted planning application, 16/P/0888/F. The one remaining constraint is the replacement/relocation of rugby playing pitches, which is subject to a Sport England objection. In determining the application the Council will need to take a view on this in the light of a replacement provided by the rugby club themselves and the need to consider the SE objection against the urgent need to boost the supply of housing in assessing the planning balance. The application is a full application which would allow early delivery, which is a key consideration as only 6 of the Part 2 sites are full applications, together with 1 full matters application, but a</p>	

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		<p>further 13 sites are only at pre-application or EIA stage and unlikely to deliver units for some time.</p> <p style="text-align: center;"><u>Conclusion on Sites</u></p> <p>2.19 The Council’s approach does not demonstrate a commitment to boost significantly the supply of housing in accordance with the Inspector’s determination of the need for a 20% buffer. The buffer of supply will help to ensure there is a realistic prospect of achieving the planned levels of housing development by offering flexibility of supply, helping to ensure there is choice and competition in the market for land and deliver the national policy requirement to boost significantly the supply of housing. The buffer also helps to address the concerns of the Inspector that some sites may not come forward as anticipated in whole or in part in the light of the Council’s optimistic assumptions in the trajectory and the time it takes to deal with planning applications, together with any other unpredictable events.</p> <p style="text-align: center;">1. <u>MM2 Employment Policies</u></p> <p>3.1 Planning for sustainable economic and employment growth in North Somerset is a key requirement which we fully support. However, we were previously critical of the submitted employment policies and following the Hearings we have met with the Council to attempt to agree a wording for a simplified approach by way of a single policy. Considerable progress was made resulting in modification MM2. We have not sought to progress a Joint Statement (as for the residential policies) because those who appeared at the previous Hearings represent only a small number of employment interests. What we now have is a policy approach which is a considerable improvement on the submitted policies, but which may not entirely satisfy all individual interests. If,</p>	

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		<p>when responses to the proposed modifications have been submitted, there may be an opportunity to consider either an agreement wording by the developers and/or a common agreed approach with the Council.</p> <p>3.2 We accept that the Council have appointed Atkins to advance a comprehensive employment land review which will include planning policy recommendations to be taken forward in the new North Somerset Local Plan. Therefore whilst the policy adopted in the SAP is likely to have a short shelf life, it is important that it is realistic and does not result in unintended consequences, in the context of the emerging West of England Joint Spatial Plan and the emerging new Local Plan.</p> <p><u>PHSV Comments on the Modified Policy SA4</u></p> <p>3.3 We support the single policy approach, which provides a consistent set of criteria for all employment sites which the submitted policy has failed to do.</p> <p>3.4 We consider there is an issue about how criteria (i) to (iv) relate to each other. As drafted each has ‘and’ at the end of the clause, so that all criteria apply in all cases. We do not think that approach is right. Firstly, the construction of the modified policy SA4 is largely derived from the former replacement Local Plan (2007) Policy E/5:</p> <p>Safeguarded Employment Areas – Within existing B1-B8 business employment areas, as well as land identified on the Proposals Map for business employment development, proposals for unrelated non B1-B8 development will be permitted where it can be demonstrated that:</p> <ol style="list-style-type: none"> 1. the proposal would not harm the range or quality of land and premises available for business use development within existing employment areas or 	

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		<p>expressly identified in the Local Plan to meet economic development or local business employment needs and the number of job opportunities provided; or</p> <p>2. there is a specific requirement associated with neighbouring business uses. Any retail or other town centre uses would also be assessed against the recognised sequential tests; or</p> <ul style="list-style-type: none"> the site is no longer capable of offering accommodation for business use development, or that the proposals would lead to the removal of incompatible development, resulting in greater potential benefits to the community in terms of environmental benefits, significant improvements in the amenities of existing neighbouring residents or contribute to a more sustainable pattern of development that would outweigh the loss of employment capacity in the locality. <p>This contains three criteria and although the precise wording is different, the effect is the same as in the modified policy. The three criteria are linked by the word ‘<i>or</i>’ so would only be applied to specific sites where applicable. The Council have not identified any reasons or change in circumstances for adopting a fundamentally different approach prior to the Atkins review.</p> <p>3.5 Secondly, the effect of the wording could be to require a marketing exercise and report in all cases. This is unnecessary because if the alternative proposal would not create ‘<i>harm</i>’ in considering criterion (i) or there is a specific requirement associated with neighbouring business uses which would the suitability test in criterion (ii), permission should be granted without the need for marketing. Therefore we consider the first three criteria should be linked by the word ‘<i>or</i>’.</p> <p>3.6 We consider criterion (iv) is too wide. It is a catch all policy which could be applied in all cases, but which requires a subjective judgement on whether or there</p>	

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		<p>would be an impact on the ability to achieve wider (undefined) economic aspirations, which relate to regeneration, business growth and improved commuting patterns. Again, as the requirement would apply to all cases, even if the specific requirements in criteria (i) to (iii) are satisfied it could lead to a refusal. We consider the wording builds in a policy conflict between the requirements of criterion (iii) and (iv). Therefore even if criteria (iii) is met, on the basis that the proposal was judged to result in removal of incompatible development resulting in community and environmental benefits, and (rather than or) it contributed to a more sustainable pattern of development, those benefits could be discarded because the proposal would also need to achieve wider economic aspirations.</p> <p>3.7 Modified paragraph 4.34 says the overall policy approach ‘<i>reflects the earlier tried and tested policy approach established in the North Somerset Replacement Plan.</i>’ However as set out above Policy E/5 did not include any reference to wider economic aspirations. Therefore as this results in a fundamental departure from the tried and tested approach, criterion (iv) should be deleted and the concept of wider economic aspirations properly considered and examined through the Employment Land Review and the emerging new Local Plan, or at the very least it should added to criterion (iii) with the deletion of ‘and’ at the end of criterion (iii) and substitution of ‘or’.</p> <p>3.8 Criterion (iii) requires the ‘<i>demonstration of effective marketing.</i>’ We consider that it would be helpful to provide guidance in the supporting text on how the Council would judge whether marketing is ‘effective’ to avoid applications being rejected on the basis that it was not.</p> <p>1. <u>MM3 Undesignated Green Space</u></p>	

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		<p>4.1 PHSV considered the submitted policy was unsound and should be deleted.</p> <p>4.2 The proposed modifications make substantial changes to the wording of the policy but we consider these only demonstrate the policy is unnecessary.</p> <p>4.3 The changes to paragraph 4.44 relates the policy approach to NPPF paragraph 14. This requires local planning authorities to <i>‘set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure . . .’</i> The emphasis here is on a strategic approach not a policy to protect individual areas of undesignated Green Space within settlements. The strategic approach to green infrastructure in North Somerset is set out in adopted Core Strategy policy CS9. This says <i>‘the existing network of green infrastructure will be <u>safeguarded</u>, improved and enhanced by further provision . . .’</i> (our emphasis).</p> <p>4.4 Therefore our view is that the Core Strategy Policy already provides for protection (and in addition improvement and enhancement) which renders the SAP Policy SA6 as modified superfluous. In addition, specific areas of Green Space are protected by Policies CS27, DM68, SA5 (Local Green Space) and SA7 (Strategic Gaps) and by NPPF paragraph 74, which says existing open space should not be built on and this includes all open space of public value.</p> <p>1. <u>General Comments on Modifications</u></p> <p>5.1 There are a number of modifications which are unclear and inconsistent and we consider further modifications are required to resolve the following issues and conflicts.</p>	

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		<p data-bbox="613 328 741 355"><u>Schedule 1</u></p> <p data-bbox="539 397 1476 424">5.2 In Schedule 1 there are no formal modifications to the following changes:</p> <ul data-bbox="613 466 1563 1094" style="list-style-type: none"> <li data-bbox="613 466 1115 493">• The dates in the headings to Schedule 1. <li data-bbox="613 499 1205 526">• The change in the total for Weston-super-Mare. <li data-bbox="613 533 1223 560">• The change in numbers for Clevedon Hall Estate. <li data-bbox="613 566 1039 593">• The change in total for Clevedon. <li data-bbox="613 600 1227 627">• The change in total for land at West End, Nailsea. <li data-bbox="613 633 1016 660">• The change in total for Nailsea. <li data-bbox="613 667 1048 694">• The change in total for Portishead. <li data-bbox="613 700 1563 727">• The change in the planning application number at The Chestnuts, Winscombe. <li data-bbox="613 734 1429 807">• The change in the planning application number and description for Woodborough Farm, Winscombe. <li data-bbox="613 813 1267 841">• The change in total at Arnolds Way, Phase 1, Yatton. <li data-bbox="613 847 1563 920">• The change to the planning application number and description at Pudding Pie Lane (not Land) (West), Churchill. <li data-bbox="613 927 1245 954">• The deletion at Pudding Pie Lane (East), Churchill. <li data-bbox="613 960 1151 987">• The change in the total for service villages. <li data-bbox="613 994 1151 1021">• The change in the total at Berrow Hospital. <li data-bbox="613 1027 1196 1054">• The total for other settlements and countryside. <li data-bbox="613 1061 994 1088">• The change to the grand total. <p data-bbox="539 1134 674 1161"><u>Schedule 2</u></p> <p data-bbox="539 1203 1104 1230">5.3 The following issues relate to Schedule 2:</p> <ul data-bbox="613 1272 1563 1335" style="list-style-type: none"> <li data-bbox="613 1272 1563 1335">• Weston Gateway south of the A370 is deleted through a Main Modification whereas all the residential Site Allocations Schedule 1 (AM25, AM26, AM27, 	

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		<p>AM45, AM46) are dealt with as Additional Modifications. We consider there should have been a consistent approach and in our view deletions constitute Main Modifications.</p> <ul style="list-style-type: none"> • There is no modification for the change in total for Weston-super-Mare. • The inconsistent approach to modifications is demonstrated by the change in the total employment allocation which is identified as an Additional Modification unlike the treatment for the total for residential sites the individual figures in Schedules 1 and 2. <p><u>Schedule 3</u></p> <p>5.4 The deletion at Brookfield Walk is again a Main Modification unlike the residential site applications.</p> <p>-</p> <p><u>Schedule 4</u></p> <p>-</p> <p>5.5 We note all deletions are again by Additional Modifications rather than Main Modifications.</p> <p><u>Policy Map Changes</u></p> <p>5.6 There is no consistency in the way policy map changes are deleted either as Additional Modifications or Main Modifications.</p>	

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		<p>5.7 In conclusion this results in a confusing and inconsistent approach and a number of further modifications are required to ensure the plan is sound.</p> <p>Paul Davis</p> <p>Strategic Land Director</p> <p>Persimmon Homes Severn Valley</p> <p>paul.davis@persimmonhomes.com</p> <p>30th October 2017</p>	
Oliver Matthews	14824321//1	<p>North Somerset DC Site Allocations Plan Unsoundness (Oct 2017 Consultation) – Rectory Farm, Yatton unlawful emittance of evidence</p> <p>I write in two separate parts in respect of the North Somerset District Council Site Allocations Plan (SAP) on which you are currently consulting. This first submission is specifically made in respect of what Rectory Farm consider to be the unlawful emittance and oversight of evidence which has been provided to date in support of development of Rectory Farm, Yatton to the SAP evidence base.</p> <p>This submission should be read alongside and not independently of our second submission of the same date (27th October 2017) which makes detailed representations on the methodology and other evidence presented in respect of the emerging SAP.</p>	

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		<p>I wish to highlight Rectory Farm, Yatton’s grave concerns in respect of the incomplete and unsound evidence base on which North Somerset DC are proposing to continue to update and modify their proposed site allocations plan.</p> <p>Rectory Farm Yatton has consistently made representations to NSDC identifying land both north and south of Biddle Street, Yatton for development. Whilst the land comprising circa 25 acres to the north has been assessed (ref HE14350) land south of Biddle Street comprising 7 acres has not (either for or against, it has totally been omitted from any assessment). The 7 acres has capacity for circa 100 – 110 dwellings. We have consistently asked NSDC to rectify its oversight through representations and to fairly assess the 7 acre site on its own merits. To it has made no efforts to do this and the site has once again been omitted from the evidence base within the “new sites to be assessed” (ref CD2A attached to NSDC interim response dated 20th July 2017).</p> <p>I have identified below a chronology of the representations and correspondence with NSDC alerting them to this issue to date:</p> <ul style="list-style-type: none"> • 27th April 2016. North Somerset Allocations DPD. Representations submitted by Rectory Farm including land north and south of Biddle Street, Yatton. Plan attached including land to south that has not been assessed. • 8th September 2016. Policy Representations. Submitted by Rectory Farm in respect of land north and south of Biddle Street, Yatton. Plan attached including land to the south that has not been assessed. • 16th February 2017. Representations to call for sites. Submitted by Rectory Farm on land to the south of Biddle Street, Yatton. Plan attached including the land to the south that has not been assessed. • 23rd February 2017. Email from Rectory Farm to Graham Quick, NSDC with site plan including land to south of Biddle Street calling for the sites consideration as an allocation. 	

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		<ul style="list-style-type: none"> • 19th June 2017. Email to Graham Quick NSDC. Submission of site layout and opportunities and constraints analysis again requesting its inclusion within SAP. • 19th June 2017. Out of office response from Graham Quick, NSDC to Rectory Farm. On annual leave until 26th June 2017. • 26th June 2017 response from Graham Quick NSDC to Rectory Farm, confirming land south of Biddle Street <u>had been assessed</u> as part of the evidence base. <ul style="list-style-type: none"> ◦ 19th June 2017. Out of office response from Graham Quick, NSDC to Rectory Farm. On annual leave until 26th June 2017. ◦ 26th June 2017 response from Graham Quick NSDC to Rectory Farm, confirming land south of Biddle Street <u>had been assessed</u> as part of the evidence base. ◦ 26th June 2017 email to Graham Quick NSDC from Rectory Farm re-confirming that land had <u>not been assessed</u> despite consistent and renewed representations for it to be. Attached resubmitted representations demonstrating this fact. ◦ 26th June 2017. Graham Quick NSDC accepted a meeting request to discuss the development potential of the site. ◦ 26th June 2017. Rectory Farm accepted the earliest meeting date available for 14th July 2017. ◦ 14th July 2017. Meeting held with Graham Quick NSDC. Layout, opportunities and constraints, housing trajectory discussed. Housing trajectory and layout left with Graham Quick. Chronology of representations and SAP evidence base discussed and the omission of the 7 acres to the South within it emphasised and acknowledged by NSDC. Pre-application process discussed and submission welcomed. ◦ 17th July 2017 pre application submission formally made to NSDC by Rectory Farm following recommendation by Graham Quick. 	

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		<ul style="list-style-type: none"> ◦ 24th July 2017 confirmation of an appointed officer Graham Quick NSDC to the application. ◦ 24th July 2017 NSDC email forwarding link to interim letter to Inspector and schedule of new sites to be considered. Omission of Rectory Farm from this schedule. <p>We can once again make any of the above correspondence available to you at your request.</p> <p>The time table attached to NSDC's interim statement para 6 page 2 should have provided sufficient time for Rectory Farm to have submitted any necessary information and to be considered within this revised assessment process thereby rectifying the historic oversight. NSDC has made no attempt to contact Rectory Farm nor raised this matter in person at the meeting on 14th July 2017. I can only conclude that this was purposeful.</p> <p>The submission by Rectory Farm on 19th June 2017 included a detailed layout and promotional document demonstrating its feasibility. This can be provided on request. It is a highly sustainable location, outside any environmental restriction such as flooding, sssi or green belt and meets the three tests as set in the Inspectors Examination Response (ID4 dated 14th July 2017) in para 24.</p> <p>Rectory Farm also left with Mr Quick a housing trajectory on 14th July as well as further architectural layout work. On 17th July a detailed land viability assessment and further accompanying material including SSSI, drainage maps, agricultural land classification map and other supporting material was submitted to Graham Quick NSDC.</p>	

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		<p>It is now clear from NSDC interim response that it wishes to exclude what is in our view an available, sustainable and deliverable sites from any consideration whatsoever from its evidence based on an arbitrary date set by them of 26th June 2017. Clearly Rectory Farm has made very meaningful and purposeful attempts to engage NSDC well in advance of this date (I stress that it is Rectory Farm's view that this date has absolutely no meaning or relevance) and yet remain totally overlooked. This in our view must be unsound and should be remedied immediately by NSDC.</p> <p>Rectory Farm considers it has been unfairly and unlawfully omitted from due consideration in this allocations process. I ask that NSDC take the necessary steps to ensure that this matter is now rectified in advance of submitting the next modifications of the SAP to the Inspector for consideration.</p> <p>I very much look forward to considering your response and modifications proposed to remedy this matter in due course.</p>	
Oliver Matthews	14824321//2	<p>OBJECTION Rectory Farm, Site allocations plan consultation, October 2017.</p> <p>This letter forms the second of two representations submitted by Rectory Farm Yatton in respect of the consultation of NSDC SAP (both dated 27th October 2017). This submission specifically relates to the latest evidence base, NSDC position statement, new site assessments, questionnaires and Inspectors Responses (ID4, ID5, CD2 CDa CD2b, CD2c, CD2d, CD3) and the now consulted on Draft Allocations Plan Modifications (Oct 17).</p>	

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		<p>Rectory Farm OBJECTS in the strongest possible terms to the content of NSDC’s interim response (CD2) to the Site Allocations Plan (SAP) and updated evidence, assessment and methodology as proposed.</p> <p>Each matter has equal weight and material importance and are presented below in no set order.</p> <p>Inspectors Response (Ref ID4) and NSDC Interim Response (Ref CD2) and SAP Modifications</p> <p>1.The Inspectors letter (ID4) to NSDC dated 26th June 2017 identifies very clearly in paragraphs 7 - 26 the methodology applied in requiring an additional 2,500 dwellings to be tested.</p> <p>The concluding instructions in paragraphs 27 – 28 require NSDC to test and propose modifications which will include the assessment and meeting of the additional shortfall in housing numbers (2,500 dwellings).</p> <p>The Inspector is absolute and matter of fact in their requirement of this test, it is not a target.</p> <p>This is necessary to achieving a flexible supply to achieve the delivery of 20,985 over the plan period.</p> <p>Rectory Farm objects wholeheartedly to the content of NSDC interim response dated 20th July (CD2) in which it attempts to water down and renegotiate the findings and concluding instructions of the examination. Such a position holds the Inspectors judgement in contempt and seeks to overturn principles that have already been established in a forum that does not exist.</p>	

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		<p>The Inspectors response is clear that the Core Strategy Spatial Strategy and existing evidence base is the starting point. It does not preclude any new sites that can demonstrate their sustainability and deliverability credentials from also being considered in making up this 2,500 assessment and deficit.</p> <p>Rectory Farm does not consider that NSDC has tested all potential sites in the development pipeline. NSDC has taken a blinkered and unsustainable approach to this exercise omitting any new sites from being considered beyond 26th June 2017. It stands to reason that new sites being brought forward by land owners / developers until the Inspectors Response (ID4 dated 26th June 2017) would have assumed NSDC had already presented a sound evidence base and that they would stand no reasonable prospect of being considered favourably within the SAP and consequently had not made themselves available sooner. In the context of the Inspectors Report (ID4) it appears wholly relevant and necessary to now update, include and assess the sustainability and development credentials of all new sites that have subsequently made themselves available as part of this new wider allocations assessment process.</p> <p>There is nothing that prevents these new sites being more sustainable in fact than those existing sites already identified. Until they are equally and fairly assessed this cannot be robustly assessed and considered.</p> <p>2.Rectory Farm objects to any reduction from the 20% buffer in housing need. As you will already be familiar there is extensive policy and case law on this matter which consistently puts onus on under-performing authorities (of which NSDC is already established as being) to provide a 20% buffer. There is no flexibility for a negotiation on this matter and again the position has been clearly set out by the Inspector (ID4). I wish to highlight other Local Plan's including North Devon on which the same Inspector has also have recently determined with a similar buffer. Consistency must be applied in this instance. Para 9 of ID4 provides further clarity on this point.</p>	

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		<p>3. NSDC has failed in its attempt to assess an additional 2,500 dwellings as instructed in ID4. Part 2 of the table submitted on 20th July 2017 as part of the interim statement identifies the sites that will be assessed (CD2a). The total yield on this table is 1,812. This is still some 688 short of the Inspectors instruction in assessing 2,500 dwellings. This again demonstrates the pre-determination of NSDC in its method and failure to comply with the most basic and fundamental of the Inspectors instructions.</p> <p>To meet the assessment of 2,500 dwellings NSDC must update its assessment to include other sites not previously considered within the evidence base that have presented themselves as development opportunities. Rectory Farm, Yatton being one of a number than fit this criteria.</p> <p>4. NSDC has failed to include within its evidence base sustainable housing sites that have consistently been put forward for development. I have written representations dated 16th August 2017 separately to NSDC in respect of Rectory Farm, Yatton which has been submitted numerous times over the last 18 months and at each and every stage NSDC has failed to include or recognise the site in any way. It has not been tested either for or against development whilst providing an opportunity for circa 100 – 110 dwellings outside of flood zone, sssi, greenbelt or any other environmental designation. The site abuts the development boundary and accessed from a substantial adopted highway. The Plan’s evidence base must be considered unsound on the basis of its consistent omission from the evidence base. The site is highly sustainable, deliverable and achievable and meets all three of the tests as set out within the Inspectors letter dated 26th June (ID4).</p> <p>Rectory Farm Objects in the strongest possible terms to Rectory Farm’s continued emittance from consideration or assessment within the SAP evidence base. On this basis the Plan is considered unsound.</p>	

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		<p>5. NSDC has sought to omit any new sites either as applications or pre-application beyond the 26th June 2017 (CD2). This is a self appointed deadline and is only a reflection of NSDC not wishing to fairly assess new information which has been submitted on sites which are immediately deliverable and wish to be fairly assessed. This approach is objected on the strongest possible terms. You cannot expect developers and land owners to have sought to engage an application or pre-app at very significant cost and risk at a period before your response dated 26th June. At this point in time NSDC's response would have been on the basis that they believed they had a sound allocations plan and consequently would have been negative and disengaged. It is only in the context of The Inspectors decision (ID4) dated 26th June that circumstances have provided opportunity for new sites to present themselves so as to be assessed fairly as part of the updated assessment database. These are highly sustainable sites which can immediately assist in meeting the shortfall in housing need and must be included and assessed equally with all other sites. Such a blinkered inflexible approach as proposed by NSDC is objected to.</p> <p>NSDC should be welcoming new sites and opportunities to come forward and present themselves especially given their shortfall in housing numbers of 1,800 when they are required to test 2,500. This further reaffirms NSDC failure to take this matter serious and robustly evidence its decision making.</p> <p>6. Of the sites identified in Part 2 of the new sites to be assessed (CD2a) it is evident that no sites whatsoever are in Yatton. Yatton is a higher order service village (as recognised within the adopted Core Strategy) with services and infrastructure that warrant considerably more growth and development than some of its comparative neighbours. It has a main line railway station, schools, library, shops, supermarket, bank, library and pharmacy. It is therefore notable that Rectory Farm Yatton is still absent from any assessment when the settlement itself clearly can support additional growth. This remains a significant oversight on which I have written to your separately.</p>	

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		<p>Rectory Farm Yatton has recently attended Parish Council meetings (31st July) and is now engaged in the Neighbourhood Plan Process. On both accounts the development proposals emerging in this location have been positively received. It is therefore galling that NSDC has not been open to considering such a sustainable site from being fairly assessed as part of this process. This frustration and objection is further compounded by NSDC failure to even meet the required assessment of 2,500 dwellings when there are known available sites which can assist in meeting this total assessment target.</p> <p>Further, despite having formally submitted a pre-app application on 19th July 2017 (and paying a substantial fee) no response, advise or timetable whatsoever has been provided by NSDC in response (as at 16th August 2017).</p> <p>7. Of the new sites assessed in Part 2 of the table submitted by NSDC (CD2 & CD2a) it is notable that there are two very large sites of 450 houses in Nailsea and 350 in Portishead. Whilst I comment in part on their sustainability and appropriateness further down this submission NSDC's interim response puts the onus on delivery of sites within the first 5 years. It is very clear that both of these sites whilst potentially contributing to a 5 year supply they will not be completed within the 5 year period. I have seen no evidence that any site of this size has been developed from pre-app or even application stage with such high delivery rates; this will only further compound the lack of delivery further downwards in the first five years. Again, sites such as Rectory Farm Yatton comprising circa 100 dwellings should therefore be at the forefront of the assessment of new sites and considered favourably well in advance of these more substantial developments that cannot be delivered within the 5 years.</p> <p>This matter is further considered on a site by site basis later in this submission.</p> <p>8. Paragraph 6 of NSDC interim response (CD2) provides a time table for site assessment. This table does not work and is incorrect. The dates jump about and is</p>	

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		<p>factually inaccurate. It is objected to in the strongest possible terms. Had sites that are now in pre-app or application stage been provided with a fair and reasonable timetable to provide a response (it is a two page assessment sheet that is proposed!) they could have been immediately returned and considered as part of this evidence base. Again NSDC are attempting to blinker and bluff their way through robustly assessing available, deliverable and sustainable sites which immediately in front of them and should be considered fairly as part of this process.</p> <p>Further in respect of Rectory Farm, Yatton given its consistent representation and submission for the last 18 months NSDC could and should have provided the opportunity within this assessment for the oversight to be corrected. Once again this has failed to be the case. Notwithstanding event that the site is in formal pre-app, a fee of £3,000 paid for this service, highways, drainage, ecological, viability, layout and architectural, housing trajectory all having been submitted in support of this process. Again the actions of NSDC are again objected in the strongest terms.</p> <p>9. Paragraph 15 of NSDC interim response (CD2) is objected to. The figures totally omit and overlook the instruction to assess 2,500 dwellings and even dismisses altogether “Option A” of 2,500 dwellings giving you apparently no choice whatsoever but to accept a watered down methodology. This approach is fundamentally flawed and objected to and appears to pre-determine a softening of the Inspectors instruction.</p> <p>10.NSDC has failed to notify those participating stakeholders within the registered online data base of their interim statement dated 20th July 2017. No email update or online notification has been provided. It appears that NSDC are attempting to quietly bluff its way through this matter without full engagement of all interested parties. I question why such data base and subscription exists if NSDC are not going to use this means to advertise consultation or publication of important new material.</p>	

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		<p>11. Para 12 is CD2 is objected to. Dwellings that are not yet completed cannot be “banked” as certain completions. Any dwelling not already completed may not come forward and cannot be relied upon, hence the need for a buffer.</p> <p>New Site Assessment (NSDC Further assessment of residential sites dated July 2017) / Questionnaire and Housing Trajectory (CD2a, CD2b, CD2c, CD2d) & Proposed Modificaitons (Oct 2017).</p> <p>Rectory Farm Objects in the strongest possible terms to a number of the site specific assessments that have been undertaken by NSDC as part of the Further Assessment of Residential Sites dated July 2017 and sites that have thereon followed into the SAP Modificaitons. In assessment of a number of the new sites critical flaws in the assessment conclusions and sites deliverability are highlighted by Rectory Farm below. The assessments are objected as unsound and unfeasible. The assessments are in part fundamentally flawed, unjustified and unsubstantiated when considering comparable evidence, planning status, environmental policy and policy.</p> <p>Consequently Rectory Farm has grave concerns relating to the deliverability of a number of sites that NSDC has assessed positively for development in response to the Inspectors requirement for the need for 2,500 more houses (ID4).</p> <p>The sites below are identifies in no specific order but are of equal concern and objection:</p> <p>Land North of Youngwood Lane Nailsea OBJECT</p> <ul style="list-style-type: none"> ◦ Housing delivery trajectory of 120 per annum from 2019 onwards is unrealistic. No new site within NSDC housing trajectory for the balance of NSDC Ref ED23 provides such high yields within the 	

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		<p>early years of delivery. Persimmon Homes on its most established site in WSM is projecting 125 dwellings per annum. It is unrealistic to anticipate anything beyond 50 – 75 dwellings per annum from this site which would make it broadly in line with the yields approved from other comparable developments in ED23.</p> <p>Land at Old Mill Road, Portishead OBJECT</p> <ul style="list-style-type: none"> ◦ Commencement in 2019 is unrealistic. This site is a brown field site with no planning and no developer. There are existing leases which restrict the commencement of development until March 2019. ◦ A yield of 150 dwellings per annum is totally unrealistic between 2019 / 2021. Such a yield is not being achieved on any development site within NSDC (even established PLC Greenfield Sites). ◦ A yield of anything more than 25 – 50 dwellings in the first year given the brownfield clearance is considered highly unlikely. ◦ Portishead’s total annual completions in 2016 was 42 dwellings (NSDC AMR 2016). To suggest that this single site can over triple the total annual yield is totally unrealistic and objected to. ◦ The site is only in pre-app discussions. No developer is signed up ◦ Loss of employment and protected business / retail space and jobs. Contrary to Core Strategy policy. ◦ Location is Flood Zone 3. Sequential test should be applied. Harbour Road / Serbert Way, Portishead OBJECT <p>Harbour Road / Serbert Way, Portishead OBJECT</p> <ul style="list-style-type: none"> ◦ B Class employment allocation in SAP. Contrary to Core Strategy to release employment land / job loss (Policy DM60) 	

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		<ul style="list-style-type: none"> ◦ Care Home (use class C2) should not be considered as part of C3 housing delivery ◦ Brownfield development – yield of 50 dwellings in first year unrealistic in trajectory (2018/19). Application only at pre-app stage. 2018/19 delivery totally unrealistic. ◦ Delivery of 50 dwellings in first annum too high based on all other comparative evidence. ◦ All of the site is within Flood Zone 2. Sequential tests therefore apply. 173 Kenn Road Clevedon: OBJECT. <p style="text-align: center;">173 Kenn Road, Clevedon OBJECT</p> <ul style="list-style-type: none"> • The site is safeguarded for business / employment use. Its allocation would therefore be contrary to employment policies as set out within the adopted Core Strategy. • The potential housing yield is identified as 60. The housing trajectory adds up to 75. This is inaccurate. • This is a brownfield site. Delivery from 2019 (assuming allocation adoption by early 2018) appears very optimistic given planning is not in place, site clearance, existing land uses and end user is a elderly care operator (use class C2) which does not fit into the C3 Residential category and therefore should not form part of the residential housing yield. <p>Broadleaze Farm Winscombe OBJECT</p> <ul style="list-style-type: none"> • Fluvial flood risk • Best and most versatile land loss • No house builder in place. 	

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		<ul style="list-style-type: none"> • 80 dwellings in first year (2019/20) with no developer identified or permission in place is unrealistic. 80 dwellings in first year of production is too high given site set up, pre planning conditions and requirements. More realistic delivery 2020/21. <p>Co Housing Project St Andrews Congresbury OBJECT</p> <ul style="list-style-type: none"> • Within conservation area • Extensive tree coverage (TPO by virtue of location within the conservation area) • SAP identifies part of site as local green space (possible Village Green Status) • Access not confirmed <p>Court Farm, Clevedon OBJECT</p> <ul style="list-style-type: none"> • Part of the site is within Greenbelt. National Planning Policy protects all Greenbelt (save for its exceptional circumstances of which this does not meet) • Part of the site is within Flood Zone 3. A sequential test must therefore be applied. <p>Harbour Road Gordano Gate Employment Allocation Horses Head OBJECT</p> <ul style="list-style-type: none"> • Site is within Flood Zone 3 • SAP allocates it for Employment Uses (B use class) under Policy SA4 • All 93 dwellings to be built in 2018. This trajectory is totally unrealistic. In 2016 the total housing yield achieved in Portishead was 42 dwellings (NSDC Annual Monitoring Report 2016). The delivery of 93 dwellings in the first year of development is totally unfounded and has not been achieved on any other sites within NSDC's recent development history. 	


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		<p data-bbox="539 395 1167 424">Overall Housing Trajectory of New Sites Assessed</p> <p data-bbox="539 464 651 493">OBJECT</p> <p data-bbox="539 533 1576 775">Of the deliverability information provided by developers (NSDC table) 106 dwellings were unable to either respond or provide deliverability trajectories. By virtue this must demonstrate their inability to justifiably be allocated or considered for development with any reasonable certainty that they will be developed within a five year period. The only reasonable response by NSDC to overcome this significant additional deficit is by widening the assessment net to include new sites not previously considered but that are now within pre-app or application stage (ie post 26th June 2017).</p> <p data-bbox="539 815 1173 844">Rectory Farm Yatton Deliverability Questionnaire</p> <p data-bbox="539 884 1570 1018">Rectory Farm, whilst not invited to do so, submitted to NSDC the attached (and completed site assessment questionnaire) on 25th July 2017. I would be grateful if Rectory Farm, Yatton can now be accepted and assessed fairly and equally by NSDC in light of the above representations.</p> <p data-bbox="539 1058 1547 1157">Rectory Farm is of the view that the current methodology and evidence base is fundamentally inaccurate, incorrect and unsound and should be immediately modified in response the above matters in advance of the SAPs resubmission to the Inspector.</p> <p data-bbox="539 1197 1485 1260">I would be grateful if you can please acknowledge receipt and acceptance of this representation in writing.</p>	

Respondent Name	Comment ID	Comment	Attached documents
Strongvox Homes Ltd	14838017//1	<p data-bbox="539 328 913 352">BUTTS BATCH, WRINGTON</p> <p data-bbox="539 392 1581 671">At the outset we note that the land at Cox Green, Wrington is being allocated for residential development. We have no comments to make with regards the proposed allocation but clearly the Council accepts that Wrington represents a sustainable location to allocate additional land. This is no doubt due to its identification as a service village under Policy CS32 of the adopted Core Strategy. Such settlements are deemed to be suitable to accommodate additional residential development and the policy states that additional development either within or on the edge of the settlement has the potential to further enhance the settlement's sustainability.</p> <p data-bbox="539 711 1480 775">We believe that land at Butts Batch, Wrington is an eminently suitable site to be allocated for residential development. Our reasons are as follows: -</p> <p data-bbox="539 815 674 839">Landscape</p> <p data-bbox="539 879 1581 1054">The site is not listed within a nationally protected designated landscape designation nor is it within a valued landscape. The site lies within the existing settlement pattern and all borders are defined by established hedges with roads. Its zone of visual influence is highly enclosed and the site has the capacity to assimilate development without any adverse landscape or visual impact.</p> <p data-bbox="539 1094 640 1118">Ecology</p> <p data-bbox="539 1158 1581 1334">In terms of ecology there are no protected species on the site. The loss of the existing grassland as a result of development would not have a significant detrimental impact. Existing hedgerows have potential to provide important habitats and these would be retained and enhanced as part of any development proposals. There is bat activity in the area and the existing hedgerows are used for foraging purposes. These can be retained</p>	

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		<p>and enhanced. In view of the above, the proposed development would not have any detrimental impact on ecological matters.</p> <p>Archaeology & Historic Environment</p> <p>The site is not within a Conservation Area and there are no scheduled monuments, registered or unregistered heritage assets either within or close to the site. The surrounding area has been in agricultural use for many years and the potential for archaeology is low.</p> <p>Flood Risk</p> <p>The site lies within Flood Zone 1 where the principle of residential development is acceptable.</p> <p>Transport & Sustainability</p> <p>The site is eminently suitable in relation to its proximity to shops, facilities and services in Wrington. Indeed if anything it is closer to facilities than the Cox Green site. The proposals have the potential to improve linkages to existing facilities for the site. Access to the site can meet the Highway Authority's required standards. Development would not result in a severe impact on the highway.</p> <p>In view of the above, the site is eminently suitable for residential development and is available and deliverable. It should therefore be allocated.</p>	

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Strongvox Homes Ltd	14838017//2	<p>We write on behalf of Strongvox Homes to provide comments on the North Somerset Site Allocations Plan following the Inspector's note (document ID4) of 26th July; and the council's subsequent publication of site assessments on 1st August 2017.</p> <p>On behalf of Strongvox Homes, we submitted a full planning application (ref: 17/P/0752/F) for 51 homes at Wilson Gardens/Scot Elm Drive earlier this year. Following ongoing and productive discussions with officers, the application is due for determination imminently.</p> <p>The site at Wilson Gardens/Scot Elm Drive is one of the 22 additional sites identified in the Site Allocations Plan to assist North Somerset in meeting its housing requirement. We support the identification of the site as having potential for residential development of 51 homes, in recognition of its suitability for residential development.</p> <p>However, we do have some general reservations about whether the Site Allocations Plan and the additional sites identified are sufficient to meet North Somerset's housing needs, following a long history of under supply, and how the plan will work alongside the West of England Joint Spatial Plan (JSP). We welcome the opportunity presented by the JSP to provide a strategic planning framework to meet the long-term housing and economic growth requirements for the West of England, and respond to the significant under supply of housing across the region and in North Somerset.</p> <p>The preparation of North Somerset's development plan has been a protracted process, as illustrated by the timeline below:</p> <p>2007 - Core Strategy Issues and Options published 2009 - Core Strategy Consultation Draft published 2011 - Core Strategy Submission to the Secretary of State 2012 - Core Strategy Examination</p>	

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		<p>2012 - Original adoption of Core Strategy</p> <p>2012 - Subsequent legal challenge resulting in the adopted plan being remitted for re-examination</p> <p>2014/2015 - Re-examination hearings, and following this, the Inspector's recommendation that the housing requirement be increased from 13,400 to 20,985 homes</p> <p>2015 - North Somerset Council write to the Secretary of State requesting that he intervene and re-consider the Inspector's reasoning and conclusions in reaching his decision</p> <p>2015 - The Secretary of State responds confirming the Inspector's conclusion in his March 2015 report - that the housing requirement figure of 20,985 homes for the plan period 2006-2026 is appropriate. the Secretary of State's decision has the effect of making policy CS13 part of the development plan.</p> <p>2015 - Part 1 Development Management Policies Examination</p> <p>2016 - Part 1 Development Management Policies adopted</p> <p>2017 - Part 2 Site Allocations Plan submitted and examination</p> <p>2017 - Inspector request that further sites for an additional 2,500 homes are found to add flexibility and choice and to ensure the Site Allocation Plan is capable of meeting the housing requirement of 20,985 homes.</p> <p>It is now more than ten years since the preparation of the Core Strategy began, which led to a housing requirement that as the Inspector said in his report had significant deficiencies and did not look beyond its boundaries. We therefore consider that North Somerset should now focus their efforts on the delivery of new additional homes in locations that complement the JSP process, via the identification of strategic housing sites that are capable of meeting the housing needs of the West of England and that provide homes in more sustainable locations, closer to the urban area of Bristol.</p>	

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		<p>It is considered that the sources of housing supply identified through the Site Allocation Plan should be widened, with emphasis given to the importance of meeting the housing needs of the West of England.</p> <p>In this context, there is a strong case for new development across North Somerset, and not only isolated to the 22 sites identified by the Site Allocations Plan.</p>	
Newland Homes	14889313//1	<p>I am writing on behalf of my client, Newland Homes, in respect of the consultation on the Proposed Main Modifications to the Site Allocations Plan. This representation covers the following matters:</p> <ol style="list-style-type: none"> 1. The LPA's decision not to undertake the work requested in the note from the Inspector following the closure of hearings on 18th May 2017. 2. The LPA's decision to only assess sites that were in the 'development pipeline' before the letter issued by the Inspector following the closure of hearings on 18th May 2017. 3. The deliverability of the sites subject to this consultation. <p>These issues are addressed in turn below.</p> <p>1. The LPA's decision not to undertake the work requested in the note from the Inspector following the closure of hearings on 18th May 2017</p> <p>In the note dated 18th May 2017 (ID4) the Inspector sets out the LPA's current position in terms of housing delivery. The key points are:</p>	<p> Appendix 1 - Request for Pre-Application Advice in respect of Land South of William Daw Close, Banwell.pdf (11.9 MB)</p>

Respondent Name	Comment ID	Comment	Attached documents
		<ul style="list-style-type: none"> • The housing requirement for the plan period (2006 to 2026) is 20,985 dwellings. • As of 31st March 2017 only 8,847 dwellings have been completed. This is a shortfall of 2,692 dwellings. • The residual requirement for the remaining 9 years of the plan period is 12,138 dwellings. • The 5 year housing land supply requirement should be calculated using a 20% buffer and the Sedgefield method for addressing any previous shortfall. On this basis the 5 year housing land supply requirement for 2017/18 to 2021/22 is 9,524 dwellings (1,905 dwellings per annum). The Inspector considers the rate of delivery predicted by the LPA to be optimistic, and concludes that a five year supply of housing is unlikely to be achieved. • The sites identified in the SAP would result in the delivery in 21,458 dwellings. However, the Inspector considers that the uncertainty as to the deliverability of a number of these sites means that it is unlikely that the Core Strategy requirement of 20,985 dwellings by 2026 will be achieved. <p>In order to address the above issues the Inspector advises the LPA that they need to identify allocations capable of delivering an additional 2,500 dwellings. At paragraph 20 to 22 of ID4 the Inspector states:</p> <p><i>"20. As to the scale of additional allocations which would be appropriate, a figure of 20% of the residual requirement of 12,138 dwellings was discussed at the hearings. A buffer based on 20% of the residual requirement would call for sites to accommodate some 2,500 additional units. A level of up to 2,500 units would also help to close the gap between the calculations of housing land supply produced by the Council and the</i></p>	

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		<p><i>development industry; and it would provide more certainty that the 20,985 dwellings required by the CS would be delivered by 2026.</i></p> <p><i>21. The Council and others indicated that the allocation of this additional amount of land could be difficult to achieve because of the environmental constraints to development within North Somerset. Furthermore, I have considered the advantages of getting the SAP adopted as early as possible against the additional time that would be required to bring forward additional sites. However, if the SAP is adopted in its current form with the high level of uncertainty as to the deliverability of allocated sites and in particular the need for more sites that can be developed within the next five years, it would fail to deliver the CS requirement or to ensure that the Council can maintain a 5 year housing land supply.</i></p> <p><i>22. Sources from which additional allocations can be sought have already been identified by the Council, and some preliminary work is being carried out to test for suitable sites. Having regard to the urgent need to boost the supply of housing, I consider that the Council should test the potential for the provision of up to 2,500 additional houses in order to identify the environmental costs of allocating a wider choice of housing sites. Furthermore, where new allocations are to be made, there is a need to identify and allocate sites which can be made available for development at an early date to help meet the five year supply as well as secure the overall delivery of the housing requirement by 2026."</i></p> <p>The instructions from the Inspector were clear and unambiguous. We were therefore extremely disappointed to note from the LPA's interim response (CD2) to the Inspector that they decided not to undertake the work that was requested.</p> <p>Firstly, at paragraphs 7 to 16 of CD2 the LPA attempt to reopen discussion on the figure of 2,500 dwellings and make the case for a lower figure. This is inappropriate as it is not</p>	

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		<p>within the scope of work requested by the Inspector, and is clearly an attempt to row back on what was agreed during the hearing sessions.</p> <p>Secondly, the LPA has not tested the “<i>potential for the provision of up to 2,500 additional houses</i>”. Even if all of the 28 sites on which the LPA sought comments on in August had been deliverable by 2026, they would have only delivered a total of 1,812 dwellings. This falls significantly short of the figure of 2,500 dwellings that the LPA was asked to test. As set out in the following section the reason that the LPA was only able to identify sites capable of delivering 1,812 dwellings was due to their decision to apply an unreasonable methodology for site selection.</p> <p>2. The LPA’s decision to only assess sites that were in the ‘development pipeline’ before the letter issued by the Inspector following the closure of hearings on 18th May 2017 (ID4)</p> <p>The key reason that the LPA has been unable to identify sufficient sites to meet the 2,500 dwelling requirement is the methodology that they have used. At paragraphs 24 and 26 of ID4 the Inspector states:</p> <p><i>“24. The following sources are identified by the Council for the additional allocations which are to be tested:</i></p> <ul style="list-style-type: none"> • <i>Sites which are broadly consistent with the Core Strategy spatial strategy (sites within or adjacent to Weston, the towns and service villages, but not infill villages, countryside or Green Belt).</i> • <i>Sites which have been considered through the SAP examination process.</i> 	

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		<p>• Sites which are in the development pipeline – as these are more likely to be deliverable and could potentially contribute to 5 year supply.</p> <p>25. In the identification of potential opportunities and in the comparative assessment of sites, I would urge the Council to work closely with the development industry. The aim should be to increase the likelihood of delivery through a wider choice of sites, and through the identification of sites which developers would commit to bringing forward within the timescale of the CS, and in particular within the first five years of the residual period to meet the shortfall in five year supply. Developers who wish to promote omission sites may assist the Council through the preparation of a delivery trajectory for those sites.”</p> <p>Despite this advice the LPA set out a different approach in CD2. They state:</p> <p>2. Paragraph 24 of your letter refers to three sources to form the framework for the testing of additional supply. We agree that this forms the starting point of the assessment.</p> <p>Sites broadly consistent with the Core Strategy spatial strategy. We will work on the basis that this should only include sites within or adjacent to Weston, the towns or service villages and previously developed land. We will not be testing sites in the Green Belt or at infill villages or in the countryside. There are sites being promoted now through the Site Allocations Plan that are more appropriately addressed as part of the strategic development locations in the Joint Spatial Plan with detailed allocations taken through the new Local Plan. The implications of these will be addressed through the assessment process.</p> <p>Sites considered through the SAP examination process. This assessment will only address those sites identified through the examination process</p>	


Respondent Name	Comment ID	Comment	Attached documents
		<p><i>which have also been demonstrated to be deliverable and therefore are also in the development pipeline.</i></p> <p><i>Sites which are in the development pipeline.</i></p> <p><i>All sites which have been submitted into the development management process (primarily pre-application advice or planning applications) will be assessed for their delivery. This process has already commenced. The landowners, developers or agents of sites have been contacted and asked to complete the attached housing deliverability questionnaire. All responses will be published on the Council's website.</i></p> <p><i>3. Following the hearings a number of sites have been submitted as planning applications or for preapplication advice. In order to identify a clear cut-off, we have included any such sites in our assessment which were received up to the date of the Inspector's letter.</i></p> <p>The main issue with the LPA's approach is that instead of looking at each of the three sources for potential allocations, they have applied them as criteria and are only assessing sites that fall within all three categories. This is not a sound methodology for identifying allocations as:</p> <ol style="list-style-type: none"> 1. There is no guarantee that the sites currently within the development pipeline are the most appropriate. In a situation where it is necessary to identify additional allocations it is unfair to exclude developers and landowners that have promoted their sites through the Site Allocation Plan process, but who had not applied for pre-application advice by 18th May 2017. 2. The decision to exclude sites on the basis that an application or pre-application request was not submitted before 18th May 2017 is arbitrary. There is no reason to 	

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		<p>conclude that these sites cannot deliver housing within the next 5 years or during the plan period.</p> <p>At paragraph 3 of CD2 (above) the LPA acknowledge that they have disregarded a number of sites that have been submitted as applications or pre-applications following the Inspector's letter. One of these sites is the Land South of William Daw Close, Banwell. The Supporting Statement that was submitted as part of the request for pre-application advice is included at Appendix 1 and:</p> <ul style="list-style-type: none"> • Demonstrates that the site conforms with the Core Strategy as it lies directly adjacent the settlement boundary of Banwell, one of the nine Service Villages. • Confirms that there are no technical constraints that would preclude the development of the site. • Includes a Sketch Layout which shows how a high quality development of around 58 dwellings could be delivered. • Confirms that the site can be delivered within the next 5 years. <p>The decision to exclude sites such as Land South of William Daw Close from the assessment is counterintuitive and contrary to the Inspector's request for the LPA to work closely with the development industry. It also means that the LPA was only able to identify sufficient sites to accommodate 1,812 dwellings (leaving aside the question of whether they are all deliverable).</p> <p>3. The deliverability of the sites subject to this consultation</p>	

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		<p>Given that it has already been established that the LPA has not identified sufficient sites to test the “<i>potential for the provision of up to 2,500 additional houses</i>” I do not propose to provide a detailed analysis of each of the 21 sites subject to this consultation. Nevertheless, there are a number of points that need to be made, both in general terms and in respect of specific sites:</p> <ul style="list-style-type: none"> • At least seven of the sites lie wholly or partially within Flood Zone 3a. A process that is not restricted to sites within the development pipeline would allow an assessment of whether there are sites in areas less vulnerable to flooding. • The residential site assessments that the LPA prepared for the August consultation advise that two of the sites were at that point allocated for employment use in the SAP. The sites are: <p>Land at Wilson Gardens / Scot Elm Drive, Weston-super-Mare: Employment. Furthermore, the requirement to introduce a drainage rhyne means that capacity is likely to be around 30 dwellings.</p> <p>Harbour Road / Serbert Way, Portishead: Employment.</p> <p>If these sites are allocated for housing the LPA should presumably allocate additional employment sites elsewhere to make up the shortfall. However, no additional employment allocations are proposed. In fact, the total quantum of the proposed employment allocations has been reduced by 2.5 ha.</p> • The Site Assessment for Queensway / Midhaven Rise, Weston indicates that the site is not available. In respect of availability it states: 	

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		<p data-bbox="539 328 1552 392">"No – the occupying football club will need relocating and no alternative site has been secured as yet"</p> <ul data-bbox="539 432 1576 564" style="list-style-type: none"> <li data-bbox="539 432 1576 564">• The planning application for Weston College, Somerset Square, Nailsea has been in since April 2015 and has not yet been determined. The Site Assessment advises that there are ownership issues holding up the planning application and that they are unlikely to be addressed in the short term. <p data-bbox="539 608 987 635">Conclusions and Recommendations</p> <p data-bbox="539 675 1563 951">The instructions from the Inspector on the work that LPA needed to undertake following the hearings are clear and unambiguous. It is therefore extremely disappointing that the LPA decided to row back on what was agreed during the hearing sessions, and has not tested the potential for the provision of up to 2,500 additional houses. Even if all of the 28 sites on which the LPA initially sought comments on in August had been deliverable by 2026, they would have only delivered a total of 1,812 dwellings. This falls significantly short of the figure of 2,500 dwellings that the LPA was asked to test.</p> <p data-bbox="539 991 1570 1267">As set out above the reason for the LPA's failure to identify a sufficient number of sites is due to the unsound methodology that they have used, in particular the decision to limit the scope of the assessment to sites that were in the development pipeline before the Inspector issued her note (ID4) on 18th May 2017. This decision is counterintuitive and contrary to the Inspector's request for the LPA to work closely with the development industry. It also results in the exclusion of a number of sites, such as the Land South of William Daw Close, that are in accordance with the Core Strategy and which could be delivered in the next 5 years.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>An initial assessment of the sites that the LPA has shortlisted for highlights the pitfalls of limiting the exercise to sites currently within the development pipeline. For example:</p> <ul style="list-style-type: none"> • At least seven of the sites lie wholly or partially within Flood Zone 3a. A process that is not restricted to sites within the development pipeline would allow an assessment of whether there are sites in areas less vulnerable to flooding. • Two of the sites are currently provisionally allocated for other uses in the SAP. These proposed uses would need to be re-provided elsewhere. However, no additional employment allocations are proposed. In fact, the total quantum of the proposed employment allocations has been reduced by 2.5 ha. • Two of the sites are unlikely to be deliverable due to land ownership issues. <p>In conclusion, the LPA's approach is fundamentally flawed as:</p> <ol style="list-style-type: none"> 1. They have not identified sufficient additional sites to address the significant shortfall in their 5 year housing land supply. 2. They have not identified sufficient additional sites to provide certainty that the overall housing requirement (20,985 dwellings) will be delivered during the plan period (2006 to 2026). 3. A number of the sites that they have identified are unlikely to be deliverable and are not necessarily preferable to those excluded from the process due to the LPA's arbitrary decision to only consider sites that were in the development pipeline before 18th May 2017. 	

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		<p>It must therefore be concluded that the Proposed Modifications are insufficient to make the Site Allocations Plan sound. Specifically, the Plan has not been 'positively prepared' and is not 'justified', two of the tests of soundness set out at paragraph 182 of the NPPF.</p> <p>In order to avoid address this issue I strongly urge the Inspector to pause examination and advise the LPA that they need to undertake a more thorough site assessment process that identifies sufficient sites to address the significant shortfall in the LPA's 5 year housing land supply, and ensure that they meet their overall housing requirement for the plan period.</p> <p>Finally, please note that I would like to appear at any future hearing sessions on the Site Allocations Plan.</p>	
Aston and Co	15574465//1	<p>Response to consultation closing Monday 30.10.17</p> <p>Item 1 – Site Allocations Plan examination: further residential site assessments in Response to the Examination in Public Between 16-18th May 2017</p> <p>An examination in public was undertaken into the North Somerset Council (NSC) draft Site Allocations Plan by the Planning Inspectorate from the 16th to 18th May. This tested how robust and sound the draft plan was and engaged with the development industry, members of the public, statutory bodies and other interested parties. Following the close of the hearings the Examiner wrote to NSC on two occasions [ID-4] and [ID-5] providing guidance on the further evidence based work necessary to ensure that the final plan secured delivery of Core Strategy (CS) Policy CS13. NSC have not</p>	<p> Aston_Co_SAP_Response_23.10.17.pdf (721 KB)</p>

Respondent Name	Comment ID	Comment	Attached documents
		<p>followed with this further guidance and for that reason the updated draft SAP document is considered unsound:</p> <p>Feedback on the process adopted for the further testing of the Site Allocations Plan (SAP) by NSC</p> <p>In the Examiners first letter following the hearing [ID-4] she requested NSC test the provision of additional housing for up to 2,500 dwellings to provide flexibility and certainty in achieving the housing target set in Policy CS13 and thereby demonstrate a 5-year land supply. The Inspector;</p> <p>-acknowledged the constraints affecting delivery highlighting the key constraint within the district being flood and surface water drainage which impacts viability and lead times (para.14), and;</p> <p>-noted the fact that saved Local Plan sites brought forward in the SAP have been identified for delivery of housing but have not been implemented (para.14);</p> <p>-highlighted that unallocated housing schemes (Policies CS28, CS31 & CS32) could be brought forward to increase flexibility but stated "<i>However, the scale of such schemes is restricted and without the benefit of a positive allocation in the SAP, the negotiation of planning permission could delay delivery.</i>";</p> <p>-made a considered decision to delay the adoption of the SAP in order to provide greater certainty on deliverability within the next 5 years, thereby meeting the CS requirement for 5-year supply (para.21);</p> <p>-urged NSDC to work closely with the development industry (para.25).</p>	

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		<p>Aston & Co attempted to engage with the NSC following the examination having submitted a housing site (up to 306 units) into the West of England Joint Strategic Partnership in November 2016 (Ref: 504637) and into the NSC Call for Sites in January 2017 (Receipt acknowledged by NSC on 3.02.17). This site is being promoted for development on the following basis;</p> <ul style="list-style-type: none"> -It directly abuts the settlement boundary at Portishead which is a second tier settlement within the NSDC hierarchy; -It lies outside of the key flood risk constraint that affects much of the land at Portishead; -Historically it lies between the two industrial areas of Black Rock Quarry with its railway connections to Portishead and the former Docks (now Portishead Marina); - Whilst currently located within the Green Belt the Phase 2 report [Part of cell 74c pages 18 and 170] from the West of England JSP acknowledged its '<i>limited contribution</i>' and more detailed landscape and visual assessment work by The Landmark Practice demonstrates a robust case in support of the lifting of the Green Belt (via the JSP process) and its allocation for housing; -Robust evidence in support of this site is already available in detailed reports from The Landmark Practice (Ecology and Landscape), Connect Consultants Ltd (Transport and Highways), Flood Risk (Environment Agency), Green Belt (Aston&Co/The Landmark Practice) and Cultural and Historical Context (Aston&Co). <p>No engagement occurred because NSC stated that since the site at Portishead is located within Green Belt it should continue to be promoted via the West of England JSP and this meant it was outside of the parameters set by the Inspector [3.07.17]. However, the</p>	

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		<p>Inspectors letter suggests at para.24 that the council set the parameters for identifying and testing additional allocations.</p> <p>Irrespective of the outcome for the parcel of land being promoted by Aston & Co NSC have through the parameters they selected identified an additional supply of only 821 Units (representing just 33% of the target set by the Examining Inspector of 2,500). This is wholly inadequate and will lead to a continued shortfall in delivery making the proposal unsound.</p> <p>It is recognised that NSC in common with other local authorities have tough choices to make to deliver much needed housing but solutions are available. Bath and North East Somerset (BANES) is a good example. The major constraint in that district is not flood risk but World Heritage Status for much of the city which means that housing land that will not affect views out from and into the city is very hard to find.</p> <p>BANES made a decision to release Green Belt land at East Keynsham for an initial 250 houses with additional former Green Belt land safeguarded to expand that at a later date [See The Planning Inspectorate Report, 24.06.14,]. The choice was made of minor alterations to the Green Belt to safeguard the City's World Heritage status in preference to adverse effects on the City's World Heritage Status.</p> <p>Within North Somerset Council the primary development constraints are Flood Risk and Green Belt. Flood Risk mapping is regularly updated by the Environment Agency and over the last 20 years in line with world climate science the areas predicted to be at risk have been enlarged. At Portishead the tidal defences are not impenetrable and leave much of the town at high risk – Flood Zone 3.</p> <p>The North Somerset Council's Stage 2, Strategic Flood Risk Assessment 2009 highlights the following issues affecting Portishead:</p>	

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		<p>-Level of risk – <i>"Due to the low lying land of the Somerset Levels and potential threat of severe tidal inundation across NSC area, a third of the properties across the study area are located in areas at risk of flooding from both rivers and the sea."</i> (section 1.3, page 2).</p> <p>-<i>Area 1: coastal strip from south of Clevedon to Ham Green - Flood risk due to failure of defences is a significant potential issue for Area 1 with almost a third of the area in the 1 in 200 year tidal flood extents for the undefended situation (2.1.1).</i></p> <p>-<i>Flood depths can reach up to 3.2m at the 1 in 5 year event (rising to 3.7m at the 1 in 200 year event) which, regardless of the velocity of the flood waters makes the degree of flood hazard extreme, with danger for all including the emergency services (2.1.1).</i></p> <p>-<i>Between Portishead and Royal Portbury Docks, the standard of protection also varies between 1 in 5 and 1 in 100 year levels (4.2.1).</i></p> <p>-<i>Pages 80-81 of the report identify £6M of expenditure necessary to raise the existing coastal barriers by up to 2.79m to safeguard existing land.</i></p> <p>At Portbury Wharf defences are only sufficient for a 1 in 5 year event, storm water drainage from new development is reliant on discharge to the sea which cannot be undertaken during high tide limiting the storm water drainage capacity of the historic rhyne system for the Gordano valley.</p> <p>The report models the risk of a 1 in 25 event and light green shading illustrates 1.5-2m flood water in areas of new development at Portishead east of the Marina. This land was historically used as industrial and commercial for good reason.</p>	

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		<p>It cannot therefore be sensible to allocate land for long term residential use and investment when that land is situated within designated flood plain (Flood Zone 3) and when Central Government is planning for managed retreat of some low lying areas of the UK. Such land should not be zoned for development. A number of the sites within the SAP are within Flood Zone 3 and should be removed. Great weight must be attached to flood risk constraints in all site allocation decisions.</p> <p>Of particular note when the history and purpose of the introduction of the Bristol and Bath Green Belt is reviewed its primary purpose was stated as follows:</p> <p><i>"Reasons for the Green Belt – (1) It is considered that any substantial expansion of the built up areas of Bristol and Bath into the County of Somerset should be checked: also the merging of Bristol, Keynsham, Saltford and Bath should be prevented and the identity and existing character of the surrounding towns, villages and hamlets should be preserved."</i> (County of Somerset Development Plan, Bristol and Bath Green Belt Amendment 12, 1966, page 1 (1) [Somerset Record Office Ref: CPL2/65].</p> <p>That clearly stated purpose was not to prevent development adjacent to settlement boundaries in areas such as Portishead. Furthermore, the decision of BANES at East Keynsham illustrates a progressive sensible review by a Local Planning Authority of all available development land. BANES assessed all options for each land parcel against the full range of planning constraints to find the best solutions with the minimum adverse effects. That process was supported by the Examining Inspector ahead of adoption (See the Inspectors Report paras 194-208).</p> <p>At Portishead and other settlements within NSC the choice to allocate land for additional housing is now between Green Belt, or flood risk. As illustrated above much of the recent development at Portishead is within Flood Risk Zone 3. It cannot be</p>	

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		<p>sensible nor in accordance with policy to invest in hard infrastructure within flood risk areas when suitable alternatives exist.</p> <p>Sites exist in sustainable locations set outside of the flood risk zones for example, the land adjacent the settlement boundary at North Weston, Portishead being promoted through the West of England JSP and NSC Call for Sites 2017 by Aston and Co UK (Ref: 504637).</p> <p>In summary;</p> <ol style="list-style-type: none"> 1. NSDC have not met the Inspectors requirement to test for an additional 2,500 houses to provide a realistic prospect of meeting the 5-year land supply need. 2. All local planning authorities face challenges to meet housing need but a fresh ‘blinkers off’ approach needs to be adopted. There are solutions – East Keynsham is a good example where former Green Belt land has been removed through the plan process and allocated for housing; 3. NSC have a track-record of non-delivery on housing numbers and that needs to be addressed. This is a planning issue but this also affects young people’s lives and needs to be solved now; 4. Proper engagement by NSC with all interested developers, promoters, agents and directly with land owners will assist identify opportunities and can provide valuable evidence (3rd party expert reports etc.) into the process to enable intelligent, evidenced based decision making; 5. Publication of an accessible up to date proposals map that identifies all land with consent, in the consenting process (pre-app etc.), being promoted, or being actively 	

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		<p>reviewed would bring more helpful evidence into the process. Information from the NSC call for sites ‘2017’ has not yet been made public and was captured by NSC in Feb 2017? Making this information available now would enable land promoters, land owners and developers to positively contribute to the site evaluation process at an earlier stage thereby reducing the overall time to develop and conclude robust evidence based planning policy;</p> <p>6. NSC has now postponed the initial consultation on its Replacement Local Plan that was due to commence this Autumn. That delays bringing forward new sites and evidence for robust decision making. The existing SAP should include the ‘call for sites 2017’ and any and all site information so that it is inclusive, thorough, results in sound policy and meets the 2,500 target set by the Inspector following the public hearings, and;</p> <p>7. All information regarding future land use should be published upon receipt to ensure a transparent, efficient and fair policy development process that everyone can have full confidence in.</p> <p>If items 1-7 are not addressed fully now NSC will remain an authority without a sound 5-year housing supply, housing will continue to be built in unsustainable locations (within the flood zone) building up problems for future generations. Rather than solving problems such a situation would fail the emerging adults within the District as it will inevitably lead to inadequate housing delivery and houses delivered in unsuitable areas prone to flooding.</p> <p>Item 2 - Feedback on the Site Allocations Plan (SAP) - Main Modifications Consultation by NSC</p>	

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		<p>Details of the process undertaken by NSC to identify and test for the provision of additional houses is set out on the NCS website. The following deficiencies are highlighted in the approach that was adopted:</p> <p>Narrow review – The narrow approach of the review is the reason for NSC only being able to identify land for 821 new units, a figure representing just 33% of the target set by the Examiner to meet Policy CS13. This occurred for two reasons:</p> <ol style="list-style-type: none"> 1. The review focused on the draft list of sites within the development management system that NSC tabled at the hearings (examination document ED36). It could instead have included sites put forward within the West of England JSP process and NSC Call for Sites 2017, and; 2. The analysis of the sites on the list should have been tested against the full range of planning constraints and to achieve the required number should have also included sites identified within the West of England JSP Green Belt review - Phase 2 report. That report identifies potential land that could be released from Green Belt to satisfy housing need. <p>Flood Risk Weighting – North Somerset Council’s Strategic Flood Risk Assessment is described above. Portishead and much of North Somerset comprises low lying land protected from coastal flooding by sea defences and with surface water drained to the sea via a network of rhyes during periods of low tide.</p> <p>The Strategic Flood Risk Assessment highlights the severity of the risks. That document is essential to effective evidence based plan led policy making and is now nearly 9 years old and should be updated.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>NSC need to make plan led policy, land use allocation and development consent decisions based on robust flood risk assessment data and should as a starting point seek to allocate/plan all development to be located outside of the flood risk zones.</p> <p>16/P/2066/F, Harbour Road, Gordano Gate – the initial report for this site contains 3.5 pages of written text and an EA public website map. That is wholly inadequate for development decisions in FZ2/3. NSC’s strategic flood risk report identifies the need to ensure that such reports provide adequate evidence based information and sets of the need for expenditure of £6M (2009 figures) to reinforce existing coastal defences in Area 1 (Portishead, Clevedon and the Gordano Valley – pages 80-81).</p> <p>Site Deliverability Information – Whilst Q2) of NSC’s ‘Deliverability Questionnaire’ asks "<i>Is this site in the control of a house builder</i>" no evidence was sought, nor supplied in the form of signed Heads of Terms, signed Option agreements, or Land Registry Title to validate this information.</p> <p>Item 3 – Feedback on the Final – Publication Version of the North Somerset Council Sites and Policies Plan Part 2: Site Allocations Plan 2006-2026</p> <p>The following feedback is made against the paragraphs referenced:</p> <p>1.6, page 6 - "<i>Now that the Core Strategy housing target has been confirmed as 20,985 dwellings 2006-2026</i>" – To achieve this we agree with the Inspectors findings at the public hearings - land for an additional 2,500 units needs to be identified.</p> <p>1.7 – The timetable for adoption of the Site Allocations Plan is now slipping considerably and as a consequence the commencement of the Replacement Local Plan consultation has been delayed from October 2017 to some point in 2018. A step change</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>in progress is necessary or NSC will continue to fail in delivering the housing the district urgently requires. Target dates should be stated.</p> <p>2.8 A key component introduced to the adopted CS under examination of the remitted policies was flexibility for development within and adjacent to the settlement boundaries. As a matter of balance this important change should be reflected in this list.</p> <p>4.2 comment as 1.6 - more land needs to be identified to ensure delivery of the CS commitment.</p> <p>4.3 This paragraph lists the development constraints at Clevedon, Nailsea and Portishead but importantly fails to mention the flexibility introduced following the remitted policy examination. Policies CS31 states "<i>At these towns, new housing development within and adjoining settlement boundaries which is of an appropriate scale and of a high quality design that respects each town's distinctive character and local environment, delivers necessary infrastructure improvements and enhances overall sustainability will be supported.</i>".</p> <p>This resulted from drafting amendments following the Inspectors report which in the non-technical summary stated "MM04 – Policy CS31: Clevedon, Nailsea and Portishead. The housing requirement is altered and rounded, restrictive wording is removed and the facility is provided to allow unallocated development outside but adjoining the settlement boundary of up to around 50 dwellings."</p> <p>There is a note on this point against the text to Table 1 and later at 4.9 but this does not sufficiently highlight the importance that it seems clear the Inspector considered necessary when reporting on the remitted policies. The wording should be updated to reflect the balance of constraints and policy support for appropriate development within and adjoining settlements.</p>	


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		<p>4.4 Difficult choices have to be made. Based on evidence within the Green Belt review undertaken by the West of England JSP there are opportunities to provide housing outside of the flood risk zones. An updated Strategic Flood Risk Assessment is required by NSC to inform policy development. Much has changed since 2009.</p> <p>4.7/4.8 Portishead is a higher order settlement than the service villages. With the forthcoming Metro West link to Bristol, residential development at the settlement boundaries outside of the flood zone should be reviewed alongside development of the West of England JSP. This work should include drawing on evidence from the Green Belt (GB) Review and making pragmatic choices as Bath and North East Somerset have led the way on releasing land from GB at East Keynsham.</p> <p>Table 1 Housing – The numbers do not allocate sufficient land to achieve the CS commitments as set out by the Planning Inspector following examination in her letter dated 26 June 2017 [ID-4].</p> <p>4.10 – The drafting does not reflect the changes recommended during examination of the CS and adopted into CS policy in CS31 where the inspector set out the need for flexibility for unallocated housing ‘for up to around 50 dwellings’ The changes provided additional flexibility for development alongside settlement boundaries.</p> <p>4.11 reference to the remitted policies</p> <p>4.32 The new text highlighting the importance of protecting existing employment land use against displacement to residential is welcome. However, against this policy why has the assessment of the following sites not dismissed a proposed change from employment to residential: 16/P/2066/F, Land at Harbour Crescent, Serbert Road, Portishead, BS20 7FT</p>	

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		<p>A material consideration in the Officer's report, states "<i>The current land allocation at Portishead is currently being reassessed in order to help meet the Council's housing requirements in accordance with the Inspector's comments and the re-adopted policy CS13</i>". As the Town Council consistently highlighted and in line with NSC policies employment land is essential for Portishead and is constantly being eroded by enabling change of use of such land to residential. More rigorous testing of the justification for such change of use should be employed using the services of the Valuation Office Agency.</p> <p>4.33 Agreed patterns of work are changing. NSC policy needs to embrace and set policy for 'live-work' units in urban but more particularly rural locations. The Government supported roll-out of fast fibre to the premises will over the plan period provide huge opportunities to beneficially reduce commuting, reduce travel and thereby ease pressures on the existing transport systems.</p> <p>The Policy H7 guidance note regarding the beneficial use of 'live work' units within settlement boundaries was welcome but this same approach need to be extended to rural communities including for example the conversion, or replacement of agricultural or storage buildings to help sustain the rural economy.</p> <p>Policy SA4 – this policy is supported but all developers will be financially driven to seek to change of use from employment to residential use for financial gain. It is essential that all LPA's robustly defend such applications requiring a high test. That should include production of robust evidence in support of a change of use and LPA's will probably need to buy in the necessary expertise to test that evidence to ensure it is sound.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		Please see attachment for inset diagrams.	
Nailsea Holdings LVA LLP	16098881//1	<p>SITE ALLOCATIONS PLAN EXAMINATION: Proposed Modifications Consultation to the Site Allocations Plan</p> <p>I am writing on behalf of our client, Nailsea Holdings LVA LLP, in respect of the above consultation. This follows similar submissions sent to the Council in August 2017.</p> <p>In the first instance our client welcomes the removal of land North of Greenfield Crescent and Woodland Road, Nailsea as proposed Strategic Open Space (community facilities).</p> <p>This representation covers the following matters:</p> <ol style="list-style-type: none"> 1. The LPA’s decision not to undertake the work requested in the note from the Inspector following the closure of hearings on 18th May 2017. 2. The LPA’s approach to identifying potential new housing allocations. <p>The key reason that the LPA was unable to identify sufficient sites to meet the 2,500 dwelling requirement is the methodology that they have used, specifically:</p> <ol style="list-style-type: none"> 1. The LPA has decided to exclude sites where an application or pre-application request was not submitted before 18th May 2017. 	

Respondent Name	Comment ID	Comment	Attached documents
		<p>2. The LPA has decided to exclude any sites that do not fully comply with the Core Strategy. Despite the Inspector noting at paragraph 23 of ID4 that:</p> <p>"A further potential constraint to the identification of additional allocations is the distribution of housing identified in Policy CS14. However, CS14 refers to the "broad distribution of new dwellings" which indicates that the net additional dwellings listed in the policy do not constitute a straight jacket to be achieved, and that there is some flexibility for the distribution of housing provision within the settlement hierarchy in the CS."</p> <p>This methodology has resulted in the LPA discarding a number of sites that could enable them to achieve the 2,500 dwelling requirement.</p> <p>At paragraph 22 of the note issued on 18th May 2017 (ID4) following the closure of hearings the Inspector states:</p> <p>"I consider that the Council should test the potential for the provision of up to 2,500 additional houses in order to identify the environmental costs of allocating a wider choice of housing sites. Furthermore, where new allocations are to be made, there is a need to identify and allocate sites which can be made available for development at an early date to help meet the five year supply as well as secure the overall delivery of the housing requirement by 2026."</p> <p>The instructions from the Inspector were clear and unambiguous. We were therefore extremely disappointed to note from the LPA's interim response (CD2) to the Inspector that they decided not to undertake the work that was requested.</p> <p>Firstly, at paragraphs 7 to 16 of CD2 the LPA attempt to reopen discussion on the figure of 2,500 dwellings and make the case for a lower figure. This is inappropriate as it is not</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>within the scope of work requested by the Inspector, and is clearly an attempt to row back on what was agreed during the hearing sessions.</p> <p>Secondly, the LPA has not tested the “<i>potential for the provision of up to 2,500 additional houses</i>”. <i>Even if all of the 28 sites on which the LPA sought comments on in August had been deliverable by 2026, they would have only delivered a total of 1,812 dwellings. This falls significantly short of the figure of 2,500 dwellings that the LPA was asked to test.</i></p> <p>2. The LPA’s approach to identifying potential new housing allocations</p> <p>The key reason that the LPA was unable to identify sufficient sites to meet the 2,500 dwelling requirement is the methodology that they have used, specifically:</p> <p>1. The LPA has decided to exclude sites where an application or pre-application request was not submitted before 18th May 2017.</p> <p>2. The LPA has decided to exclude any sites that do not fully comply with the Core Strategy. Despite the Inspector noting at paragraph 23 of ID4 that:</p> <p>"A further potential constraint to the identification of additional allocations is the distribution of housing identified in Policy CS14. However, CS14 refers to the “broad distribution of new dwellings” which indicates that the net additional dwellings listed in the policy do not constitute a straight jacket to be achieved, and that there is some flexibility for the distribution of housing provision within the settlement hierarchy in the CS."</p> <p>This methodology has resulted in the LPA discarding a number of sites that could enable them to achieve the 2,500 dwelling requirement.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Conclusions and Recommendations</p> <p>The removal of land North of Greenfield Crescent and Woodland Road, Nailsea as proposed Strategic Open Space (community facilities) is welcomed. However, the changes to The Proposed Modifications are insufficient to make the Site Allocations Plan sound. Specifically, the Plan has not been 'positively prepared' and is not 'justified', two of the tests of soundness set out at paragraph 182 of the NPPF.</p> <p>In order to address this issue we strongly urge the Inspector to pause examination and advise the LPA that they need to undertake a more thorough site assessment process that identifies sufficient sites to address the significant shortfall in the LPA's 5 year housing land supply, and ensure that they meet their overall housing requirement for the plan period.</p>	
Nigel Bennett (Magenta)	16686977//1	<p>OBJECTION TO POLICIES SA1 HOUSING ALLOCATIONS & SA2 SETTLEMENT BOUNDARIES</p> <p>On behalf of our clients (the freeholder owners of No3 Main Road, Cleeve), we wish to object to the above emerging Local Plan document and policies on the basis that the potential new housing sites identified (ie. 22 sites resulting in approximately 821 units) falls woefully short of the Inspector's recommendation to find up to an additional 2,500 dwellings.</p> <p>The Local Planning Authority (LPA) have therefore failed to address the serious lack of housing supply issue that is preventing a sound and robust plan from being delivered.</p>	<p> Representations July 2017.pdf (1.1 MB)</p>

Respondent Name	Comment ID	Comment	Attached documents
		<p>We are advised by the LPA to pursue our site specific interest through the forthcoming Joint Spatial Plan Consultation and we will of course follow this advice; see planning report attached. However, there is an opportunity now for the Authority to assess a 'wider choice of sites' as recommended by the Inspector. This should properly include opportunities in and around the 'infill villages' (such as Cleeve), which could then play a much wider role in achieving the plan's objectives to deliver housing and sustainable growth.</p> <p>Logical opportunities to extend and/or round off settlement boundaries in circumstances where no planning harm is caused could appropriately provide part of the solution for the LPA. Our concern presently is that the Council is placing far too much reliance on the delivery of the major urban extensions at Weston-super-Mare and there is an overly optimistic view being taken on how quickly these sites can be delivered. This results in a disproportionate approach to achieving sustainable growth for the district.</p> <p>Whilst the Authority have already accepted the need for an early review, in the light of the serious shortfall of housing supply against their objectively assessed needs and the Inspector's clear advice, why delay?</p> <p>Rather, there is an opportunity to address the issue now, through a more wide-ranging testing of available sites, that are deliverable in the short term, rather than storing up a problem for later. In this regard, our clients have an oven ready site that would deliver new housing at a sustainable location, with a draft scheme ready to be advanced through a pre-application process at any time.</p> <p>We therefore look forward to establishing a positive dialogue with the LPA that will enable this opportunity to be advanced as soon as possible.</p> <p>A copy of representations at the previous stage is attached.</p>	


Respondent Name	Comment ID	Comment	Attached documents
Highways England	17440577//1	<p>I refer to the public consultation on the Proposed Modifications to the North Somerset Site Allocations plan. Set out below is Highways England’s formal response to the consultation.</p> <p>Highways England has been appointed by the Secretary of State under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network. Within North Somerset, the Strategic Road Network comprises the M5 motorway.</p> <p>The Strategic Road Network is a critical national asset and Highways England is responsible for ensuring that it operates and is managed in the public interest, both in respect of current activities and needs, and in providing effective stewardship of its long- term operation and integrity.</p> <p>Policy</p> <p>Highways England policy relevant to the acceptability of new developments is set out in Department for Transport Circular 02/2013 – "The Strategic Road Network and the Delivery of Sustainable Development". Paragraphs 9, 10 and 11 of the Circular summarise the correct approach to development proposals as follows:</p> <p><i>"9. Development proposals are likely to be acceptable if they can be accommodated within the existing capacity of a section (link or junction) of the strategic road network, or they do not increase demand for use of a section that is already operating at over-capacity levels, taking account of any travel plan, traffic management and/or capacity enhancement measures that may be agreed. However, development should only be</i></p>	


Respondent Name	Comment ID	Comment	Attached documents
		<p><i>prevented or refused on transport grounds where the residual cumulative impacts of development are severe.</i></p> <p><i>10. However, even where proposals would not result in capacity issues, the Highways Agency's prime consideration will be the continued safe operation of its network.</i></p> <p><i>18. Capacity enhancements and infrastructure required to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs".</i></p> <p>Applying the principles of paragraph 9 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a section that is already operating at over-capacity levels, or cannot be safely accommodated, ie, a development which adds traffic to a junction which already experiences road safety issues; would increase the frequency of occurrence of road safety issues; or would in itself cause those road safety issues to arise, would be considered to have a severe impact.</p> <p>These principles are reflected in the NPPF which (at paragraph 162) requires that local planning authorities should work with other authorities and providers during the plan making process to assess the quality and capacity of infrastructure for transport and its ability to meet forecast demands.</p> <p>The aim of this cooperation is to arrive at a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development. (NPPF paragraph 181).</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Pursuing sustainable development requires careful attention to viability and costs. The sites and the scale of development identified in the plan should not be subject to such a scale that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as infrastructure contributions or other requirements, should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. (NPPF paragraph 173)</p> <p>It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. (NPPF paragraph 177).</p> <p>In terms of identifying the necessity of transport infrastructure, NPPF confirms that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. (NPPF paragraph 32).</p> <p>For the Plan to satisfy the requirements of NPPF it would therefore need to be supported by an assessment of the infrastructure necessary to ensure that traffic impacts are not severe. Highways England would be content with the proposed allocations if the identified infrastructure satisfied the requirements of Paragraph 9 of Circular 02/2013.</p> <p>The Local Highway Authority will have their own criteria and it should also be noted that the requirements of the Plan, in terms of providing the necessary housing, may require additional infrastructure to be identified, particularly in relation to existing issues which would be beyond the remit of Highways England to consider.</p> <p>The Plan</p> <p>The purpose of the Site Allocations Plan is to deliver the key policies set out in the Core Strategy. These include:</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>-the housing needed within North Somerset;</p> <p>-policies related to the delivery of additional employment growth;</p> <p>-policies that will protect the environment; and</p> <p>-provide additional facilities for leisure and social and community uses.</p> <p>Proposed Modifications consultation</p> <p>On first review of the consultation information available for this Proposed Modifications consultation, Highways England noted that there was no update to the ‘NSC response to Matter 4 – Transport’. This note had been produced in response to Highways England’s letter dated 19th December 2016 that noted that ‘none of the evidence base documents referred to in Section 3 of the Plan relate to highways or transport infrastructure and no further evidence base documents have been published to support this consultation’.</p> <p>The omission of an update was brought to the attention of North Somerset Council and an addendum to the ‘NSC response to Matter 4 – Transport’ was added on 23rd October 2017 and the updated version of the ‘NSC response to Matter 4 – Transport’ note sent to Highways England on 25th October 2017.</p> <p>The response below has been prepared in response to the addendum assessment.</p> <p>Transport Evidence Base - addendum</p> <p>The addendum to the Transport Evidence Base notes that Highways England accepted the original assessment at the public hearing held on 18th May 2017.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>The addendum assessment considers the additional 821 dwellings that have been allocated as a result of the Inspector’s comments. The assessment identifies that the 821 dwelling increase is a 4% increase on the original total, and that the new sites were dispersed across the district. The original assessment undertaken reported that the impact of sites on the SRN was not significant. The addendum assessment says that the relatively small increase in dwelling numbers and the dispersed nature of their origin does not change the original conclusion that the impact is not significant.</p> <p>Highways England assessment</p> <p>Highways England accepts that the increase in housing numbers is relatively small (4%), and that the location of the sites is dispersed. Reviewing the locations of the new site allocations, it is noted that there is a larger proportion of new sites are in the vicinity of Weston-super-Mare, Clevedon and Portishead. All these locations have access to the M5. There are, though, allocations further afield in Nailsea, Winscombe and Churchill. These sites have relatively poor access to the M5 and alternative routes to Bristol. Hence, Highways England agrees that the sites are dispersed, albeit with a bias towards the M5 corridor.</p> <p>As the original note describes, there are a number of highway improvement schemes being promoted by NSC and Highways England to upgrade the key approach roads to M5 Junctions 19 and 21. These schemes will help the accommodation of growth. It is noted that there has not been any detailed assessment presented of the capability of these schemes to accommodate the forecast growth from the modified plan. However, the detailed assessment of each site will be considered on its own merits.</p> <p>On balance, and mindful of the likely impact in any one location and whether this impact would constitute a severe impact, the need to undertake a proportionate assessment for the scale of impact has guided the conclusion drawn by Highways</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>England. The conclusion drawn is that the additional growth identified in the Modifications for the Plan does not change the original view that the impacts of the proposed allocations, when the identified schemes are in place, do not constitute a severe impact on the SRN.</p> <p>I hope you find the above useful. If there are any queries or matters raised above which would warrant additional discussion then please contact me on the telephone number at the head of this letter.</p>	
St Modwen	17520001//1	<p>Please refer to covering letter and attached submissions with regards to the Council's overall approach to the Modifications and the sites included in Schedule 1 and 2.</p> <p>Summary:</p> <ul style="list-style-type: none"> • The council should seek deliverability trajectory updates on the omission sites and work with the development industry to understand their position on these sites • The council must not discount omission sites which are not in the development pipeline if they are broadly consistent with the Core Strategy • The council must not discount sites which are within the proposed Strategic Gaps • The council should not just reassess sites which are broadly consistent with the Core Strategy and in the development pipeline • The council is wrong to seek to reopen the additional housing requirement of 2500 dwellings as this was clearly identified by the Inspector • The council still cannot demonstrate a five year land supply 	<p> GVA St Modwen NSC SAP Proposed Modifications 27-10-17 Final combined.docx.pdf (9.2 MB)</p>

Respondent Name	Comment ID	Comment	Attached documents																								
Redcliffe Homes (GL Hearn)	17557313//1	<p>North Somerset Site Allocations Plan: Main Modifications Representations on behalf of Redcliffe Homes October 2017</p> <p>AM6: Paragraph 4.7</p> <p>1.1 The broad distribution of the residual housing requirement has been updated through the Main Modifications to reflect the Council's latest position. It is noteworthy that the figures struck-through are the figures presented through the publication version of the Site Allocations Plan (SAP) rather than the updated figures presented to the Inspector at the SAP Examination hearing sessions.</p> <p>1.2 The table below compares the figures presented to the examination with the Main Modifications:</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Examination (May 2017)</th> <th>Main Modifications (September 2017)</th> <th>% Change</th> </tr> </thead> <tbody> <tr> <td>Weston Urban Area</td> <td>12,869</td> <td>12,979</td> <td>0.8%</td> </tr> <tr> <td>Towns</td> <td>5,063</td> <td>5,456</td> <td>7.7%</td> </tr> <tr> <td>Service Villages</td> <td>2,196</td> <td>2,412</td> <td>9.8%</td> </tr> <tr> <td>Elsewhere</td> <td>1,330</td> <td>1,438</td> <td>8.1%</td> </tr> <tr> <td>TOTAL</td> <td>21,458</td> <td>22,285</td> <td>3.8%</td> </tr> </tbody> </table>	Location	Examination (May 2017)	Main Modifications (September 2017)	% Change	Weston Urban Area	12,869	12,979	0.8%	Towns	5,063	5,456	7.7%	Service Villages	2,196	2,412	9.8%	Elsewhere	1,330	1,438	8.1%	TOTAL	21,458	22,285	3.8%	<p> GL Hearn.pdf (510 KB)</p>
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		<p>1.3 Redcliffe Homes raises no objection to AM6 in terms of the broad distribution of housing, although objections are raised in respect of MM1 to the overall housing supply.</p> <p>MM1: Table 1 - Housing Requirement</p> <p>1.4 As noted in respect of AM6, the updates to Table 1 represent the changes since the publication version of the SAP and therefore do not take account of the revised figures presented to the examination hearing sessions.</p> <p>1.5 The table below provides a chronological record of the updates to the figures and therefore clarifies the degree of change which the Council has brought into effect since the Inspector's comments confirmed in ID4</p> <p>Table 1: As Amended Since October 2016</p> <table border="1" data-bbox="539 874 1574 1377"> <thead> <tr> <th></th> <th>Publication Version (October 2016)</th> <th>Executive Meeting (February 2017)</th> <th>Examination Hearings (ED28) (May 2017)</th> <th>Main Mods (September 2017)</th> </tr> </thead> <tbody> <tr> <td>Completions 2006-2016</td> <td>7,995</td> <td>7,995</td> <td></td> <td></td> </tr> <tr> <td>Completions 2006-2017</td> <td></td> <td></td> <td>8,847</td> <td>8,847</td> </tr> </tbody> </table>		Publication Version (October 2016)	Executive Meeting (February 2017)	Examination Hearings (ED28) (May 2017)	Main Mods (September 2017)	Completions 2006-2016	7,995	7,995			Completions 2006-2017			8,847	8,847	
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Respondent Name	Comment ID	Comment					Attached documents
		Proposed allocations and large sites with planning permission	11,525	11,755	11,307	12,124	
		Other large sites with consent (not proposed allocation)	161	161	71	71	
		Small sites (10% lapse rate)	473	473	578	588	
		Windfall allowance	897	897	655	655	
		TOTAL	21,051	51,281	21,458	22,285	
		<p>1.6 The publication version of the SAP was based on the completions up to 2016 (7,995) however the Inspector's comments in ID4 were based on NSC's updated completions as at April 2017 (8,847).</p>					

Respondent Name	Comment ID	Comment	Attached documents
		<p>1.7 The figures presented within Table 1 of the Main Modifications (SAP Version incorporating proposed modifications) are therefore misleading as the figures struck-through are based on the 2016 housing supply data rather than the updated position at 2017, which was before the Inspector at the examination.</p> <p>1.8 As a result, Table 1 infers that the main modifications achieve an uplift in the overall housing supply of 1,234 units (21,051 – 22,285). However, the Inspector based her findings (ID4) on the updated 2017 housing supply figures shown in Column 3 of the table above – a supply of 21,458 dwellings - hence the main modifications increase the overall housing supply by only 827 units, to 22,285 dwellings.</p> <p>1.9 In her conclusions, the Inspector confirmed that:</p> <ul style="list-style-type: none"> - The Council is unable to demonstrate a 5 year housing supply based on the Sedgefield methodology and a 20% buffer, which is necessary to recognise the persistent under-delivery of housing over the plan period. - In light of the uncertainty over the deliverability of sites identified within the SAP, a more significant buffer is required within the SAP than the current exceedance of the CS requirement of 473 units (2.3%), as identified within ED28. <p>1.10 The Inspector was clear in her findings that if the SAP was adopted in its current form it would fail to deliver the Core Strategy requirement or ensure the Council could maintain a 5 year supply (paragraph 21, ID4) and therefore be found unsound.</p> <p>1.11 NSC has responded with the proposed allocation of an additional 821 units, which falls significantly below the Inspector’s target of 2,500 units and fails to secure the assurances sought by the Inspector.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>1.12 The overall housing supply increases to 22,285, representing a 6.1% exceedance of the Core Strategy requirement, compared with the 12% exceedance sought by the Inspector to achieve adequate flexibility in the housing supply.</p> <p>1.13 Crucially, the addition of only 821 units into the proposed housing supply would not deliver a 5-year supply of housing land upon adoption of the Plan, which is a pre-requisite to soundness.</p> <p>1.14 Based on the Sedgefield methodology, the 5 year requirement is 9,524 dwellings.</p> <p>1.15 The Main Modifications identify a 5 year housing supply of only 9,149 dwellings (See CD4a Schedule 1 as updated by the Council in September 2017). Accordingly, the Council has identified a supply of only 4.8 years and therefore the plan cannot be found sound on this basis.</p> <p>1.16 The Council's current position is untenable. It is plainly evident that the steps taken by the Council following the examination fall short of the Inspector's requirements and are insufficient to achieve a sound plan. The Council must take further steps to boost housing supply. Redcliffe Homes supports the identification of additional land for housing across the District. However, the suitability, deliverability and availability of a number of the new allocations is questionable for the reasons set out in the representations to Schedule 1 of the SAP.</p> <p>1.17 The Council has not exhausted all suitable sources of housing supply to inform the Main Modifications. The Council identified known sources of supply within CD2a (Sites within the Development Management Process as at 26 June 2017). Part 1 of CD2a identifies a total supply of 9,221 albeit 7,760 units are on Green Belt land. Discounting Green Belt sites and addressing issues of double-counting the residual supply is 1,268 dwellings. This supply added to the 1,812 dwellings identified to be</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>broadly in conformity with the Core Strategy (CD2a Part 2) produces a total potential supply of 3,080 dwellings. If a non-implementation discount of 20% is applied, the resultant supply is 2,464 dwellings. The Council should take a proactive approach to the assessment of all sources of supply within CD2a with the objective of boosting housing supply over the plan period and within the 5 year period in line with the Inspector's requirements. The Main Modifications are a product of a limited exercise which has failed to review the full potential of housing land within North Somerset.</p> <p>1.18 Whilst it is recognised that the Council will commence work on a new Local Plan in 2018 in line with the Joint Spatial Plan for West of England (JSP), this does not remove the need to fulfil its obligations under the Adopted Core Strategy through the SAP.</p> <p>1.19 The JSP is expected to impose a higher housing requirement upon North Somerset based on the latest OAN for the housing market area. The Government's indicative assessment of housing need for North Somerset (published 14 September 2017) is 1,305 dwellings (2006-2026), based on the proposed formula. This equates to a 24.4% increase in the housing need compared with the Core Strategy annualised requirement of 1,049 dwellings.</p> <p>1.20 If the Council adopts a proactive response to the requirements of ID4 and identifies an additional supply of around 2,500 dwellings, it would put itself in a strong position to meet its housing needs as identified by the JSP OAN or the Government's standardised formula. Based on the Government's current proposals, where a plan has been adopted in the last 5 years, such as North Somerset the new method should be used during the next review of the Plan, i.e. the JSP. In addition, under the duty-to-cooperate, the JSP will require neighbouring authorities to accommodate some of Bristol's housing needs. Accordingly, there is a strong likelihood that North Somerset's housing requirement through the JSP will exceed 1,305 dwellings per annum over the period 2016- 2036.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>AM35: Schedule 1, Birnbeck Pier</p> <p>1.21 Birnbeck Pier was identified through the Publication Version for allocation. However, the main modifications introduce substantial additional text to clarify the requirements of the allocation. Reference is made to the “<i>great weight</i>” which should be ascribed to the conservation of heritage assets, including listed buildings and the Birnbeck Conservation Area. Previously no reference was made to such heritage assets although this will have a significant influence upon the overall capacity of the site.</p> <p>1.22 The proposed additional text refers to “<i>landside development to ensure renovation of Birnbeck Pier</i>”. This implies that development will provide funding to enable the renovation of the Grade II* listed Pier. English Heritage (Historic England) published a note in June 2012 entitled “<i>Enabling Development and the Conservation of Significant Places</i>”. The note remains relevant to paragraph 140 of the NPPF. Paragraph 2.2 recognises that enabling development is by definition contrary to policy and therefore can have no place within local development frameworks other than to set out criteria against which such applications will be assessed. Paragraph 2.2.2 states that proposals to introduce site specific provision for enabling development in development plan documents should be resisted since the optimum uses, costs and values fluctuate over time. The case for enabling development can only be properly considered in the context of a specific application where a binding and enforceable link to its heritage objective can be a prerequisite to a grant of planning permission.</p> <p>1.23 In recognition of this advice from Historic England it would be inappropriate to use the principle of enabling development as justification for the identification of the allocation. Any reference in this regard should be removed from the policy, and if in so doing the basis for the allocation is undermined, it should be deleted from the Plan.</p> <p>MM8: Schedule 1 – Queensway/Midhaven Rise</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>1.24 The inclusion of Queensway/Midhaven Rise as an allocation for 35 dwellings follows the decision of the Executive on 5 September 2017 to allocate additional sites. The Executive Report noted that the Council has a landownership interest in the site. The site is currently occupied by a football club and whilst its occupation is subject to a short term lease, development of the site would be dependent on alternative pitch provision being secured in the locality.</p> <p>1.25 The individual site assessment for Queensway/Midhaven Rise submitted in August 2017 confirms that the occupying football club will need to be relocated and no alternative site has been secured or is known of at this time. The form also confirms that the site is not being actively promoted, there is no developer interest and the site is unlikely to be available until the period 2022-2026. On the basis that the site is not currently available for development it is not reasonable to include it within the 5-year period to 2022.</p> <p>MM9: Schedule 1 – Land at Wilson Gardens/Scot Elm Drive</p> <p>1.26 The inclusion of Land at Wilson Gardens/Scot Elm Drive for 51 dwellings follows the decision of the Executive on 5 September 2017 to allocate additional sites. The new text identifies the need for a Flood Risk Assessment, sequential and exception text to accompany any application. The site lies entirely within Flood Zone 3. Paragraph 101 of the NPPF steers new development to areas with the lowest probability of flooding through the sequential test. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The exception test follows if the sequential test confirms that the development cannot be located in an area at lower risk of flooding.</p> <p>1.27 The NPPF, paragraph 102, is clear that both the sequential and exception tests must be passed for development to be allocated or permitted. It is therefore not appropriate to</p>	




Respondent Name	Comment ID	Comment	Attached documents
		<p>allocate land for housing prior to the sequential and exception test being carried out. The National Planning Practice Guidance requires the sequential tests to be applied to the whole local planning authority area to increase the possibility of accommodating development which is not exposed to flood risk (Paragraph 020 Ref: ID:7-020-20140306). This process should be encompassed within the planmaking process.</p> <p>1.28 The Environment Agency’s Hearing Statement to Matter 1.4 of the SAP Examination confirms that the LPA undertook a Sequential Test however, this was restricted to areas identified as being in need of urban regeneration. The assertion clearly being that other areas with a lower probability of flooding are, not in fact, appropriate for urban regeneration. Since then the Council has allocated a number of new sites, many of which are not proposed to deliver urban regeneration and therefore fall outside the scope of the Sequential Test.</p> <p>1.29 In the absence of the outcome of a sequential and exception test for these sites, including MM9, it is inappropriate to allocate these sites. Other sites which are affected by the absence of a sequential and exception test are identified in subsequent representations.</p> <p>MM12: Schedule 1 – Court Farm, All Saints Lane, Clevedon</p> <p>1.30 MM12 represents a further site included within the plan through the Main Modifications by the Executive. The allocation requires an FRA, sequential and exception test to be carried out. As set out within our comments to MM9, the NPPF requires sequential and exception tests to be undertaken prior to allocation of land for development. Therefore it is inappropriate to allocate this site prior to assessment.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>1.31 In addition, the site lies immediately adjacent to Clevedon Court which comprises a Grade II* Historic Park and Garden, Grade I listed building and Grade II listed boundary wall along with a number of other listed buildings and structures. Limited consideration is given to the significance of the heritage assets within the proposed policy which states “<i>design must consider adjacent heritage assets</i>”. <i>No consideration has been given to the potential mitigation required to ensure development does not harm the setting of the listed buildings and therefore the site’s capacity cannot be assured.</i></p> <p>MM17: Schedule 1 – Harbour Road/Gordano Gate</p> <p>1.32 For the reasons set out in respect of MM9, the introduction of this new allocation for 93 dwellings is unsound prior to a sequential and exception test being carried out to confirm that there are no alternative sites in areas of lower flood risk.</p> <p>MM18: Schedule 1 - Land at Wyndham Way</p> <p>1.33 For the reasons set out in respect of MM9, the introduction of this new allocation for 35 dwellings is unsound prior to a sequential and exception test being carried out to confirm that there are no alternative sites in areas of lower flood risk.</p> <p>MM19: Schedule 1 – Site V2, Harbour Road, Portishead</p> <p>1.34 For the reasons set out in respect of MM9, the introduction of this new allocation for 10 dwellings is unsound prior to a sequential and exception test being carried out to confirm that there are no alternative sites in areas of lower flood risk.</p> <p>MM20: Schedule 1 – Land off Wrington Lane, Congresbury</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>1.35 The site benefits from outline planning permission. The proposed wording of the allocation includes “access to be confirmed through planning consent.” Notwithstanding the fact that the point of access has been confirmed by the extant planning permission, the proposed wording serves no useful purpose and should be deleted.</p> <p>MM25: Schedule 1 – Land at Cox’s Green, Wrington</p> <p>1.36 Land at Cox’s Green has been included within the plan as a new allocation following the decision of the Executive on 5 September 2017. The proposed allocation for 28 dwellings reflects the provisions of an outline planning application which was submitted to the Council in February 2017. There are no objections to the proposals from statutory consultees and the Council has confirmed the proposals comply with the Core Strategy. It is noteworthy that this represents the first residential allocation at Wrington through the SAP and represents only a 2% increase in dwelling stock at the service village. With the exception of Easton-in-Gordano/Pill and Long Ashton which have received no allocations to date, this represents the lowest increase in housing stock of the remaining service villages, as illustrated by the tables below.</p> <p>SEE ATTACHMENT FOR FULL TABLES</p> <p>1.37 A larger site for up to 59 dwellings, which includes the full extent of the allocation, was subject of a S.78 Inquiry in September 2017. The Inquiry opened on 26th September and closed on 3rd October 2017. The appellant, Redcliffe Homes, appealed in December 2016 against non-determination. The Council confirmed its putative reasons for refusal in July 2017 as follows: “The proposed erection of up to 59 new dwellings on agricultural land represents a form of development that fails to respect the character of the settlement, will be out of keeping with the rural landscape character and quality of the area and will result in harm to the rural setting and edge of the village.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>The proposal is therefore contrary to Policies CS5, CS112, CS14 and CS32 of the Core Strategy and Policies DM10 and DM32 of the Sites and Policies Plan Part 1.”</p> <p>1.38 At the Inquiry the Council accepted that it proposed to allocate land through MM25 for residential development and the current planning application would be reported to the Regulatory and Planning Committee by November 2017 with a recommendation to approve. On day 4 of the inquiry, the Council formally withdrew its case to the appeal. The inquiry continued to hear the appellants’ evidence which was cross-examined by the Rule 6 party, the Wrington Village Alliance. The Inspector has indicated that his decision will be issued by 23 November 2017.</p> <p>1.39 Following the inquiry the Council has advised that it will await the outcome of the appeal before determining the 28 dwelling scheme.</p> <p>1.40 Redcliffe Homes supports the principle of allocation at Cox’s Green. However, objection is raised to the scale of the allocation which fails to recognise the full potential of the land south of Cox’s Green to accommodate housing. As outlined above, the Council has confirmed that it has no outstanding objection to the proposals for up to 59 dwellings. There are no statutory consultee objections to the proposals.</p> <p>1.41 In light of the Council’s latest position and the ongoing imperative to boost housing supply within North Somerset, the capacity of the proposed allocation should be amended to allow for 59 dwellings. The site boundary on the policies map should be amended accordingly. A site location plan for the 59 unit scheme is attached for reference.</p> <p>1.42 In addition, objection is raised to the proposed wording of the allocation. In particular, the policy states “vehicular access off Hayvatt Road”. There is no basis for</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>stipulating a particular access point. The outline planning application for 59 dwellings includes vehicular access from Hayvatt Road and from Cox's Green.</p> <p>1.43 The proposed policy states that “design/layout to minimise visual impact of the scheme.” Any proposals would need to comply with the adopted development plan, including the provisions of Policy CS32 of the Core Strategy and Policy DM32 of the Sites and Policies Plan. Policy CS32 requires all new development within or adjoining service villages <i>“to result in a form, design and scale of development which is high quality, respects and enhances the local character, contributes to place-making and the reinforcement of local distinctiveness, and can be readily assimilated into the village.”</i></p> <p>1.44 Policy DM32 encourages high quality design of buildings and places. Its provisions include consideration of whether the proposals respect the characteristics of the site and surrounding and are appropriate to its use and position within the landscape and/or townscape.</p> <p>1.45 The provisions of these policies are sufficient to ensure that the design and layout would respect the visual impact without the need for express reference within the site specific policy.</p> <p>1.46 The policy requires the <i>“retention of existing hedgerows.”</i> However, the outline planning applications both involve the translocation and removal of hedgerows along the boundaries within the public highway to enable vehicular access and visibility. Indeed, it is an essential component of any scheme to achieve vehicular access. The proposals have been accepted by the Council through the planning application and appeal. It is therefore recommended that reference to hedgerow retention is deleted from the policy.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>1.47 The draft policy states that <i>“open space requirements will be fixed through planning application.” There is no basis for a specific reference to open space provision within MM25. Policy DM70 of the Sites and Policies Plan requires the design and implementation of development infrastructure, including play areas and green infrastructure as part of development proposals. These policy provisions are sufficient to ensure the site delivers open space in accordance with the Adopted Development Plan.</i></p> <p>1.48 Subject to the above amendments to MM25, Redcliffe Homes supports the allocation of land at Cox’s Green, Wrigton for residential development for 59 dwellings.</p> <p>SEE ATTACHMENT FOR LOCATION PLAN</p>	
Sutherland Property & Legal Services Ltd	17824385//2	<p>Response on behalf of Sanders – Land at Bleadon</p> <p>Summary</p> <ul style="list-style-type: none"> • The LPA have failed to address the lack of housing supply in accordance with the inspector request • The LPA have failed to assess sites that were within the Inspector remit without cause • The LPA failed to assess sustainability of Bleadon as a village for growth and have erred factually in their RAG assessment of the village 	<p> Letter to NSC 18.10.17.docx (505 KB)</p> <p> Emails AS - MR - GQ (3 pages).pdf (704 KB)</p> <p> Emails AS - RK - GQ (4 pages).pdf (1014 KB)</p>

Respondent Name	Comment ID	Comment	Attached documents
		<ul style="list-style-type: none"> <li data-bbox="613 328 1563 427">• The LPA have failed to assess our site despite an assessment template being completed and submitted and the site falling within the remit of the review requested by the inspector <p data-bbox="539 467 824 496"><u>Housing Deliverability</u></p> <p data-bbox="539 536 1574 951">The deliverability of the plan rests upon the ability of North Somerset Council to prove that at least a 5-year housing land supply can be achieved. This requires a robust approach to site selection and a realistic delivery trajectory for those sites. We do not consider that the Council has achieved this objective and consider that Service Villages and In-fill Villages can play a much wider role in achieving the plan’s objectives to deliver housing. It is concerning that the Local Planning Authority cannot demonstrate a 5-year supply of housing land and that the revised Site Allocation Plan draft for consultation still fails to address the 5-year housing land supply. The Council should be making every effort possible to ensure that the Site Allocations Plan identifies sufficient sites with a suitable degree of flexibility to guarantee that the housing requirement is met or exceeded. It is not accepted that the current iteration of the Site Allocation Plan achieves this.</p> <p data-bbox="539 991 1568 1270">We consider that North Somerset Council are overly optimistic in their rates of delivery given the significant under delivery in the past and a 20% buffer should be applied. It should also be noted that North Somerset Council have proposed allocations that are focused onto Weston-Super-Mare as opposed to surrounding Villages and Towns. However, Weston-Super-Mare has struggled to deliver housing growth and the large number of units proposed are bound to lead to issues of market saturation with over 6500 dwellings proposed on two large-scale urban extensions within Weston-Super-Mare.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>We do not accept that the Local Planning Authority approach to the Inspector’s requirement to identify additional housing land supply has been accurately or appropriately carried out. Our reasons for asserting this are as follows;</p> <p><u>1. Omission Sites</u></p> <p>We are aware that the Inspector did not invite comments on omission sites within the Inquiry process. Our site had been categorised as an omission site by the Local Planning Authority when it should not have been. However, even if it were previously characterised as an omission site, the direction by the Inspector to reconsider options for land supply meant that the site should be reconsidered and assessed.</p> <p>Following the Inquiry in May, the Inspector set out at paragraph 24 of her letter to the Local Planning Authority that three sources should be tested in relation to achieving the additional housing land supply necessary to make the plan sound. These three sources were;</p> <ol style="list-style-type: none"> 1. Sites broadly consistent with the Core Strategy Spacial Strategy. 2. Sites considered through the SAP Examination Process. 3. Sites which are in the “development pipeline”. <p>However, North Somerset Council appear to have attached unacceptable restrictions to their interpretation of the Inspector’s request. Despite sites being put forward which are broadly consistent with the Core Strategy, these sites were not tested if they were not subject to a formal pre-application process or application to the Council prior to the Inquiry Letter. In-fill Villages or countryside sites were not assessed regardless of sustainability. This fails to consider opportunities for the promotion of appropriate housing supply land in these areas.</p>	

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		<p>Paragraph 2 of the Local Planning Authority letter to the Inspectorate sets out the restrictions the Council placed upon their interpretation of her guidance. Given that the Local Planning Authority have only identified 821 additional dwelling sites when the guidance given was to achieve up to 2500 additional units to meet housing land supply requirements, it is surprising that North Somerset Council has chosen to fail to consider, assess and identify such sites.</p> <p>Further guidance is set out in the Planning Advisory Service Good Plan-Making Guide. It says ‘a successful plan will make clear what development is going to be delivered and when, where and how,’ and that ‘many soundness problems arise from a failure to properly answer the critical questions of when, where and how development will be delivered.’ Paragraph 2.5 of the guide encourages a single plan approach and that ‘delaying addressing critical issues by the promise of preparation of later development plan documents without proper justification is a dangerous approach.’ This is an important consideration here, where the Site Allocations Plan is itself the last document which will comprise the North Somerset Local Plan and so is the last chance to demonstrate that needs will be met and the whole Local Plan is sound.</p> <p>We have been promoting a site in Bleadon Village which can deliver up to 250 additional dwellings along with community facilities, highways improvements and contributions to increase sustainability for the growth of Bleadon Village as a whole (see site location plan appended). We have assessed the site against the criteria set out by NSC in their further search for sites. We consider it should have been assessed and set out below why. Indeed, a complaint was raised with the Council in respect of their failure to assess the site which has not been resolved by the Council.</p> <p>1.1 Source 1</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="539 328 1541 427">It is inappropriate for the Local Planning Authority to attempt to state sites outside of WSM and Service villages will be addressed subject to a Joint Spacial Plan with detailed allocations when that plan has not even begun the drafting process.</p> <p data-bbox="539 467 1563 1058">Our site, being immediately adjacent to the Village and creating appropriate growth in sustainability as well as being the subject of community engagement should have been considered by the Local Planning Authority under the first source of identifying land supply. It is important to recognise that the village of Bleadon is growing through existing consents without delivering the sustainability required for managed future growth. Our Site proposes mixed development that will enhance and improve the facilities and services in the village as well as achieving growth in housing land supply. It is in accordance with sustainable development principles and broadly in line with the Spacial Strategy when the errors of the Council in reviewing village sustainability are considered. Sustainable development that accords with CS28, CS31, CS32 and CS33 is allowed outside of settlement boundaries and this is consistent with the NPPF, which has a presumption in favour of sustainable development. Policy CS33 is the relevant policy here. Allocation of sites and the RAG score has no bearing on the allocation of sites as the aforementioned site, The Quarry, has been allocated and approved under CS33, despite the Village scoring low. Indeed when a comparison is made between allocated development and village RAG scores there are no seeming links between them.</p> <p data-bbox="539 1098 696 1126">1.2 Source 2</p> <p data-bbox="539 1238 1547 1337">The second source states that it will address sites identified through the examination process provided they have also been demonstrated to be deliverable. Our site was identified through the examination process and was put forward to the Local Planning</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Authority within that process but was not included within the original draft of the allocation plan. We attended the Inquiry and our site was put to the inspector. However, North Somerset Council have failed to assess the site despite it being considered to be deliverable by the land-owning developers. Copies of the correspondence provided by the Local Planning Authority denying that the scheme was suitable for consideration are attached.</p> <p>1.3 Source 3</p> <p>In relation to source three, North Somerset Council refers to “<i>Sites which are in the development pipeline</i>” and this seems to be a catch all approach given that this is referred to in both of the first two land supply sources. It refers to all sites which have been submitted to the development management process (primarily pre-application advice or applications). However, despite the fact that our site had been promoted to the Local Planning Authority and informal pre-application advice sought from them, the Local Planning Authority failed to assess our site.</p> <p>When it was brought to their attention, the Council failed to recognise that it could be categorised as falling within any of the three sources and refused to assess it. Accordingly, we cannot agree with the Local Planning Authority in their letter to the Inspector referred to as the “<i>Interim Response to Inspector’s Letter CD4</i>” as it is quite clear that North Somerset Council has not assessed our site which falls clearly within the scope of the Inspector’s request.</p> <p>Although North Somerset Council did not provide an assessment form in relation to this site as set out at their paragraph 4 in CD4, as local development Agents, we were supplied with the template in relation to other sites already with the Local Planning Authority as submitted and extant planning applications. Accordingly, we utilised the template to submit the site for assessment. We received no response from the Local</p>	

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		<p>Planning Authority as to their intention to not assess the land until such time as we were made aware of the second draft being sent to the Executive Committee for approval for public consultation. At that stage, it became clear that the site was not going to be considered appropriate for assessment despite the fact it meets the criteria given in the undertaking to the Inspectorate. A complaint was made but not resolved.</p> <p><u>2. Bleadon Sustainability</u></p> <p>We cannot agree with the Council categorisation of Bleadon as an unsustainable location for growth and the Council view that the village should not host development. Not only have schemes within the village been approved upon appeal recently in the village but there are now a range of applications exceeding 10 units which may be approved without any community facilities being delivered.</p> <p>The council failed to respond or investigate errors in relation to their assessment of Bleadon raised by us and the Inspector in the SAP inquiry and consultation process and continue to do so. We set out below the points made then that have not been responded to and which demonstrate the Council erred in their response to the inspector;</p> <p><i>“In LPA doc CS2, the LPA comments in relation to the Inspectors queries as to Bleadon sustainability that;</i></p> <p><i>Bleadon is an infill village and site allocations are a reflection of the classification as an infill village within the Core Strategy settlement hierarchy. When the assessment was carried out, it was judged that Bleadon did have fewer job opportunities. It should be noted that the information provided within the assessment was verified by Parish Councils and was subsequently subject to two rounds of public consultation. No previous comments were received with regards to Bleadon to warrant any re-assessment.</i></p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p><i>We disagree with this statement and would refer the inspector to the fact that representations were made by R Burrows which significantly queried the LPA findings and which do not appear to have been considered or responded to. No evidence supporting the assessment is provided other than reference to having asked the PC to confirm assumptions made. On the contrary there is significant evidence from Mr Burrows and recent planning applications which do not support the LPA statement as to the sustainability of the Village. In addition, as set out above, the LPA have failed to consider the potential arising from already permitted schemes as to the revised needs and sustainability of the village.”</i></p> <p>The RAG Assessment for Bleadon Village carried out by the Local Planning Authority to inform the first draft SAP is inappropriate and incorrect and we set out below our challenge to the assessment undertaken.</p> <p>The RAG states clearly that there are very few job opportunities within the Village and the lack of a school leads to a lack of sustainability. However, there are in excess of 53 businesses operating within the Village of Bleadon including a range of companies and facilities. The recently approved application at the Regional Wake Park Leisure facility (specialist water sports facility) will bring additional jobs and leisure opportunities as will the large-scale holiday park approved on Accommodation Road (15/P/2304/F). There have been significant recent upgrades to Purn Holiday Park and outstanding applications for additional development for the Village.</p> <p>There is not a school in the Village and there are at present in excess of 50 children without access to local education who are bussed to up to 14 different schools. However, during our community engagement processes prior to submission of our application where we proposed a school, it became clear that Village residents do not wish to see a school. Local feedback was negative because it will constrain the community to the use of North Somerset Council secondary schools whereas they</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>currently have access to the schools within Somerset from the Village. Public perception is that the schools in Somerset are considerably better than those accessible in North Somerset and accordingly, parents do not want to see a school in the Village.</p> <p>In relation to the RAG Assessment, the Local Planning Authority state in relation to the economic dimension that;</p> <p><i>“There are few services provided within the Village, no health care, leisure or supermarket shopping facilities and the nearest store is around 4km away. There is a Post Office.”</i></p> <p>This is of course incorrect as there is a Post Office, a Village Store and a Café as well as the employment, workshop and office uses at the converted Purn Farm Industrial Estate. In addition, there is the quarry and that provides local employment opportunity. In relation to health care, Bleadon is closer to the WSM general hospital than many areas of WSM itself as the hospital is less than 2k from the village providing a full range of NHS health care. The regional water-sports park also seems to have been overlooked as a leisure facility as have the local riding stables. The Village has three public houses all of which offer food as well as an Indian Restaurant and the aforementioned services.</p> <p>There is considerable evidence from the local community that they require additional retail opportunity as the existing Post Office/Village Store does not open evenings and accessibility of retail offerings for extended periods is desirable. In addition, the community seek a health care centre / doctors surgery. These will not be delivered unless enabling housing development or allocation is made.</p> <p>Key issues for the local community were highways safety on the A370 and the lack of appropriate crossing points to utilise public transport as well as the history of significant traffic accident and death. Improvements were tabled but not funded by the Council</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>highways team and will not come forward without funding or enabling development.</p> <p>Our proposal creates improved highway access for the whole Village implementing pedestrian crossing and junction to the A370 reducing speed and increasing safety for all Villagers. In addition, our site provides a health centre which it is proposed will include a Doctor's Surgery as well as alternative health practitioners.</p> <p>Our proposal would address all of the matters that lead the Local Planning Authority to consider the Village inappropriate for further growth. It is not understood why the Local Planning Authority have determined that Bleadon is inappropriate for development growth. However, given that they have incorrectly assessed the Village and failed to identify several key service provisions already in existence as well as those proposed and approved recently, the error may be understood if the LPA were to reconsider or review the errors. They have not despite the clear evidence put to them.</p> <p>The Local Planning Authority state that <i>"the nearest rail station is approximately 5km away in Weston-Super-Mare and there is an hourly bus service to the Town but only a quarter of people use sustainable travel means for work."</i></p> <p>This is also incorrect, there are two bus services; the 4/4A which is hourly and the 20 which runs along the A370. However, given the fact that the A370 highway has no pedestrian crossings to allow residents of the Village to access the bus services safely and appropriately, it is not surprising that they are under used. During community consultation it was quite clear that the Parish Council seek increases in the bus services and increased public safety in order to allow appropriate increase in those uses.</p>	

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		<p>The Village is close to Weston-Super-Mare where services are achievable quickly and easily and indeed, access to the hospital, the sea front, the major shopping centre of Weston-Super-Mare are all within a 20-minute walk or 5-minute bus ride.</p> <p>The RAG also refers to environmental sensitivity due to</p> <p><i>“flood risk and proximity to environmentally designated areas (AONB)”</i>.</p> <p>The Village is not within the AONB, which forms part of the backdrop landscape within which the Village is set with the hillside behind the Village benefiting from the designation. Other development within the Village has been approved on appeal with an Inspector considering that housing scheme (within the AONB) could be appropriately landscaped to avoid adverse impact on the AONB. Landscape architectural support demonstrates that a scheme as proposed on the site put forward would be better siting than any other residential development proposed within the Village in order to avoid adverse impact on the AONB.</p> <p>Further, although there are areas of flood risk to the south of the A370, the site is in Flood Zone 2 and can be suitably managed in terms of flood risk. Much of the Village is not within a high flood risk area and accordingly the Local Planning Authority assessment is both incorrect and inappropriately interpreted. The Inspector will be aware that much of the allocated development land falls within higher flood risk zones than the village and our site in particular.</p> <p>Housing assessment - deliverability</p> <p>It is understood that the LPA still rely on the outline consent for 42 dwellings approved at Bleadon Quarry when we and villagers are fully aware the site is not going to be</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>developed because the relocation of the enterprise to a quarry in Wales did not take place as expected.</p> <p>The only allocated site near the village is in Uphill and despite it being less sustainable has been allocated simply because an application was already submitted.</p> <p>Our scheme will be submitted in November with every intention of early delivery having been through several rounds of public consultation, amendment and consultation with statutory authorities.</p> <p>It is naive at best to expect the village of Bleadon to have no development whatsoever for any purpose given the history of development apparent from recent applications for leisure and economic / tourism uses and the obvious sustainability of the area with its geographical proximity to towns and services.</p> <p>Please refer to Appendix 1 to the SAP which details the assessment of a site within Bleadon village that was not allocated. You will note that in the RAG the Council assert a lack of jobs and an adverse impact on landscape AONB yet in their assessment of this site within the village, they conclude the opposite (and erroneously fail to identify leisure and pedestrian linkage). There is no consistency of application or understanding of the assessment criteria displayed. The criteria for sites put forward for residential development where the Local Planning Authority have assessed Bleadon for context on our comments in relation to that assessment is also attached.</p>	
Trustees of SSE	17890657//1	The Council has failed to address the matters raised in the Inspector's letter dated 26 June 2017, specifically in identifying an insufficient number of sites for additional dwellings.	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Notwithstanding that the Core Strategy fails to provide for a review of the Green Belt, the increase in the requirement for new houses means we consider that small scale release of land from the Green Belt for housing in sustainable locations is justified. We own land at Tower Farm, south of Tower Road in Portishead, which we consider to provide a sustainable location for development. The site has the capacity to deliver up to c. 500 homes and was included in the Council's Call for Sites in February 2017.</p>	
rowland richardson	17895713//1	<p>The documentation only considered planning as applications and the thirst to achieve housing numbers set by the government</p> <p>It does not consider planning holistically, urban planning , impact on infrastructure or forward planning prior to granting housing applications</p> <p>we are simply devouring our countryside / building outside village boundaries in some cases and ignoring that many of the applications will have an impact on our country side and way of life</p> <p>Where is the plan to create 25000 new jobs ?</p> <p>the traffic impact of these developments will choke our already choking roads /trains that run on diesel and are 50 years plus old when the vast majority of people must commute for work</p> <p>We should focus on infrastructure, employment and urban planning</p> <p>I have been to many seminars and read studies re urban growth all over the world - ours is the least strategic</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>we must focus on brown field sites/ strategic urban planning/ invest in infrastructure prior to granting planning - we need to rejuvenate Weston town centre and create affordable housing for a mixed diversity of age groups and push back at government to invest in infrastructure not just push arbitrary reactive housing numbers at councils to achieve at any cost</p> <p>perfect example - I have been hearing about the Banwell Bypass as a child / sit in half an hour to 40 minutes of traffic each way every working day and I am almost 50 years old ? but instead the plan is build another 3000 houses and join villages together ?</p> <p>if you want people to comment or add good ideas please attach the strategic urban planning, infrastructure and employment studies that should go with these documents</p>	
Blue Cedar Homes	17917729//1	<p>LAND AT RUSHMOOR LANE, BACKWELL</p> <p>Objections are lodged to the lack of residential sites being identified in Backwell. It is unclear why no sites have been identified within this settlement which is a Service Village under Policy CS32 of the Core Strategy. Under that policy new development within or adjoining the settlement boundary of the settlement will be supported provided that a number of criteria are met. Furthermore, the emerging JSP identifies Backwell as a preferred location for strategic development. This again reinforces its status as a sustainable settlement for additional development.</p> <p>Land at Rushmoor Lane, Backwell (controlled by Blue Cedar Homes) is ideally placed to be allocated for a retirement led residential scheme. The site is ideally placed for such a development and the following comments are particularly pertinent: -</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<ol style="list-style-type: none"> 1. The form, design and scale of any development on the site would respect and enhance the local character of the area; 2. The proposals would meet an identified need for residential accommodation in the settlement namely elderly person's accommodation. At present no sites for such accommodation are being identified; 3. The development would have no detrimental impact on services and infrastructure; 4. The proposals would not have a detrimental impact on the landscape character or setting of the area; 5. The development would not have a detrimental impact on highways; 6. The site is a sustainable location and would minimise travel to facilities; and 7. The site is accessible to facilities by walking etc. <p>In view of the above, the site is eminently suitable and should be allocated for a retirement led residential development.</p>	
Progress Land (Sandford) Ltd	17919169//1	<p>I am writing on behalf of my client, Progress Land (Sandford) Ltd, in respect of the consultation on the Proposed Main Modifications to the Site Allocations Plan. This representation covers the following matters:</p> <ol style="list-style-type: none"> 1. The LPA's decision not to undertake the work requested in the note from the Inspector following the closure of hearings on 18th May 2017. 2. The LPA's approach to identifying potential new housing allocations. <p>1. The LPA's decision not to undertake the work requested in the note from the Inspector following the closure of hearings on 18th May 2017.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>At paragraph 22 of the note issued on 18th May 2017 (ID4) following the closure of hearings the Inspector states:</p> <p><i>“I consider that the Council should test the potential for the provision of up to 2,500 additional houses in order to identify the environmental costs of allocating a wider choice of housing sites. Furthermore, where new allocations are to be made, there is a need to identify and allocate sites which can be made available for development at an early date to help meet the five year supply as well as secure the overall delivery of the housing requirement by 2026.”</i></p> <p>The instructions from the Inspector were clear and unambiguous. We were therefore extremely disappointed to note from the LPA’s interim response (CD2) to the Inspector that they decided not to undertake the work that was requested.</p> <p>Firstly, at paragraphs 7 to 16 of CD2 the LPA attempt to reopen discussion on the figure of 2,500 dwellings and make the case for a lower figure. This is inappropriate as it is not within the scope of work requested by the Inspector, and is clearly an attempt to row back on what was agreed during the hearing sessions.</p> <p>Secondly, the LPA has not tested the <i>“potential for the provision of up to 2,500 additional houses”</i>. Even if all of the 28 sites on which the LPA sought comments on in August had been deliverable by 2026, they would have only delivered a total of 1,812 dwellings. This falls significantly short of the figure of 2,500 dwellings that the LPA was asked to test.</p> <p>2. The LPA’s approach to identifying potential new housing allocations</p> <p>The key reason that the LPA was unable to identify sufficient sites to meet the 2,500 dwelling requirement is the methodology that they have used, specifically:</p>	


Respondent Name	Comment ID	Comment	Attached documents
		<p>1. The LPA has decided to exclude sites where an application or pre-application request was not submitted before 18th May 2017.</p> <p>2. The LPA has decided to exclude any sites that do not fully comply with the Core Strategy. Despite the Inspector noting at paragraph 23 of ID4 that:</p> <p><i>"A further potential constraint to the identification of additional allocations is the distribution of housing identified in Policy CS14. However, CS14 refers to the "broad distribution of new dwellings" which indicates that the net additional dwellings listed in the policy do not constitute a straight jacket to be achieved, and that there is some flexibility for the distribution of housing provision within the settlement hierarchy in the CS."</i></p> <p>This methodology has resulted in the LPA discarding a number of sites that could enable them to achieve the 2,500 dwelling requirement. One of these sites is the Land North of Greenhill Road, Sandford. An outline planning application for up to 93 dwellings has been submitted for the site (Ref: 17/P/0887/O) and has yet to be determined. While it is acknowledged that the application is not wholly in accordance with the Development Plan as the majority of the application site falls outside the settlement boundary for Sandford (an Infill Village), the application documents demonstrate that:</p> <ul style="list-style-type: none"> • The site is in a highly sustainable location, directly adjacent to Sandford Primary School and within walking distance of the local convenience store (Sandford Village Stores). It is also well served by public transport, with the two nearby bus stops (located in front of the school) providing access to both Weston-super-Mare and Bristol. • There are no technical constraints that would preclude development. 	

Respondent Name	Comment ID	Comment	Attached documents
		<ul style="list-style-type: none"> • A high quality development of around 93 dwellings could be delivered within the next 5 years. <p>Furthermore, the LPA has have been inconsistent in their approach when deciding which sites they consider to be broadly consistent with the Core Strategy spatial strategy. For example, a site at Station Road, Sandford (Main Modification 29) is now being proposed as an allocation for 16 dwellings. The site is approximately 350 metres from the settlement boundary from Sandford. In contrast, the Land North of Greenhill Road is directly adjacent to the settlement boundary (part of the site is within the boundary), but has been excluded from consideration on the basis that it is not broadly consistent with the Core Strategy spatial strategy</p> <p>Conclusions and Recommendations</p> <p>The Proposed Modifications are insufficient to make the Site Allocations Plan sound. Specifically, the Plan has not been 'positively prepared' and is not 'justified', two of the tests of soundness set out at paragraph 182 of the NPPF.</p> <p>In order to avoid address this issue I strongly urge the Inspector to pause examination and advise the LPA that they need to undertake a more thorough site assessment process that identifies sufficient sites to address the significant shortfall in the LPA's 5 year housing land supply, and ensure that they meet their overall housing requirement for the plan period.</p> <p>Finally, please note that I would like to appear at any future hearing sessions on the Site Allocations Plan.</p>	

Respondent Name	Comment ID	Comment	Attached documents
Tesco Stores Ltd	17920129//2	<p data-bbox="539 328 1585 424">Please find below my representations submitted in respect of the current consultation on the main modifications to the Site Allocations Plan on behalf of my clients Tesco Stores Ltd.</p> <p data-bbox="539 536 1211 560"><u>Residential Modifications/Assessment of further Sites</u></p> <p data-bbox="539 671 1585 1158">It is also of concern that in respect of the site adjacent to the existing Tesco store at 173-175 Kenn Road Clevedon that the authority has considered after assessment not to accept its significant merits for a residential allocation. The Council's assessment rightly acknowledges that the site is sustainably located with good links to existing services and scores highly in all regards bar three namely the sites proximity to a railway station (2-5km) and the settlement wide issues of flood risk and proximity to open space the fourth issue relating to access to a pedestrian link would be easily resolved. Again, it has to be emphasised that in all other assessment criteria the site achieved the highest (green) classification and of those three elements it did not score as high on the issues relate to settlement wide issues that all sites within Clevedon could not score well on – for example of the 7 sites now carried forward for allocation within Clevedon not previously benefitting from a planning permission 5 require flood risk/ sequential test assessments to be undertaken prior to development and the other 2 only avoid this requirement because they comprise conversions of existing buildings.</p> <p data-bbox="539 1270 1585 1334">Of the 9 sites identified within the settlement boundary 5 stand at a greater distance from the town centre than the site adjacent to Kenn Road, 2 require infra-structure to</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>manage surface water and the maintenance of water courses (Yeolands Farm & Churchill Avenue), 1 has to consider potential heritage impacts (Bay Road), another has to consider Heritage impacts, the openness and setting of the greenbelt and wildlife considerations (Court Farm).</p> <p>In respect of the assessments of the (now promoted) Clevedon Sites we would make the following more specific comments:-</p> <p><u>Court Farm</u></p> <p>It is of concern that assessment of Court Farm does not identify the heritage asset issue but the mark up copy schedule of sites does and the assessment identifies the wildlife consideration as an amber but is highlighted in Green and despite Court Farm being located relatively closely to Kenn Road (and definitely within the same settlement it achieves a green assessment in relation to access to public open space whereas Kenn Road was assessed as Amber.. Again, in respect of Court Farm's impact on the general landscape or townscape (objective 4.3) the site is assessed as green (unlikely to have any impact) but the schedule identifies it as one where consideration has to be given to the setting of the greenbelt. There appears to have been significant and worrying discrepancies in the assessment and reporting of this site, a site which even before the inconsistencies are considered scores less well than the Kenn Road site.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="539 325 748 352"><u>Waverley House</u></p> <p data-bbox="539 464 1563 528">Scores very similarly to Kenn Road but is assessed as being at medium risk of flooding from surface water whereas Kenn Road is assessed at low or very low risk.</p> <p data-bbox="539 635 665 662"><u>Bay Road</u></p> <p data-bbox="539 770 1570 871">Scores very similarly to Kenn Road but is assessed as being Red (over 5km) in terms of proximity to a rail station whereas Kenn Road is Amber (2-5km). Bay Road scores Amber in respect of proximity to a leisure centre compared to Green for Kenn Road.</p> <p data-bbox="539 978 685 1005"><u>Kenn Road</u></p> <p data-bbox="539 1114 1565 1321">The issue identified by officers in respect of the potential proximity of the Tesco store service yard is a matter which could readily be overcome through the design process and the usual development planning management tools whereas the current situation i.e. the location of an employment/light industrial premises in very close proximity to existing residential receptors is now beyond the Councils control. The matter of pedestrian access too can be readily resolved through the design and planning process</p>	

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		<p>and as discussed above the issue of flood risk is settlement wide and affects all ‘new build’ sites now allocated by the Council in Clevedon and unlike at least two of the other sites now allocated Kenn Road does not have an identified surface water drainage issue to address.</p> <p>When viewed in the round it would appear that some of the appraisals and therefore the subsequent reporting of certain sites to the Council’s Executive Committee was flawed. This effectively undermines the evidence base for the subsequent allocation of sites within the settlement of Clevedon (and indeed the emerging Local Plan) and we would suggest that the sites be reviewed again to protect the integrity of the emerging plan and to allow allocations to be based on merit and that accordingly the site at 173-175 Kenn Road be allocated for residential development ahead of other less sustainable locations.</p>	
St Congar Community Co-housing Ltd	17920193//1	<p>SITE ALLOCATIONS PLAN EXAMINATION: FURTHER RESIDENTIAL SITE ASSESSMENTS</p> <p>I am writing on behalf of our client, St Congar Community Cohousing Limited, in respect of the consultation on the Proposed Main Modifications to the Site Allocations Plan. This representation covers the following matters:</p> <ol style="list-style-type: none"> 1. The LPA’s decision not to undertake the work requested in the note from the Inspector following the closure of hearings on 18th May 2017. 	<p> St Congar Cohousing Reps on Proposed Main Mods to SAC 27.10.17 WITH APPENDICES.pdf (5.1 MB)</p>

Respondent Name	Comment ID	Comment	Attached documents
		<p>2. The LPA’s approach to identifying potential new housing allocations, with specific reference to Land off Station Road Congresbury</p> <p>1. The LPA’s decision not to undertake the work requested in the note from the Inspector following the closure of hearings on 18th May 2017.</p> <p>At paragraph 22 of the note issued on 18th May 2017 (ID4) following the closure of hearings the Inspector states:</p> <p><i>“I consider that the Council should test the potential for the provision of up to 2,500 additional houses in order to identify the environmental costs of allocating a wider choice of housing sites. Furthermore, where new allocations are to be made, there is a need to identify and allocate sites which can be made available for development at an early date to help meet the five year supply as well as secure the overall delivery of the housing requirement by 2026.”</i></p> <p>The instructions from the Inspector were clear and unambiguous. We were therefore extremely disappointed to note from the LPA’s interim response (CD2) to the Inspector that they decided not to undertake the work that was requested.</p> <p>Firstly, at paragraphs 7 to 16 of CD2 the LPA attempt to reopen discussion on the figure of 2,500 dwellings and make the case for a lower figure. This is inappropriate as it is not within the scope of work requested by the Inspector, and is clearly an attempt to row back on what was agreed during the hearing sessions.</p> <p>Secondly, the LPA has not tested the <i>“potential for the provision of up to 2,500 additional houses”</i>. Even if all of the 28 sites on which the LPA sought comments on in August had been deliverable by 2026, they would have only delivered a total of 1,812</p>	


Respondent Name	Comment ID	Comment	Attached documents
		<p>dwelling. This falls significantly short of the figure of 2,500 dwellings that the LPA was asked to test.</p> <p>2. The LPA's approach to identifying potential new housing allocations</p> <p>The key reason that the LPA was unable to identify sufficient sites to meet the 2,500 dwelling requirement is the methodology that they have used, specifically:</p> <ol style="list-style-type: none"> 1. The LPA has decided to exclude sites where an application or pre-application request was not submitted before 18th May 2017. 2. The LPA has decided to exclude any sites that do not fully comply with the Core Strategy or where, in the case of Land off Station Road, Congresbury, it claims that insufficient information is available to support an allocation. <p>This methodology has resulted in the LPA discarding a number of sites that could enable them to achieve the 2,500 dwellings requirement.</p> <p>Land off Station Road, Congresbury was included in the list of potential allocations that was considered at the Executive Council meeting on 5th September 2017, but it was discounted 'due to constraints in relation to heritage issues on the site'.</p> <p>We understand that there is no dispute that our client's site - within/at the edge of a Service Village - is in broad conformity with the Core Strategy framework. It is therefore an appropriate location for housing development.</p> <p>Our client has submitted a considerable amount of information in support of its pre-application consultation on the cohousing proposals for the site (ref.17/P/0763/PRE), which is set out in the detailed planning letter dated 28th March 2017, attached as</p>	

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		<p>Appendix 1. This includes a Built Heritage Statement which assesses the impacts of the scheme on heritage assets, including the Grade 1 listed Vicarage and Refectory on the site. This has prompted a response from Historic England dated 31st May 2017 which is attached as Appendix 2. It will be seen from this letter that Historic England are broadly supportive of the principle of the development and are content to see the proposals progress.</p> <p>Specifically, in their recommendation:</p> <p><i>We recognise the potential for this cohousing project to deliver attractive housing in a sensitive setting and consider that the Glebelands and the Prayer Garden/Orchard development will have a less than substantial adverse impact on the setting of the highly graded heritage assets. Refurbishment of the Vicarage and Refectory offer the opportunity to enhance and preserve the listed buildings with consequential benefits to the setting of St Andrew's Church.'</i></p> <p>Historic England's comments in respect of the Glebelands part of the site are noteworthy:</p> <p><i>'In particular the family housing proposed for the Glebelands area are an attractive, contemporary take on terraced housing and provide external communal areas that will be of benefit to residents and allow for landscaping that will assist in embedding the development in its semi-rural context.'</i></p> <p>Since meeting with the LPA at the site, our client has further refined the proposals for the site, and has submitted additional justification for the scheme and a revised Concept Layout drawing which addresses concerns about elements of the proposals in the vicinity of the Vicarage and Refectory. For instance, 'copper cube dwellings' proposed in the Vicarage Gardens have been omitted. The letter setting out this additional</p>	

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		<p>justification dated 27th July 2017 and the Concept Layout drawing are attached as appendix 3, Unfortunately we have had no response from the LPA on this information to date.</p> <p>However, it will be seen from the Concept Layout drawing that the proposed housing (20 units) will be concentrated on the Glebelands part of the site, which is supported by Historic England. Furthermore, the proposals were discussed at a meeting of the Congresbury Parish Council Planning Committee on 21st August 2017. The Minutes record that: <i>'The parish council is in agreement with the proposals for the Glebelands'</i>.</p> <p>The Parish Council has raised some concerns about the proposed parking and access arrangements in the scheme, and believe that these should be re-considered. This is something that our client is happy to do. However, the positive responses from both Historic England and the Parish Council, in respect of the focus of the cohousing dwelling units on the Glebelands site, should give the LPA absolute confidence to allocate our client's site for approximately 20 dwellings in the Site Allocations Plan.</p> <p>Cohousing projects such as the one proposed by our client contribute directly towards the Government's objective of diversifying the housing market by supporting new and different providers, as set out in the White Paper: <i>Fixing Our Broken Housing Market</i>. The Government is clearly keen to bring 'new players' into the housing market to help improve choice, opportunity and options for everyone. The proposed cohousing scheme at Congresbury is one such example, providing an opportunity for people to establish an intentional, intergenerational community based on an ethos valued by choice, which will have wider community benefits for all the reasons set out in the attached letters dated 28th March and 27th July 2017. Furthermore, the scheme is deliverable within the next five years.</p> <p>Conclusions and Recommendations</p>	

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		<p>The Proposed Modifications are insufficient to make the Site Allocations Plan sound. Specifically, the Plan has not been 'positively prepared' and is not 'justified'; two of the tests of soundness set out at paragraph 182 of the NPPF.</p> <p>In order to address this issue, we strongly urge the Inspector to pause examination and advise the LPA that they need to undertake a more thorough site assessment process that identifies sufficient sites to address the significant shortfall in the LPA's 5-year housing land supply, and ensure that they meet their overall housing requirement for the plan period. Furthermore, as part of that process, we ask that the Inspector recommends to the LPA that the Land at Station Road, Congresbury (our client's site) is identified as a housing allocation for approximately 20 dwellings in the Site Allocations Plan.</p> <p>PLEASE SEE ATTACHMENT TO VIEW APPENDICES</p>	
South Bristol Business (M. Knight)	17923265//1	<p>Who we are: South Bristol Business is an informal group of businesses who came together in 2009 to give positive support to the plans to build the South Bristol Link. We are committed to continuing to give support to plans to further improve the wider economy of South Bristol.</p> <p>SBB - Response. We welcome the opportunity Local Plan Consultation gives to introduce ourselves to North Somerset Council and to convey our private sector business based comments.</p> <p>House-building. South Bristol Business supports North Somerset Council plans to increase housing provision, to respond to Government policy to address the Nation's housing shortage.</p>	

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		<p>Adequacy of Employment Land. We support policies to significantly increase new business creation, expansion of existing businesses and thereby, the creation of jobs and employment, particularly, for local people. However, we have concerns as to whether there is an adequate supply of allocated Employment Land for both commercial and industrial uses within the North Somerset Council Local Plan to meet this great challenge. We support the provision of adequate “high tec” and “low tech” job creation and we applaud and support Junction 21 - Weston Gateway new business and employment developments.</p> <p>The wider North Somerset and South Bristol economy – Adequacy of Employment Land and Infrastructure. We wish to highlight within the context of the Local Plan, the economic and employment dimension within the wider area of the North Somerset Council northern boundary with Bristol City Council –South Bristol boundary. We recognise that this is at the same time, both a local matter and a wider West of England strategic matter, as in practice North Somerset and South Bristol are inextricably joined in economic terms. North Somerset has not seen private sector employment growth opportunities, on its northern border, to complement past, current and future house-building outputs and Bristol City Council has similarly not been able to achieve private sector business and employment expansion in South Bristol. We believe a strong contributory reason for this regrettable position is the lack of Employment Land and traffic infrastructure provision. This must be a matter of ongoing concern for both Councils, in an area of significant population set to increase under the Local Plan. We suggest for consideration, enhanced cross border local authority dialogue with private sector business to address the issues to secure private sector business and employment generation over this wider area.</p> <p>Bristol Airport. We recognise the importance, special economic and employment significance of Bristol Airport both locally within the North Somerset/ South Bristol economic conurbation and regionally across the South West. Sustainable</p>	

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		<p>Communities. We support the planning concept of providing new housing and employment opportunities as near as possible to each other.</p> <p>Mike Knight, for South Bristol Business.</p>	
Development Industry Consortium Response	17924353//1	<p>This is a joint response by the development industry consortium to the North Somerset Council Site Allocations Plan: Main Modifications consultation.</p> <p>This statement is agreed by:</p> <p>Paul Davis on behalf of Persimmon Homes Robert Wilding on behalf of Gladman Developments Ltd Lucy White on behalf of Redcliffe Homes Dr Tom Rocke on behalf of MacTaggart and Mickel Homes Jeff Richards on behalf of Taylor Wimpey Peter Stockall on behalf of St Modwen Mark Jackson on behalf of Gleeson Homes</p> <p>Introduction</p> <p>Background following the close of EiP</p> <p>This representation is a joint response submitted by the development industry consortium in response to the current consultation on the Main Modifications of the Sites and Policies Plan Part 2: Site Allocations Plan (SAP). Public consultation commenced on 18th September and closes on 30th October 2017.</p>	<p> NSC SAP Main Modifications - Development Industry Consortium Representation.pdf (2.6 MB)</p>

Respondent Name	Comment ID	Comment	Attached documents
		<p>This representation is focussed on the issue of housing only and responds to modifications AM6 and MM1. Participants of the development industry consortium may submit their own individual representations on other aspects of the Site Allocations Plan.</p> <p>Following the SAP hearings in May 2017, the Inspector (Mrs Wendy Burden), issued a Note (ID-4) to North Somerset Council (NSC). The Note provided written guidance to the Council in relation to the additional housing sites requested during the Matter 2 (Housing) Hearing session. The Inspector concluded that <i>‘I therefore look to the Council to test the allocation of additional sites within the SAP which would have the capacity to accommodate up to 2,500 dwellings, and which have a realistic chance of being delivered by the end of the CS period in 2026.’</i></p> <p><i>In response the Council:</i></p> <ul style="list-style-type: none"> • Provided the Inspector with a timetable for their response on 20th July 2017; • Consulted on 28 sites which would have provided 1,189 dwellings between 1st and 21st August 2017; • The development industry consortium responded in detail and raising significant concerns about a number of the proposed new sites and a copy is attached at Appendix 1; • On 5th September 2017, the North Somerset Executive Committee approved the inclusion of an additional 22 sites for 821 dwellings. The Council informed the Inspector on the 6th September 2017 and provided a new housing trajectory (CD4a); and • Provided a full schedule of Modifications to the Inspector who requested the current consultation be carried out. <p>The “Current Trajectory of All Sites” contained within CD4a Schedule 1 as</p>	

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		<p>updated September 2017 identifies North Somerset Council’s current identified housing supply. This is explored in more detail in Chapter 4 of this representation.</p> <p>Methodology</p> <p>Inspector Burden’s letter to the Council (ID-4) establishes firm and clear advice to NSC on the approach which needs to be adopted in order to achieve a sound plan.</p> <p>ID4 reaffirms the verbal advice provided by Inspector Burden to the participants at the Site Allocations Examination. In light of her conclusions that the Sedgefield approach is the correct approach to calculating the 5 year housing land requirement and a 20% buffer must be applied to that requirement, she has found that the Council was unable to demonstrate a 5 year supply of housing and moreover she concluded that:</p> <p>“there are sound reasons for considering that there are a number of sites within the SAP which are unlikely to come forward for development in the timescale envisaged by the Council, either within the first five years after adoption of the SAP, or in the remaining period of the CS to 2026.” (Paragraph 13, ID4).</p> <p>Within this context, the Inspector concluded that a 20% non-implementation allowance should be applied to the overall residual housing requirement, and that <i>“a level of up to 2,500 units would...provide more certainty that the 20,985 dwellings required by the CS would be delivered by 2026”</i> (paragraph 20, ID4).</p> <p>At no point in her letter to the Council does the Inspector invite further discussion on the calculation of the additional housing allowance. Indeed, in reply to the Council’s</p>	

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		<p>initial response at the Examination that finding sites for an additional 2,500 dwellings would be ‘challenging’, she reiterated that the Council should aim to provide them. NSC’s role at this stage is therefore limited to testing the provision of additional allocations and draft proposed modifications to the Plan to achieve the additional site allocations. It is within this context, we comment on the provisions of CD2.</p> <p>Paragraphs 1 and 2 of NSC’s response to the Inspector (CD2) broadly agree with the Inspector’s assessment of what is required. However in paragraph 7, the Council expresses concerns regarding the derivation of the additional housing requirement and revisits the calculation of the additional site allocations allowance seeking to reopen the examination debate and the Inspector’s findings (ID4). That approach is fundamentally wrong. It is our collective view that:</p> <ul style="list-style-type: none"> • Option (a) is not an appropriate basis for calculating the allowance for additional site allocations; • Option (c) is wrong because it assumes the 5,665 is guaranteed and can be treated in same way as completions; and • Option (d) relates to 5 year supply only. <p>Therefore, in our view the only realistic and appropriate option is (b). The Inspector is absolutely clear in paragraphs 2, 3, 20, 22 and 27 of her letter to the Council (ID4) that the figure to be tested is up to 2,500 dwellings. This is necessary to achieve a flexible supply capable of delivering the adopted housing requirement of 20,985 over the plan period, which itself is not based on an up to date OAN and is not NPPF compliant. The emerging West of England Joint Spatial Plan and the Government’s proposed formula for OAN would result in a further uplift to OAN (1,305 dpa Government figure). The need to boost housing supply is not limited to this Core Strategy and therefore the Council needs to take a proactive stance now</p>	

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		<p>In testing the 2,500 figure, the Council must not fall into the trap of only considering sites which are broadly consistent with the Core Strategy. This could rule out sites in the development pipeline which are nevertheless deliverable. The Inspector also made it clear during the Examination that it would be necessary to revisit the strategic gaps designated in the emerging SAP. The assessment should identify all sites within the development pipeline and carry out a balancing exercise to assess deliverability against policy. This should take account of the Inspector's comments in paragraphs 23 and 26 of ID4. In addition paragraph 23 of ID4 says Policy CS14 does '<i>not constitute a strait jacket to be achieved</i>', but is a '<i>broad distribution of new dwellings</i>' and further says sites which are broadly consistent with the CS spatial strategy is a '<i>starting point</i>'.</p> <p>The Council has not assessed omission sites which are in accordance with the Core Strategy yet are not in the 'development pipeline'. This approach is contrary to paragraph 24 of the Inspector's letter. Omission sites should not be dismissed at this stage simply on the basis they have not met the Council's threshold for being in the 'development pipeline'. We note the sites which were being assessed in the August 2017 consultation included those with recent EIA screening requests or pre application 'discussions' (rather than formal pre application submission). It could be argued that omission sites which have been promoted through the correct channels over a significant period of time have a greater evidence base demonstrating deliverability and will be ready for application submission ahead of some of these sites now being assessed. There are also omission sites at appeal which are considered to be in broad accordance with the Core Strategy, but have again been dismissed as they are not current applications</p>	

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		<p>The Inspector recommended a collaborative approach between the Council and developers to establish delivery trajectories for housing sites (para.25 of ID4). However, the Council has not been willing to accept submissions from the development industry for sites which step outside the Council's narrow definition of qualifying sites</p> <p>By not fully testing all potential sites the Council have underestimated the potential supply. Looking at the sites in Part 1 of CD2a and assuming the 27 sites are in the figures, there are 9,221 units on remaining sites in 4 categories. Further accepting the removal of green belt sites (7,760), taking account of the Congresbury appeal being dismissed (80) (2nd application was approved and included in the Council's five year housing land supply statement), double counting of the Cox's Green application (28), the 'Land north of Chestnut Drive, Claverham' application (85) being withdrawn, that leaves 1,268 units on non-green belt sites which should be included in any assessment. Adding this 1,268 to the 1,812 units the Council have identified (CD2a Part 2) produces a total of 3,080 which if discounted by 20% gives a total of 2,464</p> <p>Setting aside Green Belt sites, the process by which sites had been selected as being broadly in conformity with the Core Strategy (and therefore included in Part 2 for further assessment), or deemed to be contrary to the Core Strategy framework (and therefore consigned to Part 1 and not subject to further assessment) is neither transparent nor robust</p> <p>Moreover, some sites that were previously identified in ED36 (such as Weston Business Park, Laney's Drove) as being in conformity with the Core Strategy framework and therefore to be considered further, are now excluded from further consideration on the basis that they are now considered not to be in conformity with the Core Strategy framework. Given that the Core Strategy</p>	

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		<p data-bbox="645 328 1518 392">framework has not changed in the interim, it is difficult to comprehend the justification for this reassignment</p> <p data-bbox="645 432 1574 815">The categorisation of sites identified in CD2a as ‘town’, ‘village extension’ and ‘countryside’, and indeed the reassignment of some sites to a different category from that to which they were assigned in ED36, is therefore arbitrary, lacking in transparency and unjustified by evidence. The importance in the Council’s approach of a site’s categorisation as to whether it is taken forward for further consideration under Part 2, or rejected as a potential development opportunity at the Part 1 stage, is a significant flaw in the site selection process in their Further Sites Assessment consultation. It is therefore imperative that all non-Green Belt sites in the development pipeline are properly considered, and not rejected on the basis of an arbitrary and non-transparent process of categorisation that is neither supported by evidence nor justified</p> <p data-bbox="645 855 1574 1174">In allocating additional sites the Council should seek to maximise housing supply from a wide range of sites by size and market location (as encouraged by the Inspector in paragraph 25 of her letter of 26th June, ID4). The Council should also take measures to improve the delivery of existing sites. All this will help to provide choice for house builders and avoid market saturation of particular house types or in certain locations, thereby maximising delivery rates. In addition, the Housing White Paper emphasises that a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p> <p data-bbox="539 1206 887 1238">Individual Site Assessments</p> <p data-bbox="539 1278 633 1310">Purpose</p>	

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		<p>This Chapter sets out the development industry’s comments in relation to specific sites where agreed by all contributors. In their representation to the Further Sites Assessments consultation, the development industry provided detailed comments on each of the 28 individual sites which were assessed by the Council as being broadly in conformity with the adopted Core Strategy. For this representation, we will only focus on the 22 sites which have now been recommended for inclusion in the SAP by North Somerset’s Executive Committee.</p> <p>The Council only produced site assessments for those sites which were on the Part 2 list, but we consider that the Council should have widened its net to include sites in Part 1 which are in the development pipeline. Accordingly, the Council should publish site assessments for these sites and liaise with the development industry regarding their delivery rates if these are not already known.</p> <p>However, in terms of the deliverability of sites, again the Inspector was clear that the majority of the new sites identified should be deliverable within the 5 years but this does not need to be case for all sites, providing they are delivered by 2026. However, it is then important that the majority of sites are deliverable in 5 years.</p> <p>Detailed Site Assessment Comments</p> <ul style="list-style-type: none"> • Dauncey’s Hotel, W-S-M – We note that the Council has not received a response from the agent or developer for this site. As such, there is uncertainty as to whether this site is currently available or deliverable. At this stage, we suggest that it could be included in the plan period but should not count towards 5 year supply. • 26 Lower Bristol Road, W-S-M – Pre-application requested in June 2017. There is currently a vacant care home on site. The site is within the Boulevard/ Montpelier Conservation Area and close to/ potentially overlooking the Bristol 	

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		<p>Road Baptist Church Listed Building. Both have the potential to constrain development potential. Topography of the site is fairly steep which is likely to reduce the developable area. This site could be identified for development subject to a thorough review of the site constraints and resultant capacity.</p> <ul style="list-style-type: none"> • Queensway/Midhaven Rise, W-S-M – The development industry consortium notes that this site will require the relocation of the playing pitch and identifies that it will not deliver in the five year period. At this stage, we suggest that it could be included in the plan for residential development subject to a replacement pitch being provided but this site should not count towards 5 year supply • Land at Wilson Gardens/Scot Elm Drive, W-S-M – The development industry consortium agree that this site has the potential to deliver in 5 years. • Waverley House, Clevedon – The development industry agree that this site will deliver in 5 years but note for the record that this scheme as per the other Clevedon proposals is for apartments with no affordable provision. • 2-6 Bay Road, Clevedon – The application is for a change of use from a nursing home (C2) to 19 self-contained flats (C3) and was submitted by Cherry Rose Limited in May 2017. The site is currently operating as Bay View Residential and Nursing Home. At this stage, we understand the applicants are undertaking a viability appraisal to support the planning process. At this stage, we suggest that it could be included in the plan period but, until viability is confirmed, it should not count towards 5 year supply. • Court Farm, Clevedon –The site lies immediately adjacent to the Grade II* Historic Park and Gardens of Clevedon Court, a Grade I listed building with other listed buildings and boundary wall along the public highway. The listed wall abuts the southern boundary of the proposed allocation and the proposed site is viewed within the context of this significant heritage asset. In the absence of any due consideration of the impact of the proposals (also noting the incorrect ‘green’ grading in SA4 of the Sustainability Appraisal – ‘not 	

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		<p>close to any heritage assets’) on the heritage asset and any necessary mitigation, the capacity of the site cannot be relied upon. The development consortium agree that this site will not come forward within the next five years or within the remainder of the plan period.</p> <ul style="list-style-type: none"> • Weston College, Nailsea - The development industry consortium notes that there has been no agent response. The Council assessment notes an ownership dispute will not be resolved in the short term and therefore cannot be considered deliverable at this stage. • North of Youngwood Lane – An application for outline planning permission was registered in July 2016 and is awaiting determination. In the light of this the development industry consortium agree that, if this site were identified in the SAP, it has the potential to make a significant contribution in the 5 year period and to deliver during the plan period. • Harbour Road/Serbert Way, Portishead – The development industry consortium agrees that this site has the potential to deliver in 5 years. • Land at Wyndham Way, Portishead – The application is for 33 dwellings, not 35 as specified in the Council’s housing trajectory (CD4a). The development industry consortium agrees that this site has the potential to deliver in 5 years. • Site V2 Harbour Road, Portishead – The development industry consortium agree that this site has the potential to deliver in 5 years. • South of Cadbury Garden Centre – The development industry consortium agree that this site has the potential to deliver in 5 years. • Shipham Lane, Winscombe – The development industry consortium agree that this site has the potential to deliver in 5 years. • Coombe Farm, Winscombe – The development industry consortium agree that this site has the potential to deliver in 5 years. • Broadleaze Farm, Winscombe – The application is contrary to Policy CS32 of the Core Strategy. The site is in close proximity to the Mendip Hills AONB 	



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		<p>and has potential to cause adverse impact to it. Potential access issues (legal) to address. We also note that there are drainage constraints.</p> <ul style="list-style-type: none"> • Cox's Green, Wroughton – During the recent S.78 appeal (September/October 2017) into a scheme for 59 dwellings relating to this site and adjoining land, the Council withdrew its objection to the appeal proposals during the course of the Inquiry. The development industry consortium agree that this site has the potential to deliver in the five year period. • South of Bristol Road, Churchill – We note that there is a flood risk objection to this site but the development industry consortium agree that this site has the potential to deliver in 5 years. • F Sweeting & Son, Sandford – This site is detached from settlement, it is not currently available (currently in use as a haulage yard) and lies adjacent to the AONB. Objections have been submitted to the planning application from various consultees including: Environment Agency, Internal Levels IDB, Noise and Highways. Council assessment also recognise constraints in terms of pylon corridor, Towerhead Brook, contamination, archaeology, ecology, AONB, safe access, sustainability and viability. In addition, the Council confirm that a response was received from the Agent / Developer which cannot confirm the deliverability of this site. The development consortium agree that this site will not come forward within the next five years or within the remainder of the plan period. • Barrow Hospital (66 units) – The development industry consortium agree that this site has the potential to deliver in 5 years. • Barrow Hospital (14 units) - The development industry consortium agree that this site has the potential to deliver in 5 years. • Winford Coach Station - The development industry consortium agree that this site has the potential to deliver in 5 years. <p>The development industry consortium are in agreement that only 14 out of the</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>22 sites which have been recommended for inclusion in the Sites Allocations Plan (totalling 821 dwellings), have the potential to be delivered within the next five years. The combined total of the 14 sites which would contribute to the 5YHLS position is 611 dwellings. This is circa 25% of what the Inspector had requested the Council to identify in ID-4.</p> <p>A more detailed look at the 22 sites outlined above can be found in a table at Appendix 1.</p> <p>Five year housing land supply</p> <p>North Somerset Housing Trajectory Update - September 2017</p> <p>It is agreed between the parties that the Council must deliver a five year supply of 9,524 dwellings based on the Sedgefield methodology and a 20% buffer in recognition of the persistent under-delivery of housing within North Somerset. The Site Allocations Plan Schedule 1 of sites (CD4a - September 2017) demonstrates that through the Main Modifications the Council can only demonstrate a deliverable supply of 9,149 dwellings from 1st April 2017 – 31st March 2022. The Council, even on their own deliverable supply figures, acknowledge that they are 375 dwellings short of this requirement and this is an agreed position by the Council as can be seen in Appendix 3. The Inspector addressed the lapse rate issue in relation to the small consented sites at para. 16 of her Note to the Council (ID-4). The development industry argued that a 17% lapse rate should be applied. The Inspector favoured the development industry's position and maintained that <i>"a 10% lapse rate is adopted by the Council, but evidence indicates this is optimistic for North Somerset."</i> Despite this conclusion, the Council have ignored this advice and have kept the lapse rate at 10% in their updated housing trajectory. Application of a 17% lapse rate would reduce the Council's deliverable supply by 113 dwellings.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>The Weston Villages (Locking Parklands and Winterstoke Village) were discussed at length during the Matter 2 Hearing session. Significant concerns were raised by participants of the development industry consortium in relation to the Council's delivery rates on these two sites. The Council are still purporting highly ambitious delivery rates from these two strategic sites, despite the Inspector favouring the development industry's position and the updates provided by participants who are actively involved in the detailed delivery of the two strategic sites. We would note that since the hearing sessions, a major proportion of the Parklands Village element of the Weston Villages (notably the Mead land and the North Somerset land) is still not in control of house builders, and commencement of the North South link road which will open up the Council's land and assist in the delivery of the wider Parklands Village has been further delayed until next year.</p> <p>The highest completions recorded nationally from an SUE is 610 d.p.a., whereas the national average per year is around 350 d.p.a. House builders would have to build houses at unprecedented rates to achieve such an ambitious target. The revised delivery rates of 690 dwellings (2019/20), 700 dwellings (2020/21) and 750 dwellings (2021/22) are simply unachievable.</p> <p>North Somerset Council position (September 2017): 4.80 years Development Industry position (September 2017): 3.20 years</p> <p>PLEASE SEE ATTACHMENT FOR FULL TABLES</p> <p>The development industry's position has increased from 2.97 years (April 2017) to 3.20 years (September 2017) following the inclusion of the additional 22 sites in the Main Modifications version. The development industry's deliverable supply is still some 3,071 dwellings short of the minimum five-year requirement.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="539 328 920 352">Recent and forthcoming appeals</p> <p data-bbox="539 395 1581 456">By their own admission North Somerset continue to accept that they cannot demonstrate a 5YHLS:</p> <ul data-bbox="613 499 1581 879" style="list-style-type: none"> <li data-bbox="613 499 1581 667">• The Council accepted at the recent ‘Land off Cox’s Green, Wrington’ appeal (3156081) in a Statement of Common Ground dated 11th September 2017 that they could not currently demonstrate 5YHLS and a Housing Land Supply Note was agreed between the parties during the inquiry (Please see Appendix 3) <li data-bbox="613 675 1581 775">• It has also been agreed between the parties for the forthcoming Land off Stowey Road, Yatton inquiry (APP/D0121/W/17/3170103) starting on 31st October 2017 that the Council cannot demonstrate a 5YHLS. <li data-bbox="613 783 1581 879">• On 4th October 2017, the Council published the Agenda for the 11th October 2017 Planning and Regulatory Committee. The Officer Report for Land to the north of Leafy Way and Bartletts Way, Locking confirms there is no 5YHLS. <p data-bbox="539 922 1032 946">Conclusion on Five Year Supply Position</p> <p data-bbox="539 989 1581 1193">There still remains a significant difference between the five-year deliverable supply of NSC and the development industry consortium, despite being 5 ½ months on from the conclusion of the SAP EiP hearing sessions. The Council, even on their own judgement of their deliverable supply, acknowledge that they cannot currently demonstrate a 5YHLS. In their September 2017 Housing Trajectory Update, the Council’s deliverable supply for 1st April 2017 – 31st March 2022 totals 9,149 (4.8 years).</p> <p data-bbox="539 1236 1581 1337">The development industry’s supply position has risen marginally from 2.97 years to 3.2 years since April 2017. The Inspector requested that the Council identify additional sites to ‘close the gap’ between the Council’s position and the development industry. The</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Council has been unwilling to accept that an additional 2,500 dwellings are required to achieve a sound plan. Moreover, the Council has adopted a narrow definition of qualifying sites for assessment and inclusion within the plan.</p> <p>The development industry accepts that the Inspector’s request for the Council to identify additional land was intended to address any shortcomings in the identified supply highlighted by consultees.</p> <p>However, in the absence of a comprehensive assessment of housing land by the Council to identify all suitable and deliverable land, the development industry maintains its objections to the original allocations and recommends delivery rates are amended accordingly to reflect a more realistic housing trajectory for the plan.</p> <p>Overall Conclusions</p> <p>The overall conclusions of the development consortium are that:</p> <ul style="list-style-type: none"> • The council has not paid sufficient regard to the Inspector’s conclusion following the previous hearing sessions that they should test the allocation of sites which would have the capacity to accommodate up to 2,500 dwellings. • Even if all 821 units identified by the Council are delivered in 5 years it represents only 32.8% of the 2,500 (but the consortium consider this is optimistic and only 611, or 24.4% are realistically available). • The Council cannot deliver a five year housing land supply and the Proposed Modifications do not sufficiently close the gap between the calculations of housing land supply produced by the Council and the developers (paragraph 20 ID4). • All this is as a result of the Council not fully examining the full potential of the possible available supply, and fundamentally failing to ‘work closely with the 	

Respondent Name	Comment ID	Comment	Attached documents
		<p>development industry' to understand the position on the ground as specifically recommended by the Inspector (para. 25 of ID4).</p> <p>The development industry consortium therefore <u>invites the Inspector to hold further Hearing sessions</u> as there remain significant issues as summarised above (and additional matters including strategic gaps and employment sites flagged within our individual submissions) which North Somerset Council have <u>yet again</u> failed to address, despite the Inspector's recommendations at the Hearing sessions in May 2017 and within her Post Hearings Note to the Council.</p> <p>PLEASE SEE ATTACHMENT FOR FULL TABLES AND APPENDICES</p>	
Group West (Highridge)	17925057//1	<p>Examination into the soundness of the North Somerset Site Allocations Plan: Proposed Modifications -Highridge, Anton Bantock Way</p> <p>I write on behalf of Group West and their landowner clients at Highridge in respect the ongoing examination of the North Somerset Site Allocations Plan and the publication of proposed modifications to that Plan. A site location plan is appended to these representations.</p> <p>Group West raises soundness concerns in respect of the proposed modifications in respect of the following issues:</p>	 Highridge.pdf (170 KB)  P17-1777_01-2C SLP.PDF (5.3 MB)

Respondent Name	Comment ID	Comment	Attached documents
		<p>1. Insufficient housing sites have been identified to achieve the requisite 5-year supply requirement, nor to achieve the flexibility and certainty that the overall CS requirement to 2026 will be delivered.</p> <p>2. Land at Highridge, should be removed from the Green Belt in order to address these matters.</p> <p>Issue 1</p> <p>The Council submitted Part 2 of its Site Allocations Plan (SAP) for examination on 24th February 2017. Following the examination hearings in May 2017 the Inspector wrote to the Council on 26th June 2017 setting out further guidance in relation to the delivery of housing.</p> <p>To secure the delivery of Core Strategy (CS) Policy CS13, the Inspector considered it necessary for the Council to test the provision of additional sites for up to 2,500 homes within the SAP. Specifically, the following key points were noted:</p> <ul style="list-style-type: none"> • <i>"The additional sites for up to 2,500 dwellings are not a proposal to increase the overall housing target identified in Policy CS13.</i> • <i>The identification of additional sites would help to provide flexibility and certainty that the CS housing requirement can be met since:</i> <ul style="list-style-type: none"> o <i>Due to constraints on sites allocated in the SAP it is not certain that they will be developed by 2026;</i> o <i>Additional sites are required to make up for those which are unlikely to be delivered.</i> 	

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="539 328 1518 427">• <i>The increased choice and flexibility provided by additional allocations in the SAP would assist the Council in demonstrating that they have a five-year housing land supply."</i></p> <p data-bbox="539 467 1563 603">The Inspector made other conclusions regarding the application of the Sedgefield methodology and appropriateness of a 20% buffer for persistent under delivery. Within the letter, the Inspector also noted that the Council had proposed to test sites for allocation that accorded with all the following criteria:</p> <ul data-bbox="539 643 1507 914" style="list-style-type: none"> <li data-bbox="539 643 1507 742">• <i>"Sites which are broadly consistent with the Core Strategy spatial strategy (sites within or adjacent to Weston, the towns and service villages, but not infill villages, countryside or Green Belt).</i> <li data-bbox="539 778 1406 810">• <i>Sites which have been considered through the SAP examination process.</i> <li data-bbox="539 847 1440 914">• <i>Sites which are in the development pipeline – as these are more likely to be deliverable and could potentially contribute to 5-year supply."</i> <p data-bbox="539 954 1563 1161">In respect of the first bullet it should be noted that the Inspector’s view (as expressed in paragraph 23) was that the ‘starting point’ must be to identify sites which are broadly consistent with the CS spatial strategy. This leaves the option open for sites beyond the spatial strategy to be allocated if needed to generate the requisite supply. Consequently, the starting point is by no means the ending point – albeit the Council have not even gone passed the starting point, by sourcing a lower level of supply of houses.</p> <p data-bbox="539 1201 1552 1337">The Council issued an interim response on 20th July (CD2 and CD2a). In paragraphs 7-15 it challenged the need to allocate as many as 2,500 homes. The Council chose to open with a ‘negotiation’ and justify the identification of a lower level of housing supply. In Group West’s view this was not the correct approach and it is disappointing</p>	


Respondent Name	Comment ID	Comment	Attached documents
		<p>that the Council sought to claim that a significantly reduced ‘offer’ accorded with the ‘up to’ testing direction given by the Inspector. This strategic justification for a lower number has skewed the site search exercise that has followed, and, the Council has been driven by a self-determined target for the additional sites/dwellings that should be presented for allocation. This has narrowed its focus.</p> <p>It is Group West’s view that the Inspector wanted to be presented with sites capable of achieving 2,500 homes, not only for delivery with the next 5 years but to 2026, in order to be able to identify environmental costs of this level of supply. Based on this information, it was then envisaged that a supplemental exercise would be necessary to determine whether 2,500 homes should ultimately be identified, or whether a lower figure was justified. By selecting sites that accorded only with all of the three criteria the Council appears to have only considered sites that are deliverable in the next 5-years. However, this was not the brief from Inspector as the instruction was not focused solely on immediately deliverable supply.</p> <p>Furthermore, if insufficient sites are identified in relation to the starting point criteria, it does not follow that the modifications exercise ends with the consequent offer. The Inspector needs to see what the implications are of allocating a full range of sites.</p> <p>Group West’s view is that the Inspector does not have the information that would enable a final judgment to be made, and that a number of sites or sources have either been unsoundly discounted or simply not assessed.</p> <p>Fundamentally, a 5-year supply at adoption needs to be secured (although sites offering medium term flexibility also have value based on the Inspector’s instructions, but seem to have been discounted by the Council). The evidence of the development industry at the hearings was that there was a significant gap between its assessed deliverable supply and what the Council were assuming (a gap of 3,859 dwellings). The Inspector’s</p>	

Respondent Name	Comment ID	Comment	Attached documents			
		<p>instruction in ID/4 to test up to 2,500 homes is reflective of a wide gap in 5-year supply, albeit not as high as 3,859.</p> <p>In response, the Council identified a short list of 28 sites yielding an estimated 1,763 units that accorded with its three selection criteria. This list excluded sites which had previously been refused or are awaiting an appeal or decision and is therefore flawed from the outset. Moreover, the lack level of identified supply suggests that that ‘net’ should be cast wider than the Council’s methods allow for. The list then became a final ‘short list’ of 22 sites that are now proposed for allocation, following the September 5th Cabinet meeting, yielding just 821 units.</p> <p>The Council seems to have congratulated itself that this supply is sufficient to exceed the contested by year deliverable supply gap of 3,859 dwellings by 20%. However, the Council’s position/analysis significantly misses the point. The 5-year supply gap needs to be fully addressed, not partly buffered as this would be inconsistent with NPPF:14.</p> <p>It is acknowledged that the Inspector has asked the Council to test up to 2,500 dwellings, rather than 3,859 dwellings, however a significant gap of 1,679 dwellings remains between 821 dwellings and 2,500 dwellings. In our analysis, there is still some way to go to achieve the requisite deliverable 5-year supply of 9,534 dwellings. Group West’s position is that there remains scope within the context of NPPF:14 to move closer to the requisite supply figure, in a way that satisfies the tilted balance.</p> <table border="1" data-bbox="542 1129 1579 1353"> <tr> <td data-bbox="542 1129 1256 1353">Indeed, by reference to CD4a [Schedule 1 Information updated September 2017], even if the Council’s own site-specific assumptions are all accepted there is still a deficit of 385 dwellings.</td> <td data-bbox="1263 1129 1417 1353">Council’s Assumption</td> <td data-bbox="1424 1129 1579 1353">Council’s Cumulative Assumption</td> </tr> </table>	Indeed, by reference to CD4a [Schedule 1 Information updated September 2017], even if the Council’s own site-specific assumptions are all accepted there is still a deficit of 385 dwellings.	Council’s Assumption	Council’s Cumulative Assumption	
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Respondent Name	Comment ID	Comment	Attached documents		
		Year			
		2017/18	1,026	1,026	
		2018/19	1,792	2,818	
		2019/20	2,529	5,347	
		2020/21	2,135	7,482	
		2021/22	1,167	9,149	
		5 year requirement	9,534		
		5 year shortfall (on Council's own figures including proposed additional sites)	-385		
		However, in reality there remains a very high degree of risk within these figures, not least in relation the trajectories for Weston Villages and Parklands Village in particular.			

Respondent Name	Comment ID	Comment	Attached documents
		<p>We suggest that a further set of modifications with a further tranche allocations is needed to achieve a 5 year supply and to meaningfully de-risk achieving the overall CS requirement.</p> <p>Furthermore, the Council can place little if any reliance on the West of England JSP process correcting any deficiencies as (1) it is only identifying strategic locations for longer development with complex infrastructure pre-requisites e.g. new motorway junctions and very significant new lengths of highway connecting Bristol Airport to the M5, and (2) it only proposes 1,000 units on non-strategic sites (hence the Council's identification of only 821 units in the current SAP modifications). The JSP, and by implication, the North Somerset Local Plan Review are not currently set up as vehicles to boost 5 year supply to 2026.</p> <p>Issue 2</p> <p>The land that is the subject of this letter presents a highly sustainable and deliverable site for addressing the issues highlighted by the Inspector in ID/4.</p> <p>Aside from the playing field between Elsbert Drive and Rose Meare Garden's (beyond the site) the undeveloped area between the newly constructed South Bristol Ring Road and Highridge Green, is within the Green Belt. The effect of the new South Bristol Ring Road has a significant effect on the strength of the Green Belt in this location.</p> <p>The land is identified as falling within cell 59b of the West of England Stage 2 Green Belt Assessment (November 2016) and is assessed by the authorities in relation to the 5 Green Belt purposes as set out below:</p> <ol style="list-style-type: none"> 1. Checking the unrestricted sprawl of Bristol 	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Limited Contribution: Small area of farmland and recreation use between the urban edge of Bristol and the newly constructed South Bristol Link (SBL). New road forms a strong physical boundary feature 100-300m from the urban boundary which encloses the cell.</p> <p>2. Preventing neighbouring towns merging into one another</p> <p>No contribution</p> <p>3. Assisting in safeguarding the countryside from encroachment</p> <p>Limited Contribution: The cell comprises mainly agricultural land immediately adjacent to the urban area. It is affected by the route of the South Bristol link which limits its connectivity with the wider countryside</p> <p>4. Preserving the setting and character of historic towns</p> <p>No contribution</p> <p>5. Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land – Limited Contribution</p> <p>The cell has played a role in checking the unrestricted sprawl of the nearby urban area however the construction of the South Bristol Link has created a more defensible boundary close to the urban area and resulted in a small area of land which is cut off from the wider countryside. Accordingly, it can be said that the Stage 2 Green Belt assessment does not rate the Green Belt in this location very highly.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>We submit that the land can sustainably address the immediate issues identified by the Inspector in ID/4. It would equally and at the same time address housing needs in the longer term to 2036.</p> <p>This area measures around 14ha and is not identified in the Regulation 19 West of England JSP for strategic development (for which the threshold for consideration is 500 units). Whilst this threshold is contestable at examination it is the emerging policy approach of the Councils in the West of England.</p> <p>The JSP also requires that each Council identify 1,000 units on non-strategic sites (which the Council are effectively identifying early as part the proposed SAP modifications). We submit that the provision of the Regulation 19 JSP is the reason why the Council is only offering 821 units at the present time. The immediate SAP requirement is for a greater number of homes to be identified (much closer to 2,500 units) and in these circumstances the land with the South Bristol Link at Highridge should either be removed from the Green Belt, or safeguarded in the SAP to be released as part of the next North Somerset Local Plan review, which will take place soon after the JSP is adopted. Even if the land was only safeguarded in the SAP as opposed to being removed from the Green Belt, such an approach would enable a significant level of delivery by 2026.</p> <p>SEE ATTACHMENT FOR FULL TABLES AND APPENDICES</p>	
Yatton Rugby Football Club	17925185//1	<p>Examination into the soundness of the North Somerset Site Allocations Plan: Proposed Modifications</p> <p>Yatton Rugby Football Club</p>	 BRS.6625 NS SAP Mods.pdf (227 KB)  Site plan.PDF (220 KB)

Respondent Name	Comment ID	Comment	Attached documents
		<p>I write on behalf of Yatton Rugby Football Club (YFC) in respect the ongoing examination of the North Somerset Site Allocations Plan and the publication of proposed modifications to that Plan. A site location plan is appended to these representations.</p> <p>YFC raise soundness concerns in respect of the proposed modifications in respect of the following issues:</p> <ol style="list-style-type: none"> 1. Insufficient housing sites have been identified to achieve the requisite 5-year supply requirement, nor to achieve the flexibility and certainty that the overall CS requirement to 2026 will be delivered. 2. Land at Yatton Rugby Football Club, should be removed from the Green Belt in order to address these matters. <p>Issue 1</p> <p>The Council submitted Part 2 of its Site Allocations Plan (SAP) for examination on 24th February 2017. Following the examination hearings in May 2017 the Inspector wrote to the Council on 26th June 2017 setting out further guidance in relation to the delivery of housing.</p> <p>To secure the delivery of Core Strategy (CS) Policy CS13, the Inspector considered it necessary for the Council to test the provision of additional sites for up to 2,500 homes within the SAP. Specifically, the following key points were noted:</p> <ul style="list-style-type: none"> • <i>"The additional sites for up to 2,500 dwellings are not a proposal to increase the overall housing target identified in Policy CS13.</i> 	

Respondent Name	Comment ID	Comment	Attached documents
		<ul style="list-style-type: none"> • <i>The identification of additional sites would help to provide flexibility and certainty that the CS housing requirement can be met since:</i> <ul style="list-style-type: none"> o <i>Due to constraints on sites allocated in the SAP it is not certain that they will be developed by 2026;</i> o <i>Additional sites are required to make up for those which are unlikely to be delivered.</i> • <i>The increased choice and flexibility provided by additional allocations in the SAP would assist the Council in demonstrating that they have a five-year housing land supply."</i> <p>The Inspector made other conclusions regarding the application of the Sedgefield methodology and appropriateness of a 20% buffer for persistent under delivery. Within the letter, the Inspector also noted that the Council had proposed to test sites for allocation that accorded with all the following criteria:</p> <ul style="list-style-type: none"> • <i>"Sites which are broadly consistent with the Core Strategy spatial strategy (sites within or adjacent to Weston, the towns and service villages, but not infill villages, countryside or Green Belt).</i> • <i>Sites which have been considered through the SAP examination process.</i> • <i>Sites which are in the development pipeline – as these are more likely to be deliverable and could potentially contribute to 5-year supply."</i> <p>In respect of the first bullet it should be noted that the Inspector’s view (as expressed in paragraph 23) was that the ‘starting point’ must be to identify sites which are broadly consistent with the CS spatial strategy. This leaves the option open for sites beyond the</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="539 328 1563 427">spatial strategy to be allocated if needed to generate the requisite supply. Consequently, the starting point is by no means the ending point – albeit the Council have not even gone passed the starting point, by sourcing a lower level of supply of houses.</p> <p data-bbox="539 467 1563 775">The Council issued an interim response on 20th July (CD2 and CD2a). In paragraphs 7-15 it challenged the need to allocate as many as 2,500 homes. The Council chose to open with a ‘negotiation’ and justify the identification of a lower level of housing supply. In YFC’s view this was not the correct approach and it is disappointing that the Council sought to claim that a significantly reduced ‘offer’ accorded with the ‘up to’ testing direction given by the Inspector. This strategic justification for a lower number has skewed the site search exercise that has followed, and, the Council has been driven by a self-determined target for the additional sites/dwellings that should be presented for allocation. This has narrowed its focus.</p> <p data-bbox="539 815 1563 1123">It is YFC’s view that the Inspector wanted to be presented with sites capable of achieving 2,500 homes, not only for delivery with the next 5 years but to 2026, in order to be able to identify environmental costs of this level of supply. Based on this information, it was then envisaged that a supplemental exercise would be necessary to determine whether 2,500 homes should ultimately be identified, or whether a lower figure was justified. By selecting sites that accorded only with all of the three criteria the Council appears to have only considered sites that are deliverable in the next 5-years. However, this was not the brief from Inspector as the instruction was not focused solely on immediately deliverable supply.</p> <p data-bbox="539 1163 1563 1262">Furthermore, if insufficient sites are identified in relation to the starting point criteria, it does not follow that the modifications exercise ends with the consequent offer. The Inspector needs to see what the implications are of allocating a full range of sites.</p>	

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		<p>YFC's view is that the Inspector does not have the information that would enable a final judgment to be made, and that a number of sites or sources have either been unsoundly discounted or simply not assessed.</p> <p>Fundamentally, a 5-year supply at adoption needs to be secured (although sites offering medium term flexibility also have value based on the Inspector's instructions, but seem to have been discounted by the Council). The evidence of the development industry at the hearings was that there was a significant gap between its assessed deliverable supply and what the Council were assuming (a gap of 3,859 dwellings). The Inspector's instruction in ID/4 to test up to 2,500 homes is reflective of a wide gap in 5-year supply, albeit not as high as 3,859.</p> <p>In response, the Council identified a short list of 28 sites yielding an estimated 1,763 units that accorded with its three selection criteria. This list excluded sites which had previously been refused or are awaiting an appeal or decision and is therefore flawed from the outset. Moreover, the lack level of identified supply suggests that that 'net' should be cast wider than the Council's methods allow for. The list then became a final 'short list' of 22 sites that are now proposed for allocation, following the September 5th Cabinet meeting, yielding just 821 units.</p> <p>The Council seems to have congratulated itself that this supply is sufficient to exceed the contested by year deliverable supply gap of 3,859 dwellings by 20%. However, the Council's position/analysis significantly misses the point. The 5-year supply gap needs to be fully addressed, not partly buffered as this would be inconsistent with NPPF:14.</p> <p>It is acknowledged that the Inspector has asked the Council to test up to 2,500 dwellings, rather than 3,859 dwellings, however a significant gap of 1,679 dwellings remains between 821 dwellings and 2,500 dwellings. In our analysis, there is still some way to go to achieve the requisite deliverable 5-year supply of 9,534 dwellings. YFC's</p>	


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		<p>position is that there remains scope within the context of NPPF:14 to move closer to the requisite supply figure, in a way that satisfies the tilted balance.</p> <p>Indeed, by reference to CD4a [Schedule 1 Information updated September 2017], even if the Council's own site-specific assumptions are all accepted there is still a deficit of 385 dwellings.</p> <table border="1" data-bbox="539 564 1576 1340"> <thead> <tr> <th data-bbox="539 564 622 719">Year</th> <th data-bbox="622 564 1279 719">Council's Assumption</th> <th data-bbox="1279 564 1576 719">Council's Cumulative Assumption</th> </tr> </thead> <tbody> <tr> <td data-bbox="539 724 622 874">2017/18</td> <td data-bbox="622 724 1279 874">1,023</td> <td data-bbox="1279 724 1576 874">1,026</td> </tr> <tr> <td data-bbox="539 879 622 1029">2018/19</td> <td data-bbox="622 879 1279 1029">1,792</td> <td data-bbox="1279 879 1576 1029">2,818</td> </tr> <tr> <td data-bbox="539 1034 622 1184">2019/20</td> <td data-bbox="622 1034 1279 1184">2,529</td> <td data-bbox="1279 1034 1576 1184">5,347</td> </tr> <tr> <td data-bbox="539 1189 622 1339">2020/21</td> <td data-bbox="622 1189 1279 1339">2,135</td> <td data-bbox="1279 1189 1576 1339">7,482</td> </tr> </tbody> </table>	Year	Council's Assumption	Council's Cumulative Assumption	2017/18	1,023	1,026	2018/19	1,792	2,818	2019/20	2,529	5,347	2020/21	2,135	7,482	
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		<table border="1"> <tr> <td data-bbox="539 288 622 443">2021/22</td> <td data-bbox="622 288 1279 443">1,167</td> <td data-bbox="1279 288 1572 443">9,149</td> </tr> <tr> <td data-bbox="539 443 622 564"></td> <td data-bbox="622 443 1279 564">5 year requirement</td> <td data-bbox="1279 443 1572 564">9534</td> </tr> <tr> <td data-bbox="539 564 622 719"></td> <td data-bbox="622 564 1279 719">5 year shortfall (on council's own figures, including proposed additional sites</td> <td data-bbox="1279 564 1572 719">385</td> </tr> </table>	2021/22	1,167	9,149		5 year requirement	9534		5 year shortfall (on council's own figures, including proposed additional sites	385	
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		<p>However, in reality there remains a very high degree of risk within these figures, not least in relation the trajectories for Weston Villages and Parklands Village in particular. We suggest that a further set of modifications with a further tranche of allocations is needed to achieve a 5-year supply and to meaningfully de-risk achieving the overall CS requirement.</p> <p>Furthermore, the Council can place little if any reliance on the West of England JSP process correcting any deficiencies as (1) it is only identifying strategic locations for longer development with complex infrastructure pre-requisites e.g. new motorway junctions and very significant new lengths of highway connecting Bristol Airport to the M5, and (2) it only proposes 1,000 units on non-strategic sites (hence the Council's identification of only 821 units in the current SAP modifications). The JSP, and by implication, the North Somerset Local Plan Review are not currently set up as vehicles to boost 5-year supply to 2026.</p>										

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		<p data-bbox="539 328 622 352">Issue 2</p> <p data-bbox="539 395 1532 459">The land that is the subject of this letter presents a highly sustainable and deliverable site for addressing the issues highlighted by the Inspector in ID/4.</p> <p data-bbox="539 499 1563 667">However, in reality there remains a very high degree of risk within these figures, not least in relation the trajectories for Weston Villages and Parklands Village in particular. We suggest that a further set of modifications with a further tranche of allocations is needed to achieve a 5-year supply and to meaningfully de-risk achieving the overall CS requirement.</p> <p data-bbox="539 707 1563 986">Furthermore, the Council can place little if any reliance on the West of England JSP process correcting any deficiencies as (1) it is only identifying strategic locations for longer development with complex infrastructure pre-requisites e.g. new motorway junctions and very significant new lengths of highway connecting Bristol Airport to the M5, and (2) it only proposes 1,000 units on non-strategic sites (hence the Council's identification of only 821 units in the current SAP modifications). The JSP, and by implication, the North Somerset Local Plan Review are not currently set up as vehicles to boost 5-year supply to 2026.</p> <p data-bbox="539 1026 622 1050">Issue 2</p> <p data-bbox="539 1090 1532 1153">The land that is the subject of this letter presents a highly sustainable and deliverable site for addressing the issues highlighted by the Inspector in ID/4.</p> <p data-bbox="539 1193 1547 1329">Yatton Rugby Club was not on the short list of 28 sites that the Council planned to assess, despite being a site that was consistent with the spatial strategy of the Core Strategy, and being promoted in an initial representation of April 2016. Neither was it listed as a site that was not to be subject to further assessment. YFC informed the</p>	

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		<p>Council of this omission in a letter dated 16.08.2017, and expected to see it referred to within the September 5th Cabinet Report. However, when published there was no reference to the site. An email exchange with the Council confirmed that this was an unintentional omission. The omission addressed, to a degree via a verbal update, to the Cabinet report on the day of the meeting. The minutes read as follows, but we are unaware of any full , written ‘late’ suitability and sustainably appraisal of the site.</p> <p>Yatton Rugby Football Club site – Pegasus argue that this site should be included in the list of sites to be assessed. It is in a sustainable location and sandwiched between two proposed residential sites. Development will enable the club to fund a high quality, purpose built facility. The Council’s response was that as at the date of the Inspector’s letter the site was not in the development pipeline. The site was therefore not included in the assessment in accordance with the Inspector’s advice.</p> <p>The Club currently hosts fifteen different teams and plays an important role in the local community. Historically it has operated from pitches both on the land that is the subject of this letter, for which the club control the freehold and from playing fields to the west, where the club’s lease is ending.</p> <p>The land to the west, known as ‘Land at Moor Road’ is proposed for allocation in the Publication SAP, with a capacity estimate of 60 dwellings. The site is currently subject to a planning application from Persimmon for 83no. dwellings (16/P/0888/F).</p> <p>To the east ‘Land at North End’ is also allocated in the Publication SAP for 170 dwellings. Here a planning application (15/P/0946/O) for 170 dwellings has a resolution to approve subject to S106.</p>	

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		<p>As can be seen from an inspection of the emerging policies map, this leaves what is left of the Rugby club sandwiched between two developments totalling around 250 dwellings. Evidently this is a sustainable location for additional housing development.</p> <p>The site itself measure two hectares and therefore could accomodate around 7-80 dwellings.</p> <p>Extract from Publication Site Allocation Plan policies map showing proposed allocations either side of Yatton Rugby Football Club - SEE ATTACHMENT</p> <p>As a result of the loss of the pitches at Moor Road, and due to the desire to continue to expand the club, alternative land has been identified on the edge of Yatton/North End. It is the club's intention to relocate to new premises, and build a high quality, purpose built facility for the club to meet its current and future needs. Discussions are underway with the landowner. This will result in the current facility/land being surplus to requirements during the pan period.</p> <p>Given the proposed allocation of land directly adjoining the Rugby club, and in the context of the exercise that the Council is now engaged with, we submit that the Plan should enable the development of the land for housing, by either by a site-specific allocation and/or by the extension of the housing development boundary. The receipts from the sale of the land would enable relocation to take place.</p> <p>In addition, a permissive policy enabling new recreational facilities in the Yatton/North End area should be included in the Plan. The Site Allocations Plan should be proactive in enabling both outcomes, and currently it is not.</p> <p>The Council's reason for rejecting the site, based on the minutes of the September 5th Cabinet seems to be wholly predicated the fact that it is not in the development pipeline.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>At this point in time, the status of the land might preclude 5-year supply reliance. However, the Inspector's brief was also to generate flexibility of supply to 2026. It cannot be the case that only sites within the development pipeline offer flexibility to 2026 (8+ years hence). Clearly YFC offers this flexibility and the SAP should be enabling it to come forward, given that there seems to be no technical objection to housing on the site, nor what YFC are seeking to achieve more widely. YFC reiterates that although Inspector agreed a 'starting point' methodology for the identification of further housing land supply, where there remains a supply gap, the methodology needs to be extended to other sources.</p>	
Crest Nicholson (South West) Ltd	17925409//1	<p>Pineapple Farm, Congresbury, North Somerset Sites and Policies Plan, Part 2: Site Allocations Plan – Main Modifications Consultation Town and Country Planning Act (Local Planning) (England) Regulations 2012</p> <p>Introduction and Background</p> <p>I am writing on behalf of Crest Nicholson (South West) Ltd to make a representation on the Proposed Main Modifications to the Sites and Policies Plan Part 2: Site Allocations Plan (SAP) currently being consulted upon by North Somerset Council. Examination of the SAP by the Planning Inspectorate took place from 16-18 May 2017.</p> <p>Following the close of the hearings the Inspector wrote to the council setting out further work that she considered necessary to identify additional housing sites to make sure the Council can address the housing requirement over the plan period. The Council have undertaken further work, and at Executive Committee on 5 September 2017 an additional 22 sites were approved for inclusion in the plan.</p>	<p> P17-2621 NSC Rep JCM 30.10.17.pdf (625 KB)</p>


Respondent Name	Comment ID	Comment	Attached documents
		<p>The basis of this representation is that the additional land identified is still not sufficient to enable North Somerset Council to be able to demonstrate a five-year housing land supply, rendering the SAP unsound. For this reason, additional sites need to be considered for allocation within the plan totalling 1,331 dwellings.</p> <p>The 3.2 hectare parcel of land known as Pineapple Farm (identified in the attached Site Location Plan) could accommodate in the region of 120 dwellings.</p> <p>The site was previously considered under the 2014 Housing and Economic Land Availability Assessment. This document categorised the site as having ‘potential’ for 98 units across two parcels of land at the time. The site was subsequently dismissed at Consultation Stage under the summary of “adverse impact on rural setting of village” (with the eastern parcel also identified as landlocked).</p> <p>Since this time a number of permissions have been granted at Congresbury demonstrating that the area is a sustainable location for further development without harm to the rural setting of the village.</p> <p>The latter part of the representation will set out why the residential development of the site represents sustainable development and should be included in the SAP to contribute to the 5-year housing land supply.</p> <p>MM1 – Policy SA1 and supporting text</p> <p>Table 1 of the October 2016 Publication Version SAP sets out the projected housing delivery across the plan period, comprised of completions, allocations, sites with planning permission and a windfall allowance, and is supported by a spreadsheet, referred to as CD1a, showing the projected annual delivery of these sites.</p>	

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		<p>Whilst the identified supply figure of 21,051 homes, if deliverable, meets the Core Strategy OAN, it does not meet the total plan period requirement when the under-delivery to date and a 20% buffer over the next five-years are applied in line with the Inspector's recommendations. Indeed, with reference to our table below, when the past shortfall and the buffer are included the overall housing need across the plan period rises to 23,616.</p> <p>It is for this reason, together with some uncertainty about the deliverability of the sites already identified, that the Inspector considered that additional land should be allocated for a further 2,500 homes through the Main Modifications process. However, the Council has only found additional land for 821 new homes.</p> <p>SEE ATTACHMENT FOR TABLES</p> <p>As shown in row H of the table, the result of this failure to respond to the Inspector's request means that the identified supply in the SAP for the remaining plan period remains well below the actual requirement, undermining the delivery of the Core Strategy to 2026.</p> <p>In fact, due to a revised "lapse-rate"¹ and review of the rate of delivery of existing sites ('commitments'), the identified supply for the remaining plan period has actually shrunk from 13,849 to 13,438. The shortfall is therefore 1,331 dwellings.</p> <p>Critically, the Main Modifications also fail to address the uncertain deliverability of the plan in the short term, over the next five years. The supporting annual trajectory has been updated and is referred to as CD4a. Although all of the new allocation sites found for the additional 821 homes are projected to be delivered within the next five years, this document shows a total 5-year supply of 9,149 homes, and therefore that there is still not enough housing to meet the authority's five-year housing need of 9,524. The</p>	

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		<p>failure of the Main Modifications and supporting evidence to demonstrate a five-year housing land supply renders the SAP unsound.</p> <p>Deliverability of Identified Sites</p> <p>For the purposes of simplicity in comparing the SAP identified housing supply with the Inspector's request, the above discussion assumes that the Council's housing trajectory is reliable.</p> <p>However, whilst the projected supply of 9,149 homes versus the identified need of 9,524 equates to a 4.8 year housing land supply, our view is that this is not a wholly accurate figure because the trajectory is over-optimistic.</p> <p>We agree with other representations, including that made by Neil Tiley of Pegasus Group (Hearing Statement ref. HS-2-1a) in the examination hearings, that the deliverable supply from existing commitments and originally identified site allocations is less than identified by the Council due to a combination of site-specific constraints and unachievable projected build-out rates on strategic sites.</p> <p>'Paragraph 14' Plan-Making</p> <p>For these reasons, more work needs to be done to identify further sites which are available, suitable and deliverable over the next five years and the remainder of the plan period to meet the identified housing requirement.</p> <p>The 'Presumption in Favour of Sustainable Development' established in paragraph 14 of the NPPF should be seen as the 'golden thread' in the planning process:</p> <p>"For plan-making this means that:</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>• <i>Local planning authorities should positively seek opportunities to meet the development needs of their area;</i></p> <p>• <i>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or – specific policies in this Framework indicate development should be restricted.”</i></p> <p>Pineapple Farm</p> <p>The land known as Pineapple Farm consists of an agricultural field (Grade 3b), measuring 3.2 hectares, located towards the south-eastern side of the ‘Service Village’ of Congresbury. This is bounded by the defined settlement boundary to the west by Park Road and south by north of Mulberry Road. A site location plan is enclosed with this letter.</p> <p>The site slopes by approximately 6 metres from the south-west corner down to its northeast corner, with a vehicular access on its southern boundary and footpath connections to its north-west, north-east and south-east corners.</p> <p>The site is not located within the Green Belt and is not directly affected by any adopted landscape, public open space or heritage related designations. The Government’s Magic mapping service identifies the site as Grade 3b agricultural land (i.e. least valuable).</p> <p>There are no ecological designations upon the site or immediate surrounds, but the sites fall within the impact zones for Sites of Special Scientific Interest in the wider area knoww to contain bats.</p>	

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		<p>The very north-eastern corner of the site is located within Flood Risk Zones 2 and 3, with the remainder of the site within Flood Zone 1. A Public Right of Way (AX16/8/30) runs from the north-western corner diagonally across the site to its south-eastern corner. A further footpath runs from this south-eastern point to the north-eastern point along the eastern edge of the site (AX16/29/10).</p> <p>It is bordered to the north by Park Farm, consisting of the Grade II listed Park Farmhouse, whose grounds today consist of a number of independent residential properties.</p> <p>Agricultural fields are located to the east and to the south, where the adjacent field has permission for 14 dwellings accessed from Venus Street (16/P/0147/F).</p> <p>Our client has an option upon the site and this is therefore immediately available. There are no principle constraints that prevent development. The allocation of the site within the SAP would represent a logical extension to Congresbury, following the adjacent development, to deliver additional housing needed to meet the identified requirement.</p> <p>Site Assessment</p> <p>Identifying the only previous concern of the Council in dismissing the allocation of the site as the rural setting of the village, it can be demonstrated that the site is (/will be) surrounded by built form on two sides and partly to the north. The site is only meaningfully visible from the Public Right of Way network and immediate adjacent properties. The impact upon the rural setting of the village is therefore heavily restricted and certainly no greater than at other sites where this has been considered acceptable within Congresbury, such as at land south of Cobthorn Way (15/P/0519/O).</p> <p>A planning application is intended for submission during the first half of next year.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Following grant of consent, a build-out rate of 50 units a year is envisaged.</p> <p>To reiterate, the site is available now, suitable for development and deliverable. Having assessed the site, there are no principal constraints that would compromise its delivery.</p> <p>Conclusion</p> <p>The Main Modification MM1 to policy SA1 and supporting text of the SAP fail to adequately address the housing need and that further site allocations are needed to provide a source of supply for delivery over the remaining plan period, and critically for the next 5 years.</p> <p>Pineapple Farm is a sustainable site which is suitable for development of in the region of 120 dwellings. It is available now and can contribute to the 5-year housing land supply shortfall. The previous reason for dismissing the progression of the site is not sound, is further reduced by the recent permission bordering to the south and has been shown to be inconsistent with other developments in the locale.</p> <p>We would be pleased to provide any further information and would welcome the opportunity to discuss the site in more detail. We also request to be kept informed of any updates to the examination process, including the opportunity to make verbal representations at hearing should it arise on behalf of our client.</p>	
Mr Hardwick & Mrs Cooksley	17925761//1	<p>Sites and Policies Plan Part 2: Site Allocations Plan: Main Modifications Consultation – Land at Plummers Hill, Easton-in-Gordano, North Somerset</p> <p>Town and Country Planning Act (Local Planning) (England) Regulations 2012</p>	 Plummers Hill.pdf (1.4 MB)

Respondent Name	Comment ID	Comment	Attached documents
		<p>We write on behalf of Mr Hardwick & Mrs Cooksley (hereafter referred to as the landowners) to make representations to the Proposed Main Modifications to the Sites and Policies Plan Part 2: Site Allocations Plan (SAP) prepared by North Somerset Council (the Council).</p> <p>The landowners have a parcel of land at Plummers Hill, Easton-in-Gordano (the site) which sits in close proximity to Junction 19 of the M5 motorway and is directly adjacent to the service station in this location. A site location plan is appended to this letter.</p> <p>APPENDIX 1: SITE LOCATION PLAN</p> <p>Introduction</p> <p>The site, although located within the North Somerset Green Belt, makes only a limited contribution to its original reasons for designation as we will expand upon within the remainder of this letter. Whilst the starting point for the Council was to consider how it might deliver up to 2,500 houses within the existing policy framework, it is readily apparent from the Council's work and chosen approach that this hasn't been possible and therefore consideration should be given for a wider approach as we advocate later within these representations.</p> <p>These representations expand upon representations made previously in respect of the SAP. Accordingly, these representations consider the following issues:</p> <ul style="list-style-type: none"> ? Background to SAP Examination; ? Additional Site Selection; 	

Respondent Name	Comment ID	Comment	Attached documents
		<p>? Deliverability of Identified Sites;</p> <p>? Paragraph 14 – Plan Making;</p> <p>? MM1 – Policy SA1 and supporting text; and</p> <p>? Land at Plummers Hill, Easton-in-Gordano.</p> <p>Background</p> <p>The Council submitted the SAP for examination on 24th February 2017. The SAP underwent examination by the Planning Inspectorate from 16-18 May 2017. Following the close of the hearings the Inspector (Ms Wendy Burden) wrote to the Council on 26th June 2017 setting out further work that she considered necessary in relation to the delivery of housing.</p> <p>To secure the delivery of Core Strategy (CS) Policy CS13, the Inspector considered the need for the Council to test the provision of additional sites for up to 2,500 homes within the SAP. Specifically, she noted:</p> <p>? “The additional sites for up to 2,500 dwellings are not a proposal to increase the overall housing target identified in Policy CS13.</p> <p>? The identification of additional sites would help to provide flexibility and certainty that the CS housing requirement can be met since:</p>	

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		<p>o Due to constraints on sites allocated in the SAP it is not certain that they will be developed by 2026;</p> <p>o Additional sites are required to make up for those which are unlikely to be delivered.</p> <p>? The increased choice and flexibility provided by additional allocations in the SAP would assist the Council in demonstrating that they have a five-year housing land supply.”</p> <p>The Inspector made other conclusions regarding the application of the Sedgefield methodology and appropriateness of a 20% buffer for persistent under delivery which are of relevance.</p> <p>All the above point to the Inspector’s concerns that the sites identified within the submitted SAP draft are heavily constrained and additional sites, up to 2,500 new homes, should be considered to ensure there is sufficient choice and flexibility.</p> <p>Within the letter the Inspector also notes that the Council has agreed to test three areas for additional allocations:</p> <ul style="list-style-type: none"> • “Sites which are broadly consistent with the Core Strategy spatial strategy (sites within or adjacent to Weston, the towns and service villages, but not infill villages, countryside or Green Belt). • Sites which have been considered through the SAP examination process. • Sites which are in the development pipeline – as these are more likely to be deliverable and could potentially contribute to 5- year supply.” 	

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		<p>It is important to note that the above parameters are the starting point against which the identification of additional sites was to be made. Clearly in the eventuality where the additional sites found are not sufficient to identify the existing shortfall and to the address the Inspector’s wider concerns regarding flexibility and choice then a wider search may well be justified.</p> <p>Additional Site Selection</p> <p>It is clear from the discussion above that the thrust of the Inspector’s comments were to consider potential additional sites for up to 2,500 additional units. However, the Council’s approach as outlined within paragraph 3 of their letter to the Inspector dated 26th June 2017 the Council considered it necessary to create a “clear cut-off”. We consider this was a fundamentally flawed approach as it restricted the range of options that could potentially be considered by the Council to only those already within the system (i.e. live application or pre-application). We consider that the Council should have made a formal call for sites at that point so as to allow a wider range of sites to be considered.</p> <p>The Council could have then proceeded with an initial sift which would have excluded any sites which had been submitted which weren’t “broadly consistent with the Core Strategy spatial strategy.”</p> <p>From this point the Council then applied an initial sift to those sites within the system and automatically excluded any sites which were the subject of an appeal and sites contrary to the Core Strategy Framework.</p> <p>As a result of this constrained assessment methodology, the phase 2 assessment contained options which allowed for a potential additional 1,812 new homes across 28</p>	

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		<p>sites. This figure is clearly significantly short of the 2,500 figure which the Inspector asked the Council to consider.</p> <p>The reassessment work culminated in a reduction of 6 sites from the 28 and a recommendation to allocate the remainder which would boost the allocation total by an additional 821 dwellings.</p> <p>Whilst we have concerns regarding the Council's Site Assessment process it is reasonable to assume that given the Council has only been able to identify only 821 dwellings, the Council should now consider options and a methodology with a much broader scope, even if this means it has to undertake a fuller review of its housing supply options.</p> <p>MM1 – Policy SA1 and supporting text</p> <p>Table 1 of the October 2016 Publication Version SAP sets out the projected housing delivery across the plan period, comprised of completions, allocations, sites with planning permission and a windfall allowance, and is supported by a spreadsheet, referred to as CD1a, showing the projected annual delivery of these sites.</p> <p>Whilst the identified supply figure of 21,051 homes, if deliverable, meets the Core Strategy OAN, it does not meet the total plan period requirement when the under-delivery to date and a 20% buffer over the next five-years are applied in line with the Inspector's recommendations. Indeed, with reference to our table below, when the past shortfall and the buffer are included the overall housing need across the plan period rises to 23,616.</p>	


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		<p>It is for this reason, together with some uncertainty about the deliverability of the sites already identified (most notably the delivery trajectories advocated by the Council at Weston Villages strategic allocation), that the Inspector considered that additional land should be allocated for a further 2,500 homes through the Main Modifications process.</p> <p>However, the Council has as noted above only found additional land for 821 new homes.</p> <p>SEE ATTACHMENT FOR FULL TABLES AND APPENDICES</p> <p>As shown in row H of the table, the result of this failure to respond to the Inspector's request means that the identified supply in the SAP for the remaining plan period remains well below the actual requirement, undermining the delivery of the Core Strategy to 2026.</p> <p>In fact, due to a revised "lapse-rate"¹ and review of the rate of delivery of existing sites ('commitments'), the identified supply for the remaining plan period has actually shrunk from 13,849 to 13,438. The shortfall is therefore 1,331 dwellings.</p> <p>Critically, the Main Modifications also fail to address the uncertain deliverability of the plan in the short term, over the next five years. The supporting annual trajectory has been updated and is referred to as CD4a. Although all of the new allocation sites found for the additional 821 homes are projected to be delivered within the next five years, this document shows a total 5-year supply of 9,149 homes, and therefore that there is still not enough housing to meet the authority's five-year housing need of 9,524. The failure of the Main Modifications and supporting evidence to demonstrate a five-year housing land supply renders the SAP unsound.</p> <p>Deliverability of Identified Sites</p>	

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		<p>For the purposes of simplicity in comparing the SAP identified housing supply with the Inspector's request, the above discussion assumes that the Council's housing trajectory is reliable.</p> <p>However, whilst the projected supply of 9,149 homes versus our identified need of 9,524 equates to a 4.8 year housing land supply, our view is that this is not a wholly accurate figure because the trajectory is over-optimistic.</p> <p>We agree with other representations, including that made by Neil Tiley of Pegasus Group (Hearing Statement ref. HS-2-1a) in the examination hearings, that the deliverable supply from existing commitments and originally identified site allocations is less than identified by the Council due to a combination of site-specific constraints and unachievable projected build-out rates on strategic sites.</p> <p>'Paragraph 14' Plan-Making</p> <p>For these reasons, more work needs to be done to identify further sites which are available, suitable and deliverable over the next five years and the remainder of the plan period to meet the identified housing requirement.</p> <p>The 'Presumption in Favour of Sustainable Development' established in paragraph 14 of the NPPF should be seen as the 'golden thread' in the planning process:</p> <p>"For plan-making this means that:</p> <p>? Local planning authorities should positively seek opportunities to meet the development needs of their area;</p>	

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		<p>? Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or –</p> <p style="padding-left: 40px;">specific policies in this Framework indicate development should be restricted.”</p> <p>Land at Plummer’s Hill, Easton-in-Gordano</p> <p>Pegasus made representations on this site in August 2017 and a copy of these representations are appended to this statement at Appendix 2:</p> <p>APPENDIX 2 – PEGASUS REPRESENTATIONS 17/08/2017</p> <p>The land that is the subject to this letter, in association with adjoining land between the urban edge of Easton in Gordano and the M5 motorway presents a very strong option for addressing the issues highlight by the Inspector in ID/4.</p> <p>The site forms a relatively small pocket of land to the west of Pill through to Junction 19 of the M5 motorway. Land directly to the north on the opposite side of the motorway sits beyond the Green Belt designation and is largely land associated with the Dock.</p> <p>The effect of the M5 motorway and the service station at Junction 19 influences the strength of the Green Belt in this location.</p> <p>The land is identified as falling within cell 77a of the West of England Stage 2 Green Belt Assessment (November 2016) and is assessed by the authorities in relation to the 5 Green Belt purposes as set out below:</p>	

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		<p>1. Checking the unrestricted sprawl - Limited Contribution</p> <p>Small area of land contained by the built-up area of Eastern in Gordano, motorway and motorway service station, development would therefore not increase the perception of sprawl.</p> <p>2. Preventing neighbouring towns merging into one another – Limited Contribution</p> <p>A small area of land between the port and Eastern in Gordano, this land is separated from the port by the motorway – currently play a limited role in separation given the presence of the motorway service station.</p> <p>3. Assisting in safeguarding the countryside from encroachment – Limited Contribution</p> <p>Large proportion of site given over to motorway service station, some limited agricultural land and woodland. Cut off from wider countryside by the motorway, built development and the A369. Therefore, plays a limited role in assisting the safeguarding the countryside from encroachment.</p> <p>4. Preserving the setting and character of historic towns - No contribution</p> <p>5. Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land – Limited Contribution</p> <p>The cell has played a role in checking the unrestricted sprawl of the nearby urban area however the construction of the M5 and the built-up area of Pill has created a more defensible boundary close to the urban area and resulted in a small area of land which is cut off from the wider countryside.</p>	

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		<p>Accordingly, it can be said that the Stage 2 Green Belt assessment does not rate the Green Belt in this location very highly.</p> <p>With this conclusion in mind, it seems logical to assume that where the Council has been unable to get close to the 2,500 additional dwellings that the Inspector requested be sought, then the next logical step would be to consider an approach with a wider cope.</p> <p>Such an approach could and probably should include a fundamental review of the North Somerset Green Belt with a view to a release of sites which, like the site at Plummers Hill, makes only a limited contribution to the original designation.</p> <p>Conclusion</p> <p>We report that the Main Modification MM1 to policy SA1 and supporting text of the SAP fails to adequately address the housing need and that further site allocations are needed to provide a source of supply for delivery over the remaining plan period, and critically for the next 5 years.</p> <p>Whilst the site at Plummers Hill has not previously been considered by the Council due to its location within the Green Belt. It is clear from the work progressed by the Council that they will fall significantly short of finding sites sufficient to contribute to the 2,500 envisaged by the Inspector as such a more fundamental review of suitable residential land is required. The site at Plummers Hill makes only a very limited contribution to the purposes of Green Belt designation. Accordingly, this and other sites should be released to help boost the supply of housing within North Somerset.</p> <p>We would be pleased to provide any further information and would welcome the opportunity to discuss the site in more detail. We also request to be kept informed of</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>any updates to the examination process, including the opportunity to make verbal representations at hearing should it arise on behalf of our client.</p> <p>SEE ATTACHMENT FOR TABLES AND APPENDICES</p>	
Newland Homes	17925921//1	<p>Claverham Works, Bishops Road, Claverham, BS49 4NF</p> <p>Sites and Policies Plan, Part 2: Site Allocations Plan – Main Modifications Consultation Town and Country Planning Act (Local Planning) (England) Regulations 2012</p> <p>Introduction and Background</p> <p>We write on behalf of our client, Newland Homes, to make representations to the Proposed Main Modifications to the Sites and Policies Plan Part 2: Site Allocations Plan (SAP) prepared by North Somerset Council.</p> <p>The SAP underwent examination by the Planning Inspectorate from 16-18 May 2017. Following the close of the hearings the Inspector wrote to the council setting out further work that she considered necessary to identify additional housing sites to make sure the council can meet its housing requirement over the plan period. The council have undertaken further work, and at Executive Committee on 5 September 2017 an additional 22 sites were approved for inclusion in the plan.</p> <p>The basis of this representation is that the additional land identified is still not sufficient to enable North Somerset Council to be able to demonstrate a five-year housing land</p>	 Newland.pdf (694 KB)

Respondent Name	Comment ID	Comment	Attached documents
		<p>supply, rendering the SAP unsound. For this reason, additional sites need to be considered for allocation within the plan totalling 1,331 dwellings.</p> <p>The land known as ‘Claverham Works’ in Claverham could accommodate in the region of 100 dwellings. The brownfield site was not previously submitted through the ‘call for sites’ as it was in use. It is being promoted by our client for residential use following the closure of Claverham Ltd. (owned by Aerospace Systems) which previously occupied the site.</p> <p>The latter part of the representation will set out why the residential development of the site represents sustainable development and should be included in the SAP to contribute to the 5-year housing land supply. It will also explain why the proposed allocation of the southern part of the site, as a ‘Local Green Space’ under policy SA5 should be deleted in accordance with the emerging Neighbourhood Plan, and thus can be included for consideration for residential development.</p> <p>MM1 – Policy SA1 and supporting text</p> <p>Table 1 of the October 2016 Publication Version SAP sets out the projected housing delivery across the plan period, comprised of completions, allocations, sites with planning permission and a windfall allowance, and is supported by a spreadsheet, referred to as CD1a, showing the projected annual delivery of these sites.</p> <p>Whilst the identified supply figure of 21,051 homes, if deliverable, meets the Core Strategy OAN, it does not meet the total plan period requirement when the under-delivery to date and a 20% buffer over the next five-years are applied in line with the Inspector’s recommendations. Indeed, with reference to our table below, when the past shortfall and the buffer are included the overall housing need across the plan period rises to 23,616.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>It is for this reason, together with some uncertainty about the deliverability of the sites already identified, that the Inspector considered that additional land should be allocated for a further 2,500 homes through the Main Modifications process. However, the Council has only found additional land for 821 new homes.</p> <p>SEE ATTACHMENT FOR TABLES AND APPENDICES</p> <p>As shown in row H of the table, the result of this failure to respond to the Inspector’s request means that the identified supply in the SAP for the remaining plan period remains well below the actual requirement, undermining the delivery of the Core Strategy to 2026.</p> <p>In fact, due to a revised “lapse-rate”¹ and review of the rate of delivery of existing sites (‘commitments’), the identified supply for the remaining plan period has actually shrunk from 13,849 to 13,438. The shortfall is therefore 1,331 dwellings.</p> <p>Critically, the Main Modifications also fail to address the uncertain deliverability of the plan in the short term, over the next five years. The supporting annual trajectory has been updated and is referred to as CD4a. Although all of the new allocation sites found for the additional 821 homes are projected to be delivered within the next five years, this document shows a total 5-year supply of 9,149 homes, and therefore that there is still not enough housing to meet the authority’s five-year housing need of 9,524. The failure of the Main Modifications and supporting evidence to demonstrate a five-year housing land supply renders the SAP unsound.</p> <p>Deliverability of Identified Sites</p>	




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		<p>For the purposes of simplicity in comparing the SAP identified housing supply with the Inspector's request, the above discussion assumes that the Council's housing trajectory is reliable.</p> <p>However, whilst the projected supply of 9,149 homes versus our identified need of 9,524 equates to a 4.8 year housing land supply, our view is that this is not a wholly accurate figure because the trajectory is over-optimistic.</p> <p>We agree with other representations, including that made by Neil Tiley of Pegasus Group (Hearing Statement ref. HS-2-1a) in the examination hearings, that the deliverable supply from existing commitments and originally identified site allocations is less than identified by the Council due to a combination of site-specific constraints and unachievable projected build-out rates on strategic sites.</p> <p>'Paragraph 14' Plan-Making</p> <p>For these reasons, more work needs to be done to identify further sites which are available, suitable and deliverable over the next five years and the remainder of the plan period to meet the identified housing requirement.</p> <p>The 'Presumption in Favour of Sustainable Development' established in paragraph 14 of the NPPF should be seen as the 'golden thread' in the planning process:</p> <p>"For plan-making this means that:</p> <ul style="list-style-type: none"> • <i>Local planning authorities should positively seek opportunities to meet the development needs of their area;</i> 	

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="539 328 1568 496">• <i>Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless: – any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or – specific policies in this Framework indicate development should be restricted.</i>”</p> <p data-bbox="539 536 757 563">Claverham Works</p> <p data-bbox="539 608 1576 738">The site is located to the eastern edge of Claverham with residential properties to the west behind a belt of trees, open agricultural fields to the east/north and Court DE Wyck Primary School to the south. It is accessed from a lane off Bishops Road to the north of a tree lined drainage ditch.</p> <p data-bbox="539 783 1568 1198">The site comprises of 5.75 hectares of land containing 9,114 sqm of existing factory buildings (Class B2). The factory, operated by Claverham Ltd and owned by UTC Aerospace Systems, has been planned for closure for several years, and the completion of phased closure has now taken place. Until this time it was in active class B1 use by Claverham Works Ltd, a specialist aviation manufacturing company with contracts in the defence and industry sectors. The site did not feature in the Employment Allocation Review (March 2016), which was a background evidence document used to inform the selection process for safeguarding employment sites as it is understood the Council was aware of the intention to relocate from this site. It is also understood that given the specialist nature of the existing employment accommodation, the Council (and the Neighbourhood Plan group) appreciated that there was no realistic prospect of retaining the site in employment use.</p> <p data-bbox="539 1238 1568 1302">Indeed, marketing commenced in April 2017 including the erection of ‘for sale’ boards, Estates Gazette advertisement and e-marketing and entry on the JLL database. Only two</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>unconditional offers were made by commercial developers, but neither has been backed up by tenant interest.</p> <p>The closure of the factory therefore represents an opportunity for the development of the site, which is now proposed by our client for the erection of 102 residential dwellings. The freehold also contains a Village Hall building to the south, which is on a long-lease to the Parish Council and is not considered for development potential. A site plan together with the proposed extent of allocation is attached at Appendix 1.</p> <p>APPENDIX 1: SITE LOCATION PLAN</p> <p>The site can be described in broadly three parts; a field to the south containing the Village Hall, the factory and ancillary development (including car parking) to the central area, and a further field separated by trees to the north. The factory buildings include a Grade II Listed house, formerly in use as ancillary offices, a Grade II Listed Chapel and a stone barn. The site contains a number of existing trees and hedgerows along field boundaries and a small pond to the south-west corner. The entire site is closely connected with the existing settlement in landscape terms and has the capacity to accommodate development.</p> <p>The central part of the site is proposed to be partially allocated as Potential Development Site PS1 under policy D3 of the emerging Claverham Neighbourhood Plan. The supporting text to the policy makes clear that this allocation, whilst outside the defined settlement boundary, is supported as redevelopment for residential purposes would represent sustainable development and bring the site into “good social use”. The Neighbourhood Plan was approved by the Council to proceed to referendum on 24th October 2017.</p>	

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		<p>The southern part of the site which was previously proposed for allocation as a Local Green Space known as “May Day Field” (ref. LGS1) is no longer supported in the Neighbourhood Plan for this function. This is because for the purposes of policy ENV4, the examiner was not satisfied that the “site is demonstrably special to the local community in terms of access rights and the longevity of the community events that have taken place recently.”</p> <p>Accordingly, the site known as the ‘Grass area adjacent to Village Hall, Claverham’ should be removed from Schedule 3 of the SAP for the purposes of policy SA5. The deletion of this proposed designation would facilitate a greater quantum of residential development to come forward on the site to contribute to the 1,331 dwelling shortfall.</p> <p>The entire site is under the control of our client and is immediately available. The allocation of the whole site (less the village hall) within the SAP would represent a logical extension to Claverham and builds on the proposed Neighbourhood Plan allocation to deliver additional housing needed to meet the identified requirement. Any proposed development would retain the existing landscape features where appropriate to establish landscape buffers as set out in Neighbourhood Plan policy D3. The extension of these principles to the northern field will also ensure that the landscape impact of the development in this area will be suitably mitigated.</p> <p>Site Assessment</p> <p>Using the same methodology employed by the Council for the residential sites originally assessed for inclusion in the SAP, the table attached at Appendix 2 provides an assessment of the development of Claverham Works for 100 dwellings against the high-level and subrequirements.</p> <p>APPENDIX 2: ASSESSMENT OF THE DEVELOPMENT</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>As set out above, paragraph 14 of the NPPF requires that Local Plans should respond with sufficient flexibility to meet identified housing needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole.</p> <p>Using the traffic light system, the table shows that of the 16 sustainability criteria, the impact of the proposal is assessed as being beneficial/neutral on 8 counts (green), and of negligible impact (amber) on 7 counts. Only 1 red is given. The NPPF 'test' is therefore passed.</p> <p>Although we are promoting the allocation of the site through the plan-making process, our client has recently submitted a request for pre-application advice in respect of a proposal for 102 dwellings on the site. This submission provides further information about the nature of the proposed development and a more detailed assessment of its impact.</p> <p>Delivery of the Site</p> <p>It is likely that a planning application will be submitted in advance of the SAP concluded.</p> <p>Following grant of consent, a build-out rate of 50 units a year is envisaged. To reiterate, the site is available now, suitable for development and deliverable. The site is in single ownership and with an established vehicular access. Having assessed the site in detail, there are no known constraints that would compromise its delivery.</p> <p>Conclusion</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>The Main Modification MM1 to policy SA1 and supporting text of the SAP fail to adequately address the housing need and that further site allocations are needed to provide a source of supply for delivery over the remaining plan period, and critically for the next 5 years.</p> <p>Claverham Works is a sustainable site which is suitable for development of in the region of 100 dwellings. It is available now and can contribute to the 5-year housing land supply shortfall. We have assessed the suitability of the site using the Council's own methodology and shown it to meet the paragraph 14 'test' for inclusion in the emerging SAP.</p> <p>We would be pleased to provide any further information and would welcome the opportunity to discuss the site in more detail. We also request to be kept informed of any updates to the examination process, including the opportunity to make verbal representations at hearing should it arise on behalf of our client.</p> <p>SEE ATTACHMENT FOR APPENDICES</p>	
Hayes Family	17932193//1	<p>1.0 INTRODUCTION</p> <p>1.1 On behalf of the Hayes Family, Grass Roots Planning have been instructed to prepare and submit representations to North Somerset Council's (NSC) Main Modifications Consultation on the Sites and Policies Plan Part 2: Site Allocations Plan</p>	<p> 400_A3_MJK_CC_301017_Reps_to_Site_Allocations_Part_2_inc_Appendices_(Part_1_of_3).pdf (5.1 MB)</p> <p> 400_A3_MJK_CC_301017_Reps_to_Site_Allocations_Part_2_inc_Appendices_(Part_2_of_3).pdf (6.0 MB)</p> <p> 400_A3_MJK_CC_301017_Reps_to_Site</p>

Respondent Name	Comment ID	Comment	Attached documents
		<p>Examination. These representations primarily relate to land west of the M5, Locking, which we are currently promoting for allocation in the plan.</p> <p>1.2 The Sites and Policies Plan Part 2: Site Allocations Plan (SAP) when adopted will provide housing and employment allocations to meet the requirements of the North Somerset Core Strategy, to deliver a minimum of 20,985 dwellings over the plan period 2006 – 2026.</p> <p>1.3 Hearings were held by the Inspector in May 2017 for discussion on the delivery of housing between North Somerset Council and the development industry, and after careful consideration the Inspector confirmed in a letter on the 26th June 2017, that NSC should ‘test the allocation of additional sites within the SAP, which would have the capacity to accommodate up to 2,500 dwellings, and which have a realistic chance of being delivered by the end of the CS period in 2026’.</p> <p>1.4 The Council therefore published a list of sites and an initial assessment of each one for potential allocation; following the publication of this assessment, NSC undertook a three week consultation process between the 1st and 21st of August 2017 in which any interested party could submit comments. Land west of the M5, Locking, was included in this list of potential allocation sites and a copy of the Council’s initial site assessment can be found as Appendix C to this document.</p> <p>1.5 As part of this consultation we made representations on behalf of the applicant to promote the land for allocation for residential development in the Site Allocations Plan. This response comprised a 146 page document which responded primarily to the issues raised in the ‘Site Suitability’ part of NSC’s assessment and sought to address concerns raised regarding the suitability and deliverability of the site, including proposed mitigation to address issues identified by the Council. Relevant extracts of our response can be found in Appendix D. The submitted document included an emerging</p>	<p>Allocations Part 2 inc Appendices (Part 3 of 3).pdf (4.9 MB)</p>

Respondent Name	Comment ID	Comment	Attached documents
		<p>masterplan, archaeological desk-based assessment and letter from our ecologists and noise consultants summarising the findings of their assessments and proposed mitigation measures.</p> <p>1.6 Whilst we did not comment fully on the strategy put forward by NSC at that current time, we agreed with the points made by the Inspector in her letter dated 26th June 2017, which are as follows:</p> <p>‘Provision is made through the CS (Policies CS28, CS31, CS32) for unallocated housing schemes to come forward outside the settlement boundaries of the towns and service villages. The intention is to thus provide increased flexibility and to reduce the risk of housing undersupply. However, the scale of such schemes is restricted and without the benefit of a positive allocation in the SAP, the negotiation of planning permission could delay delivery... I consider that, in addition to this provision in the CS, further sites should be allocated in the SAP to secure delivery over the remainder of the CS period.’</p> <p>‘... if the SAP is adopted in its current form, with the higher level of uncertainty as to the deliverability of allocated sites and in particular the need for more sites that can be developed within the next five years, it would fail to deliver the CS requirement or to ensure that the Council can maintain a five year housing land supply’.</p> <p>1.7 As the Inspector already stated within her letter to the Council in June, there are serious risks to adopting the plan in its current status due to the potential that certain allocated sites will not come forward within five years or within the rest of the current development plan period. Whilst estimates of deliverability have not been agreed between the development industry and the Council, the deficit of 2,692 dwellings is acknowledged within the Statement of Common Ground between parties which shows</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>that there is a significant and serious shortfall that needs to be dealt with in the next five years, which results in crippling housing affordability.</p> <p>1.8 Issues of housing affordability are also acknowledged by the Department of Communities and Local Government's (DCLG) current consultation on the Housing White Paper, which proposes a new methodology for assessing housing need in each authority area based on a ratio of housing affordability. In relation to North Somerset, it can be seen that the indicative housing need may increase to 1,305 dwellings per annum between 2016 and 2026. Based against the current Core Strategy requirement of 1,049dpa, this is likely to result in the need to plan for an additional 256 homes per year. While there is a grace period for the implementation of any new requirement it gives a clear direction of travel in respect to the need to allocate additional sites. It is therefore important to try and rectify the existing shortfall now to improve housing affordability issues, as well as give the authority the best chance of planned supply to achieve the minimum figures of 20,985 dwellings over the remaining nine years of the Core Strategy plan period.</p> <p>1.9 On the 5th September 2017 at the Executive Committee, a report was put forward by officers of the Council, which can be summarised as follows:</p> <ul style="list-style-type: none"> • The Inspector asked the Council to test 'up to 2,500 homes' but this was never intended to be a target; • The robustness of the assumption to allocate an additional 2,500 dwellings is being questioned as this was primarily suggested by the development industry; • The recommended contingency as a result of the site assessment process is 821 dwellings; 	

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		<ul style="list-style-type: none"> • It is anticipated that all the identified 821 dwellings are expected to be delivered within 5 years – this reflects the Inspector’s priority to identify sites capable of contributing to the delivery of the five year supply; and • Furthermore, the development plan is about to be reviewed through the Joint Spatial Plan and new Local Plan, so in practice the Site Allocations Plan is not going to run its course to 2026. <p>1.10 We consider that if the Council are intending to meet five year housing land supply targets as their primary objective, the provision of an additional 821 dwellings which supposedly can come forward in the next five years would still not be sufficient (a deficit of 113 dwellings). Therefore, in the minimum, the Council ought to be allocating 934 dwellings to meet the shortfall in five year housing land supply; and this is only if the Council’s assessment is correct in deliverability – if the development industry is correct and the Council have been overly optimistic, there will still be a significant and serious deficit in five year housing land supply in the authority area over the coming years.</p> <p>1.11 In addition, the chosen additional allocations lack credibility when considered against NSC’s initial assessment. We will discuss this later in this statement.</p> <p>1.12 We therefore consider that the work undertaken by the Council and the proposals now put forward lacks credibility. As such, we consider that land west of the M5, Locking, should be allocated to help meet the serious and significant shortfall in housing delivery.</p> <p>2.0 THE SITE</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>2.1 The site consists of 5.5 hectares of land comprising two triangular parcels (a north and south parcel), that are bound by existing residential development to the west, proposed residential development to the north (the Mead Realisations site & Locking Parklands), the M5 to the east and the A371 to the south. The land was previously used for agriculture as part of a wider parcel of land but due to its reduction in size over the years, it is now too small for productive use. It is therefore currently used as a paddock for horses and rough pasture.</p> <p>SEE ATTACHMENT FOR LOCATION PLAN AND APPENDICES</p> <p>2.2 The immediate surrounding context consists of residential development (both built and currently being developed), including the approved Locking Parklands Scheme (Application Ref: 12/P/1266/OT2 and 13/P/0997/OT2), which will also provide employment land, and residential, commercial and leisure uses in the future. A separate application to the north of this site (Ref: 16/P/2744/OT2), submitted by Mead Realisations, has been approved by the Council for up to 250 residential dwellings (part of the site delineated in orange in Figure 1 above). On the other side of the M5, there are agricultural fields.</p> <p>2.3 The Grumblepill Rhyne forms the northern boundary of the site and is a local wildlife area which is designated for its diverse flora (considered to be a SNCI); however, this designation does not go beyond the watercourse and the Rhyne is currently very overgrown. There are no other designations such as an AONB, Conservation Area, or Flood Zone that applies to the site, and there are no listed buildings in close proximity to it.</p> <p>History of the Site's Assessment</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>2.4 The site has generally been assessed historically as part of a larger site which includes land to the north, beyond the Grumblepill Rhyne, which is now subject to the application put forward by Mead Realisations and granted permission at committee in February 2017 (Ref: 16/P/2744/OT2). Therefore, when referring to the SHLAA assessments below, this generally includes the land to the north, unless otherwise stated.</p> <p>2.5 The site was first assessed in the 2013 SHLAA (Ref: HS12150) but was identified as a 'site initially assessed as being locationally broadly consistent with the Core Strategy, but subsequently discounted.' The assessment goes on further to say that the site was discounted due to its 'conflict with principles and objectives for the Weston Villages Proposals'. The draft version of the Weston Villages DPD (2011) indicated that the entirety of the land should be designated as an open green space buffer to the motorway.</p> <p>2.6 The SHLAA 2014 split the site into two parcels of land, which changed the references to HE1478 & HE1486 and these sites were discounted again for the same reason.</p> <p>2.7 As part of the Site Allocations DPD consultation process (March – April 2016 consultation), and within submission document SD8, the site was assessed by the Council under reference NSC0108. This identified that the site should be discounted due to 'landscape and noise constraints, and not available within five years'. Different site assessments also indicated that the Grumblepill Rhyne may act as a constraint to the site's development.</p> <p>2.8 The land to the north of the Grumblepill Rhyne was given reference WSM1 and is now subject to the approved application 16/P/2744/OT2 for 250 dwellings; this is despite the site being allocated as a strategic open buffer between the Locking Parklands development and the motorway through the previous extant application (Ref: 12/P/</p>	

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		<p>1266/OT2). Through the Mead Realisations application process for 250 dwellings, technical work was undertaken which established that noise and landscape constraints (including the open space buffer allocation) could be overcome and this was considered acceptable by officers.</p> <p>2.9 Our site was removed from the site boundary plan during the application process for the Locking Parklands scheme (Ref: 12/P/1266/OT2), and therefore has no designation as a strategic landscape buffer.</p> <p>2.10 The northern parcel of our site was given the reference WSM8 and is included in the list of alternative sites for potential development by the Council, submitted as part of the evidence base to the Site Allocations DPD (Document SD3). The southern parcel of our site has no reference number at this time.</p> <p>2.11 Following the Inspector's letter, the Council considered the site as a potential allocation and published their assessment on the 1st August 2017 (Appendix C). The primary issues raised by NSC in respect to this site were ecology, amenity (noise), the potential for development to preclude the delivery of J21A, deliverability and archaeology. We had just 21 days to respond to this assessment and relevant extracts of our response can be found in Appendix D, which should be read in conjunction with these representations.</p> <p>2.12 Following this consultation process, NSC published their report to the Executive with the list of allocations proposed and their response to the assessment of residential sites and evidence presented by correspondents. The following comments were made in respect to land west of the M5, Locking: 'Both of these sites have significant delivery issues and neither are recommended for inclusion. The first one is adjacent to the M5 in a location where there are significant ecological, access and noise issues. It is a further extension to the Locking Parklands development and is considered unlikely to come</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>forward during the plan period particularly given the comments of other developers who have raised concerns about delivery rates across the wider Weston Villages development. It would also prejudice delivery of a future M5 J21a scheme.’</p> <p>2.13 Page 14 of the Executive Report (Appendix E) describes further the Council’s assessment of the site, but our concerns were raised relating to the decision-making process through the statement that ‘this area is subject to significant ecological, access and noise constraints, and there is no evidence that these can be mitigated against’ (our emphasis). This was profoundly concerning as we submitted a 146-page document which provided extensive technical information, including summary letters from our ecologists, a draft archaeological report, and a summary letter from our noise consultants. Furthermore, the site and the proposed development should not be considered as an extension of Locking Parklands – this assertion is incorrect as the site will be stand alone with its own separate access allowing it to be developed independently of the larger allocated area. These letters and our own evidence, alongside the emerging masterplan, explained the steps that were currently being undertaken to inform the design and mitigation for the site’s development and we considered this to be valid evidence that would inform the Council’s decision making process for the allocation of sites.</p> <p>2.14 As such, we wrote a letter to local members of the Executive Committee, prior to the committee taking place on the 5th September, describing our concerns in relation to the assessment of the site. This letter can be found at Appendix F to this document. Although this letter was discussed at the relevant committee (5th September 2017) the evidence presented was dismissed and the site excluded.</p> <p>Progress on technical work and planning application</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>2.15 We submitted a request for EIA Screening for up to 120 dwellings (Ref: 17/P/1414/EIA1) in June 2017 and on the 28th July 2017, it was confirmed that due to the expected cumulative impacts of all development in this area, in terms of highways, ecology, archaeology and flood risk, any forthcoming application for the site would need to be supported by an EIA. We followed this Screening Request with a Scoping Request which was validated on the 4th August (Ref: 17/P/2098/EIA2). Despite the five week time limit, we are still waiting to hear the results of the Scoping Request from the Council, but we anticipate that the EIA will require chapters on highways, flood risk and drainage, ecology and archaeology (which were highlighted as important for assessment in the Screening Request).</p> <p>2.16 Since our consultation response was submitted in August 2017 to NSC, public consultation letters were issued to local residents in the area describing a summary of the site and the technical work being undertaken to support the application, as well as an emerging masterplan. These letters were delivered to nearly 250 residents, and sent to the two ward members of Hutton and Locking. We also sent a letter and copies of the masterplan to Locking Parish Council and offered a meeting with them to discuss the proposals.</p> <p>2.17 We have been progressing the outline application with supporting technical advice and information, and these draft/finalised reports are provided alongside our representations in Appendix G.</p> <p>2.18 Therefore our submitted response in August 2017 which included technical work that had been undertaken at that time, in conjunction with these representations which include further technical reports to demonstrate our progress towards an application, shows that we have adequately addressed the Council's concerns in relation to the development of the site and responded to the assessment that they produced as fully as possible given the time constraints.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>2.19 We are anticipating submitting an application in late 2017 and this will take the form of an outline application with all matters reserved bar access. It will be supported by an Environmental Impact Assessment.</p> <p>3.0 THE NUMBER OF ADDITIONAL ALLOCATIONS TO BE MADE</p> <p>3.1 We have carefully considered the Inspector’s letter (26th June 2017), the Council’s interim response (20th July 2017), and the Executive Committee Report (5th September 2017) in relation to the proposed number of additional allocations required in the Site Allocations Plan.</p> <p>3.2 We share the Inspector’s concern that the plan could be adopted without a five year housing land supply in place, which is a critical issue, and that North Somerset will continue to be unable to deliver the required housing targets resulting in a more significant shortfall than what is already evidenced, and worsening affordability in the area. The secondary concern is that a number of allocations will not come to fruition at all in the remaining years of the development plan period (2017 – 2026).</p> <p>3.3 As the Council have stated on numerous occasions the purpose of the SAP is ‘to identify the new residential allocations necessary to deliver the CS requirement, taking into account the need to supply deliverable sites to ensure the Council can maintain a 5 year housing land supply’ [Document ID1].</p> <p>3.4 The note published by NSC on the 5th September 2017 reinforces this approach and states that they will ‘prioritise the identification of sites which contribute to five year supply. The disagreement with the development industry was about sites which would have certainty of delivery within 5 years. There was very little dispute over whether sites would come forward within the plan period – the issue was not about suitability, it</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>was about delivery. In which case, the focus should be to address the 5 year supply position, particularly as the plan is being immediately reviewed’.</p> <p>3.5 The priority therefore, and current objective of the Site Allocations Plan, is to meet the five year supply requirements, which in turn will provide additional land should the original allocations in the last four years of the plan period not come to fruition (i.e. between 2022 – 2026).</p> <p>3.6 The five year housing land supply requirement is 9,524 dwellings. This has been agreed by the Inspector, the Council and the development industry.</p> <p>3.7 Based against the Council’s estimate of deliverable supply this equates to:</p> <p>5 year requirement + shortfall + 20% = 9524 Annual requirement = 1905 Council's estimate of delivery = 8590 Shortfall = -934 5YHLS = 4.5 years</p> <p>3.8 Regardless of the development industry’s position, the Council should be seeking to allocate in the minimum 934 dwellings. By allocating 821, they still would be unable to demonstrate a five year housing land supply by their own estimates.</p> <p>5 year requirement + shortfall + 20% = 9524 Annual requirement = 1905 Council's estimate of delivery = 9411 Shortfall = -113 5YHLS = 4.9 years</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>3.9 The Council estimates the deliverable supply to be 9,411 dwellings, which is highly optimistic given the fact that this amounts to more housing being delivered in the next five years than has so far been completed since 2006.</p> <p>3.10 With consideration of the development industry's figures, which estimates 5,665 units to come forward in the next five years and has been considered to be a more realistic assumption by the Inspector, this reduces the 5YHLS to the following:</p> <p>5 year requirement + shortfall + 20% = 9524 Annual requirement = 1905 Council's estimate of delivery = 5665 Shortfall = -3859 5YHLS = 2.97 years</p> <p>3.11 Even with the provision of an additional 821 dwellings, this would only increase the 5YHLS marginally, based on the development industry's estimates.</p> <p>3.12 As such, we consider that in the minimum the Council should be allocating 934 dwellings to meet 5YHLS requirements (an additional 113 dwellings) by their own estimates, but given the numerous appeals which have come forward in the previous years which have all estimated NSC's supply at between 2.3 and 3.7 years, and at the Inspector's behest, which requested they at least consider the 'provision of up to 2,500 additional houses in order to identify the environmental costs of allocating a wider choice of housing sites', the Council should at least demonstrate that they have considered all available options including the provision of the higher number of additional dwellings and the potential issues associated with this. In our view the Council have not demonstrated that the provision of 2,500 additional dwellings would cause serious environmental costs, which was requested in paragraph 22 in the Inspector's letter.</p>	

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		<p>3.13 Furthermore, if the development industry is correct, and the estimated levels of delivery are approximately 5,665 dwellings over the next five years, then the Council will have an even worse shortfall than what is currently evidenced and it would be prudent to act now to rectify this issue through the plan-led system as soon as possible, through as many credible site allocations as possible. It is clear from the Inspector's letter that she considers many of the sites to be undeliverable or unsuitable and would not have asked NSC to consider the provision of an additional 2,500 dwellings unless gravely concerned over the potential level of delivery here.</p> <p>3.14 In addition, DCLG's consultation on standardising housing methodology indicates housing need between 2016 – 2026 to be 1,305 dwellings per annum between 2016 and 2026, based on the proposed new formula. Whilst the most up-to-date assessment on housing need by North Somerset is not available at the current time, based on the Core Strategy requirements this increases by 256 dwellings per annum. It therefore would be prudent of the Council to allocate as many additional sites now, so that when the Local Plan Review takes place in 2018 a large proportion of the work has already been undertaken to underpin the evidence base for the allocation of sites.</p> <p>3.15 By all means, the Council could abandon the Site Allocations Plan and wait for the production of the new Local Plan (similar to South Gloucestershire Council) but they must then accept that they do not have a five year housing land supply and look upon applications for housing on the edge of a settlement boundary in light of the presumption in favour of sustainable development and apply the latter parts of paragraph 14 of the NPPF namely, by approving development unless 'any adverse impacts of doing so would significantly and demonstrably outweigh the benefits'.</p> <p>3.16 The additional provision of credible allocations is important for the Council to meet the 5YHLS requirements as well as meeting Policy CS13's requirement to provide a minimum of 20,985 dwellings over the plan period. A lack of credible allocations has</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>resulted in a slippage in housing delivery and therefore it is important to rectify this issue as soon as practically possible.</p> <p>4.0 SUITABILITY OF ADDITIONAL SITES</p> <p>4.1 We will now also bring the Inspector’s attention to the assessment of allocated sites, consistency in decision making by NSC and how the Council came to the opinion that land west of the M5 should not be allocated, when other, less suitable sites have been put forward in the Site Allocations Plan. However, as we have set out in previous sections of this statement, we consider that the Council ought to be considering allocating more sites in order to meet 5YHLS targets and this should be done irrespective of delivery concerns.</p> <p>4.2 The sites we have some concerns with regarding their suitability and the level of evidence provided are as follows:</p> <p>Queensway, Weston-super-Mare (35)</p> <p>4.3 A pre-application was put forward in 2016 but there has been no progression to an application since this time. The site would involve the loss of football pitches, which would be against local planning policy. Unless the Council can find suitable replacement pitches in close proximity which is under their ownership, an application for this site should not be granted permission and therefore may not be a credible allocation.</p> <p>Weston College, Weston-super-Mare (28)</p> <p>4.4 An application was submitted for this site in April 2015 and still hasn’t been approved. This is due to ‘ownership issues’ with the freehold of the site, which is</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>considered to ‘unlikely be addressed in the short term’, according to the initial site assessment undertaken by NSC. Bearing this in mind, when the Inspector has asked for sites that can be delivered within the CS period, and the Council want sites to be delivered within 5 years, we would question whether this site is deliverable and capable of contributing towards the 5yr HLS.</p> <p>F Sweeting & Sons, Station Road, Sandford (16)</p> <p>4.5 The site is separated from the main village of Sandford and there are issues in relation to the impact on the AONB, ecology and flood risk. Part of the site lies within Flood Zone 3. The site assessment raises concern that residents would be too heavily reliant on the car, as well as increased concerns over highways and access safety. D&E Highways & Transport commented on the most recent application 17/P/0606/O that they would be minded to recommend refusal on the grounds of pedestrian accessibility being inadequate and that there would potentially be insufficient visibility splays.</p> <p>4.6 In addition to this, there have been two previous applications on this site (Application Ref: 13/P/2397/F and 15/P/2128/F) both of which have raised concerns regarding the access point. The current application (Ref: 17/P/0606/O) was withdrawn as of the 25th October 2017 and therefore we are concerned regarding the deliverability of this site.</p> <p>Land at Shipham Lane, Winscombe</p> <p>4.7 A pre-application was undertaken in 2015 although there is no record of the outcome of this available on the Council’s website, and there has been no formal application for development here at the current time, similar to land west of the M5. Part of the site lies within the AONB, which is protected under national planning policy.</p>	

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		<p>4.8 According to the assessment by officers there are potential issues related to ecology in terms of hedgerows and bat foraging but these can be 'adequately addressed via mitigation'. As there is no formal application for land at Shipham Lane, this decision must have been informed by some other form of evidence provided by the owners or applicants that is not publicly accessible, however there is no certainty of this.</p> <p>4.9 If evidence has not been provided at the consultation stage in August 2017 which demonstrated that adequate mitigation could be put forward, the decision to allocate this site is not consistent with how our client's land was assessed. Our response to the site assessment provided an initial ecological appraisal and a masterplan that has been informed by the constraints, demonstrating that adequate mitigation has been proposed here and as such the report to the Executive should have considered this mitigation and removed the issues associated with ecology as they have done with Shipham Lane.</p> <p>4.10 Furthermore, there appears to also be potential issues with access into the site and mitigation has not been proposed so far to address this issue to provide certainty that the site is deliverable.</p> <p>Broadleaze Farm, Winscombe (74)</p> <p>4.11 There are a number of issues associated with this allocation and which have been highlighted through the submission of a planning application for this site (Application Ref: 16/P/2795/O). These include issues in relation to flood risk, ecology, impact on the AONB, impact on heritage assets, and a high probability of the site being the best and most versatile agricultural land - the loss of which would be contrary to national planning policy.</p> <p>4.12 The application has received a high level of objection and is considered to be very controversial; further to this, there are access issues and there may be amenity issues for</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="539 328 1559 392">new residents in terms of the salt depot being located next door. Therefore we consider that this site cannot be considered to be deliverable at this stage.</p> <p data-bbox="539 432 965 464">Land at Cox's Green, Wrington (28)</p> <p data-bbox="539 504 1574 847">4.13 There is an appeal currently progressing on this site for non-determination for a larger proposal; through the process the Council have stated that they would have refused the application on grounds of a negative impact on the character of the settlement and harm to the landscape setting. Proposals for a smaller level of development have been submitted but the assessment undertaken by officers which considered this small level of development still raised technical issues such as impact on the AONB, highways access, and the site being somewhat detached from the main residential area of Wrington. In light of this we fail to see how the proposed allocation is reasonable, nor the site deliverable, given the previous conclusions reached by NSC officers.</p> <p data-bbox="539 887 1173 919">Land at Wilson's Garden, Scot Elm Drive, WSM (51)</p> <p data-bbox="539 959 1570 1198">4.14 The site lies within Flood Zone 3a which national policy dictates that development for residential use should be steered away from if land outside of the flood plain is available. While we acknowledge that it is inevitable that sites within flood zone 3a will be required in order to meet NSC's housing requirements, and in fact many of the sites put forward fall within this zone, sites outside should be exhausted first. Our clients land lies in flood zone 1 and is therefore preferable in sequential terms to this site, this consideration should have weighed heavily in its favour of allocation.</p> <p data-bbox="539 1238 1574 1334">4.15 Other issues in relation to archaeology and ecology have been raised but again the Council considers that this does not have an 'insurmountable constraint on development potential'. This raises concerns regarding the consistency of decision making in terms of</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>allocating residential sites when the evidence submitted with our previous representations demonstrated that adequate mitigation could be provided.</p> <p>4.16 Furthermore, the proposed site is meant to be retained for employment uses in Weston-super- Mare and currently has consent for this use; given policy CS20's aims that development at Weston villages should be employment-led, the allocation of this site for residential use would appear to conflict with the core strategy's aims.</p> <p>Land at Youngwood Lane, Nailsea (170)</p> <p>4.17 NSC's own site assessment states the following: 'Avoid allocating site through the SAP as a standalone allocation and consider in due course through the Local Plan if the southwest of Nailsea is confirmed as a location for strategic growth in the JSP'.</p> <p>4.18 The Council have then go on to allocate the site, despite it requiring 'strategic transport mitigation ... the allocation of this site in the SAP is considered premature and potentially detrimental to the forward planning of this area'. The Council's reasoning for allocating 170 dwellings here is that development on the northern part of the site could be a first phase. However, this prejudices a planning application that has yet to be determined by the Council, an allocation that has not been tested at examination in the Joint Strategic Plan and precludes a comprehensive development coming forward.</p> <p>4.19 As such, we consider that it would be premature to allocate this site now as correctly identified by officers originally and should be removed and considered in the New Local Plan if the JSP confirms this as a strategic location.</p> <p>Land South of Bristol Road, Churchill (41)</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>4.20 The allocation of this site again shows the inconsistency of decision making by NSC with the consideration of these sites and our own site west of the M5. The original assessment states ‘the site is located in very close proximity to an area identified for possible new strategic transport intervention. Pending the progression of that work as part of the JSP / JTP there is significant potential for this development to prejudice the effective planning of that infrastructure.’ This is recorded in the site assessment undertaken by officers.</p> <p>4.21 The report to the Executive then states the following:</p> <p>‘There is still considerable uncertainty as to the form of the new garden village proposal for the Churchill area and particularly the highway requirements emerging through the Joint Transport Study. The A38 is identified as a key strategic corridor linking the airport with Bristol, the M5 and Weston-Super-Mare and the junction adjacent to this site will be a critical location. It is premature at this stage to allocate development in such close proximity to a key strategic junction before highway scheme option appraisal work has been carried out as this would fundamentally compromise our ability to deliver a scheme as identified in the emerging Joint Transport study work. However, in light of the pressure to find housing sites, it is recommended that a revised site boundary be put forward for inclusion in the Site Allocations Plan... this may reduce the overall number of units that could be delivered here.’</p> <p>4.22 In our opinion, there had been no further credible evidence put forward to suggest why this site was put forward for allocation other than due to the pressure for housing sites to be found. This does not meet the requirements of the plan-led system to allocate the best sites for development.</p> <p>4.23 The assessment highlights that there may be strategic level transport infrastructure improvements required in this area, but in this instance the site was allocated and not</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>considered to preclude this infrastructure coming forward, whereas land west of the M5 was considered to preclude the potential delivery of Junction 21A although we provided evidence to the contrary (Appendix D), that demonstrated there would be sufficient land to develop the site and still develop J21A. Furthermore, we highlighted that the current stage of the JSP/JTP means that feasibility and access studies have not yet been undertaken and this should not preclude housing development coming forward now when no preferred options have been put forward and there is no tangible evidence to demonstrate that the development of J21A would impact the site. An application for housing could not be refused on the grounds of prematurity given the early stages of the Joint Transport Plan.</p> <p>4.24 Therefore, whilst we do not suggest the removal of land south of Bristol Road, there is clearly a lack of consistency in decision making by NSC particularly as we provided a large level of evidence to show that the development of the site would not preclude J21A coming forward. How land south of Bristol Road was allocated despite this factor but land west of the M5 was not remains unclear.</p> <p>Comparison of Alternatives</p> <p>4.25 The above selection of sites and analysis highlights the rushed and inconsistent nature of decision making at NSC which has led to further unsuitable allocations being put forward in the SAP that lack credibility and ignore viable alternative options.</p> <p>4.26 Following on from our original response provided in Appendix D, please see the table below which gives weighted scores to the site assessments provided by NSC. The sites allocated are in orange.</p> <p>SEE ATTACHMENT FOR FULL TABLE</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>4.27 This shows that land west of the M5 scores more highly than a significant number of allocations put forward in the SAP and it seems that officers are ignoring their own assessments of sites.</p> <p>4.28 Whilst it is our opinion that the overall numbers should increase by a minimum of 113 dwellings to meet 5YHLS issues, we also have concerns regarding the credibility and choice of sites put forward to supplement the existing proposed allocations in the plan to assuage the Inspector's concerns.</p> <p>4.29 We provided a significant level of detail in terms of the work and mitigation we would be proposing to develop our client's site and as such, we consider that it is a credible option on the edge of the Weston Villages which should be allocated in the plan. To suggest that 'no evidence of mitigation has been put forward' is concerning and indicates to us that the Council have not considered our representations submitted in August 2017 properly, which given the time allowed for consultation and then review of the responses received is hardly surprising.</p> <p>5.0 LAND WEST OF THE M5, LOCKING</p> <p>5.1 The primary issues raised during the initial site assessment response were ecology, archaeology, noise, and the preclusion of J21A being delivered. We responded to these issues with a large level of evidence beyond what would normally be expected to make an informed decision regarding an allocation in a plan. Relevant extracts of these reps are provided in Appendix D, as already stated.</p> <p>5.2 Following this, the Council then raised access as an issue, which we had not responded to previously as we were unaware that they considered this to be a problem. We therefore wrote to members of the Executive committee and provided them with the</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>access plan drawn up by our consultants, PFA, as well as sending a copy direct to planning policy officers. Details of this can be found in Appendix F.</p> <p>5.3 We now present in relevant appendices the documentation that will be used to support a forthcoming planning application to include an EIA at the beginning of November 2017. This includes a draft ecological report with bat surveys, archaeological report, landscape and visual impact assessment, and noise report. The masterplan has been informed by these technical studies and is provided in Appendix B. This incorporates the following measures:</p> <ul style="list-style-type: none"> • A 10m buffer has been provided from the Rhynes along the northern and eastern boundary of the northern parcel of the site in line with recommendations from the ecology consultants; • This also meets the requirements for a maintenance strip of 9m requested by the Internal Drainage Board; • There has been a 15m buffer provided to the identified badger sett in the northwestern corner; • Two landscape bunds have been provided in both parcels of land to provide acoustic screening to new residents from noise arising from the M5 – this is similar mitigation to that provided to make the Mead Realisations application to the north acceptable to NSC; • Access has been provided from the A371 and therefore no access will be required through the existing Locking Parklands development; • Pedestrian/cyclist modes have been provided going into Parkes Avenue for better connectivity; 	

Respondent Name	Comment ID	Comment	Attached documents
		<ul style="list-style-type: none"> • Important trees and TPOs have been retained and where these may be lost adequate replacement trees have been provided within the masterplan; and • Adequate drainage has been provided on site. <p>5.4 The mitigation proposed on the site is extremely similar to the development proposals for the Mead Realisations application (Ref: 16/P/2744/OT2) and this was found favourable and acceptable by the Council.</p> <p>5.5 The submission made in August, combined with the additional work now contained in Appendix G clearly establishes that the Council's conclusions in respect to negative impacts of the development were unfounded, namely:</p> <ul style="list-style-type: none"> • That the area is subject to significant ecological, access and noise constraints - we have demonstrated during the representations submitted in August 2017 that adequate mitigation can be provided and designed into the master planning process and which has been reiterated above, such as the incorporation of a noise bund and acoustic screening, provision of a sufficient buffer from the Grumblepill Rhyne and replacement habitat provided, and access provided from the A371; • That the development of this site could preclude the delivery of J21A – we demonstrated within our previous representations that there would be sufficient land for the development of a new junction which is of the same size as the existing J21 further north and furthermore, any application for the site cannot be prejudiced on something that has not been defined properly in a plan such as the emerging JSP; • That the site is not deliverable within five years – the site is proposed to be accessed separately via a junction from the A371, not through the Locking Parklands 	

Respondent Name	Comment ID	Comment	Attached documents
		<p>development and no other significant infrastructure is needed. Therefore there is no reason why the development could not come forward in the next five years; and</p> <ul style="list-style-type: none"> • That whilst the site has been subject to a screening request no further details have been submitted – we submitted a Scoping Request in September 2017 and we would advocate that the representations submitted which included evidence from technical consultants in August provides sufficient further detail that the Council should be looking for to demonstrate that a site is viable. <p>5.6 We therefore consider that we have met the Council’s concerns over the deliverability and suitability of the site and it is currently been ignored as a viable option, and should be allocated for development in the SAP.</p> <p>6.0 CONCLUSION</p> <p>6.1 As we have set out in the preceding sections of this statement, we have a number of concerns relating to the process, consistency in decision-making and selection of sites by North Somerset Council for the additional site allocations put forward in the Site Allocations Plan.</p> <p>6.2 In particular, NSC seems to have ignored the Inspector’s request to consider the allocation of sites capable of accommodating a further 2,500 dwellings and has instead focused on the need to demonstrate a five year housing land supply. However the provision of 821 dwellings does not even meet the minimum deficit in five year housing supply based on their own figures.</p> <p>6.3 In order to meet this bare minimum alone a further 113 dwellings need to be allocated for the authority to demonstrate a 5YHLS, based on their own estimates. What is more concerning is that the number of appeals in recent years has demonstrated that</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>the estimates of deliverability by the Council are generally overly-optimistic and a more conservative approach undertaken by the development industry results in only 5,665 dwellings being delivered in the next five years. These estimates have been given far more credibility by the Inspector for good reason and we are sure that she would not ask the Council to consider the additional provision of 2,500 homes without serious concerns over the deliverability of many sites, nor would she ask the Council to consider this issue lightly. Should the development industry be correct this will result in a crippling shortfall and worsening affordability in the area.</p> <p>6.4 The evidence provided at the previous stage of consultation and at this stage demonstrates that we have considered adequate mitigation for the site's development. The mitigation proposed is very similar to the development proposals for land to the north of this site, which was found to be acceptable by the Council.</p> <p>6.5 In addition, as the site lies on the edge of the Weston Villages it would be in accordance with the Spatial Strategy and therefore should be considered more favourably by officers as a credible option to allocate in the Site Allocations Plan. This and the provision of other additional allocations will give the Council the best chance of achieving a planned supply which will ensure choice, flexibility and competition in the market, a key requirement of the NPPF.</p> <p>6.6 Accordingly, whilst the Council have provided additional allocations this does not meet the targets for 5YHLS and there are significant concerns in relation to the consistency in decision making when comparing land to the west of the M5 and some of the sites put forward for allocation. Allocations should be decided based on the best options available now, which would normally correspond with the evidence base, in this case our client's land, which scored highly in the assessment process and has been discounted for spurious and unfounded reasons, which have been proven to be incorrect through the submission of technical details.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		As such, we respectfully request that the Inspector considers this site as a viable option to put forward in the Site Allocations Plan.	
Locking Parish Council	2627617//1	We support North Somerset Council and are pleased to see that they are protecting infill villages such as Locking from substantial development, as promised in the Adopted Core Strategy. We also consider that the 821 extra dwellings proposed by NSC adequately answers the questions posed by the Planning Inspector about adequate housing delivery – the developers arguments for much higher extra sites/numbers being wildly overstated.	
Yatton Parish Council	3322113//3	Yatton Parish Council wish to highlight that the open green spaces that are in the emerging Yatton Neighbourhood Plan should be included in the Site Allocation Plan so they are reflective of each other.	
Banwell Parish Council	3984769//1	At their meeting on the 9th October 2017 Banwell Parish Council noted the North Somerset Site Allocations Plan Proposed Modifications Consultation but remain very concerned about the potential accumulative effect of traffic on Banwell with the proposed developments in Churchill, Sandford and Winscombe.	
Portishead Town Council	4193569//9	Portishead Town Council (Minute Number 2888) - agrees with the proposals and is happy that there is no extra residential allocations for Portishead in the plan.	






Respondent Name	Comment ID	Comment	Attached documents
Taylor Wimpey UK Ltd	4599521//1	<p data-bbox="539 328 1473 392">NORTH SOMERSET SITE ALLOCATIONS PLAN EXAMINATION: MAIN MODIFICATIONS CONSULTATION</p> <p data-bbox="539 432 1563 635">This response is prepared on behalf of our client, Taylor Wimpey, in relation to the Council's latest consultation relating to the emerging Site Allocations Plan (SAP). On 5th September 2017 the Council approved the inclusion of an additional 22 sites within the emerging SAP. The Inspector appointed to examine this plan then requested that these proposed main modifications be subject to public consultation. It is this consultation to which these representations relate.</p> <p data-bbox="539 675 1563 919">Our response to this consultation is provided in this correspondence and relates to the proposed main modifications to the housing policies within the plan, and specifically to the quantum of additional housing sites considered for inclusion. Taylor Wimpey has specific interests in the land at Stowey Road, Yatton, and has previously submitted representations to earlier stages of the plan. We have also inputted into the Development Industry Consortium response submitted to this consultation and fully support the content of these separate representations.</p> <p data-bbox="539 959 1570 1233">The SAP was submitted to the Planning Inspectorate for examination on 24 February 2017, hearing sessions were held in May 2017, and following the close of hearing sessions the Inspector set out what further work on the plan was necessary, via a letter dated 26 June 2017. This letter confirms that in order to secure the delivery of the Core Strategy Policy CS13, there is a need to test the provision of additional housing sites for up to 2,500 homes within the SAP. The letter then makes the following key points setting out the context to the recommended additional work the Council needed to undertake;</p> <ul data-bbox="613 1273 1487 1342" style="list-style-type: none"> • That testing additional sites for up to 2,500 dwellings does not imply an increase the overall housing target identified in Policy CS13; and 	

Respondent Name	Comment ID	Comment	Attached documents
		<ul style="list-style-type: none"> • The identification of additional sites would help to provide flexibility and certainty that the Core Strategy Housing requirement can be met given that; • Due to constraints on the sites allocated in the SAP it is not certain that they will be developed by 2026; • Additional sites are required to make up for those which are unlikely to be delivered; and • The increased choice and flexibility provided by additional allocations in the SAP would assist the Council in demonstrating that they have a five year housing land supply. <p>In respect of five year supply, the Inspector also confirmed in this letter that it was her view that the Council was unable to demonstrate an up-to-date five year housing land supply. Paragraph 11 of her (June 2017) letter confirms that a 20% buffer should be applied to any five year supply calculation, and she also set out that there are sound reasons for considering that a number of the sites within the SAP are unlikely to come forward for development in the timescale envisaged by the Council.</p> <p>As the above short, summary demonstrates; following the Hearing Sessions the Inspector clearly instructed the Council to undertake additional work to identify sites to deliver a significant quantity (up to 2,500) of additional dwellings, which were deemed essential in order to ensure that the SAP allocates sufficient sites to fulfil its purpose of facilitating the delivery of the Core Strategy housing requirement of 20,985 dwellings over the plan period to 2026.</p> <p>At no point in her letter to the Council does the Inspector invite further discussion on the calculation of the additional housing allowance. As already established in our representation letter (submitted to the consultation on the Further Residential Site Assessments) dated 21 August 2017, we strongly oppose the Council's chosen approach where they seek to raise concerns about the figure of 2,500 and its relevance.</p>	

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		<p>Consequently, we do not agree with the limited additional site assessments the Council has undertaken to produce their proposed modifications to the SAP. Taylor Wimpey’s site at Yatton has been consistently presented to the Council throughout the progression of the SAP as a suitable, available and deliverable site that is capable of achieving much needed housing delivery within the five year period, and should therefore be included in the SAP as a residential allocation. However, despite voluntarily submitting deliverability information to the Council as part of the SAP further assessment process, Taylor Wimpey’s site at Yatton was not considered and not appropriately tested for inclusion within the SAP. The only reason given for this was that the site was at Appeal. We object to the Council’s approach of excluding sites from further consideration and testing. The Council has not considered omission sites which are in accordance with the Core Strategy; this is simply on the basis they are not currently ‘in the development management system’. This approach is contrary to paragraph 24 of the Inspector’s letter where she sets out suitable sources of additional sites:</p> <p>“The following sources are identified by the Council for the additional allocations which are to be tested:</p> <p><i>Sites which are broadly consistent with the Core Strategy spatial strategy (sites within or adjacent to Weston, the towns and service villages, but not infill villages, countryside or Green Belt).</i></p> <p><i>Sites which have been considered through the SAP examination process.</i></p> <p><i>Sites which are in the development pipeline – as these are more likely to be deliverable and could potentially contribute to 5 year supply.”</i></p> <p>Omission sites should not be dismissed at this stage simply on the basis they have not met the Council’s threshold for being in the development management system.</p>	

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		<p>The Council’s approach has resulted in a very limited number of additional sites (just 22, amounting to 821 dwellings) now being proposed for inclusion within the SAP as part of these main modifications.</p> <p>We do not consider that the Council has worked closely with the development industry, as instructed at paragraph 25 of the Inspector’s letter of June 2017 where she recommended close working with the development industry because:</p> <p>“The aim should be to increase the likelihood of delivery through a wider choice of sites, and through the identification of sites which developers would commit to bringing forward within the timescale of the CS, and in particular within the first five years of the residual period to meet the shortfall in five year supply”.</p> <p>The Council’s approach has not sufficiently increased the likelihood of the delivery of the Core Strategy housing requirement, not least because the Council has been unwilling to consider sites put forward that do not fall within their specific inclusion criteria.</p> <p>We support the Development Consortium approach that it is highly unlikely that all of these 22 additional sites will deliver the quantity of dwellings anticipated by the Council in the predicted timescale. Nevertheless, these sites are only claimed to be capable of delivering a maximum of 821 additional dwellings. Even if all of these additional 821 dwellings were delivered in the next five year period this is an insufficient volume of units to address the Council’s current deficiency in the five year period. Based on the Council’s own figures (set out in the most recent housing land supply position based on a April 2017 base date) they are unable to demonstrate a five year housing land supply when a 20% buffer is applied to the calculation.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>There is a shortfall in North Somerset of 934 dwellings and therefore to only test the inclusion of 28 sites, and then to exclude 6 of these sites which reduces the proposed delivery from additional SAP sites to 821 dwellings raises significant doubt over the soundness of the SAP. The Plan, as is currently proposed to be modified, cannot even address the current shortfalls in the housing supply.</p> <p>The additional sites that have now been identified fall significantly short of the additional 2,500 units the Inspector asked the Council to test. In reply to the Council's initial response at the Examination that finding sites for an additional 2,500 dwellings would be 'challenging', the Inspector reaffirmed that they should aim to provide them. The Council has failed to assess the potential for accommodating anything close to this level of additional sites. In conclusion we object to the approach taken by the Council in failing to test the allocation of sufficient additional sites. The proposed modifications cannot be considered appropriate to enable the SAP to be found sound as they fall significantly short of the additional 2,500 units the Inspector asked the Council to test and even fail to adequately address the Council's current deficiencies in five year supply.</p> <p>On behalf of my client we invite the Inspector to consider holding further Hearing Sessions on the SAP to allow the inclusion of additional sites to ensure that the SAP is capable of delivering sufficient flexibility in the supply of housing required to ensure that the adopted Core Strategy housing requirement can be delivered by 2026. The Council has underestimated the potential supply of suitable and sustainable sites. Our client's site at Yatton should be considered as an allocation and sufficient sites to accommodate the full 2,500 dwellings suggested by the Inspector should be properly tested.</p>	

Respondent Name	Comment ID	Comment	Attached documents
Gleeson Strategic Land	4602593//1	<p data-bbox="539 328 943 360">Response to Main Modifications</p> <p data-bbox="539 392 1536 496">The Council have failed to address the matters raised in the Inspectors letter dated 26 June 2017. The failure to positively plan for housing in North Somerset has been a recurring theme throughout the Core Strategy and Site Allocation Plan process.</p> <p data-bbox="539 536 1559 600">These matters should be considered further at further Hearing sessions as there are still significant issues with the SAP.</p> <p data-bbox="539 639 1547 839">Gleeson are a party to, and fully endorse, the industry reps that were prepared and submitted to the Council prior to the consideration of the main modifications at the Cabinet. These representations, updated and submitted to the current round of consultation, highlight that the Council have failed to embrace the opportunity to plan for adequate housing provision in the district as advocated at all levels of Government and the NPPF.</p> <p data-bbox="539 879 1559 983">A particular area of the plan that illustrates the Council's negative approach to planning relates to the continued consideration of matters relating to Strategic Gaps in the area and particularly to the proposed gap between Nailsea and Backwell.</p> <p data-bbox="539 1023 1559 1334">Strategic Gaps are not supported by the NPPF, they are not an 'environmental' designation and certainly are not they type of designation protected by NPPF 14 footnote 9. They do not preclude land from benefitting from the presumption in favour of sustainable development. Their role in North Somerset, in terms of shaping a sustainable pattern of development, has not been properly tested or justified. At the previous hearing sessions held in May 2017 the matter of Strategic Gaps was not fully explored as it had become quite apparent that the Council had failed to develop a plan that positively planned for housing in the area. Whilst the Inspector, in requiring the allocation of additional housing sites, notes the environmental constraints in the district</p>	<p data-bbox="1592 288 2007 320"> Extract from JSP.pdf (740 KB)</p> <p data-bbox="1592 328 2110 392"> GLEE20970 GapAppraisalFinal.pdf (4.8 MB)</p> <p data-bbox="1592 400 2110 432"> 161213_227616_JSP_Rep.pdf (3.0 MB)</p> <p data-bbox="1592 440 1984 504"> GLEE20970 Floyd Matcham Appraisal.pdf (8.3 MB)</p> <p data-bbox="1592 512 2051 568"> 2016_12-16 WSPPB Letter - WOE JSP_JTS Rep.pdf (82 KB)</p>

Respondent Name	Comment ID	Comment	Attached documents
		<p>and a number of environmental/technical factors that will slow down the delivery of allocated sites, she does not, in any way, suggest that land within strategic gap should be ruled out. Conversely, she requires additional sites to conform broadly with the Core Strategy spatial strategy and provide a wide choice of sites, the outcome of which would inevitably be a requirement to seek positive opportunities for growth on the edge of the larger settlements, including within strategic gap. The Council with their proposed main modifications have still failed to achieve this goal: positive planning. Significantly, the NPPF calls for:</p> <ul style="list-style-type: none"> • Local planning authorities to seek opportunities for sustainable development avoiding adverse impact on the three dimensions of sustainability and where possible pursue alternative options which reduce or eliminate negative impacts (NPPF 152) • The plan to be justified with reference to reasonable alternatives (NPPF 182) <p>The opportunity existed for the Council to consider the merits for the proposed Strategic Gaps and realise the opportunities that existed for sustainable development in those areas so they achieve their housing goals. The negative approach, ruling out the positive consideration of land within gap (the principle of which was justified many years ago, against now out-dated planning policy and housing requirements) is an approach that is unjustified and ineffective. It is not sound, it is stifling the district and preventing the Council from achieving their modest goals for sustainable development outlined the Site Allocations Plan.</p> <p>Unfortunately, this negative approach is setting an unjustified policy baseline in considering further opportunities for growth to meet the revised OAN; it is being perpetuated in the emerging Joint Spatial Plan. The opportunities that exist for sustainable development are being ignored because of the unjustified and</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>unsubstantiated designation of Strategic Gap that the Council are trying to progress in this Plan.</p> <p>This can be evidenced by the emerging approach to the JSP for the area south of Nailsea where the area of land closest to the railway station with excellent access to the town centre is being overlooked for development on the basis that the land is a ‘Strategic Gap.’ This is despite the need for significant infrastructure in this part of Nailsea and the essential need for a new road across the gap in association with the development proposed. This approach is undeliverable, ineffective and unjustified. It is preventing the proper long term, comprehensive planning for the area and will continue to stifle housing delivery in sustainable locations. (representations on this have been made to the JSP – attached to this representation). Whilst the JSP is not principally a matter for this Inspector, it is important to highlight the matter and for our objections to the gap policy, and assessment of reasonable alternatives, to be fully addressed in the final examination report so that the negative approach is discontinued.</p> <p>At a meeting with the Council on 18th September, when the fledgling ‘masterplan’ for the Nailsea and Backwell expansion was revealed, the land to the south of Nailsea within the strategic gap was shown as delivering significant infrastructure but no housing. This infrastructure related to the location of the station and it’s role in ensuring that development in Nailsea was sustainable. However the Council, being wedded to the unsubstantiated Strategic Gap where housing development is concerned is resulting in a proposed development that does not relate to this important node in the transport infrastructure for the town. There is no justification to pursue infrastructure within a gap but not housing. There is no justification, with reference to the definition of sustainable development, to rule out opportunities to create sustainable extensions to Nailsea which approach housing and infrastructure in a comprehensive development. This would be an effective and deliverable approach.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>This void area to the south of Nailsea is based on the proposed Strategic Gap, which is yet to be confirmed. When this matter was raised with the Council it was suggested that, 'Councillors wanted the proposed Strategic Gap to be bigger'. Comments like this give the true reason for the designation of the gap. It is a political tool being used to resist seeking positive opportunities for sustainable development, not a land designation.</p> <p>The emerging JSP has outlined a policy for strategic growth in Nailsea (extract attached) including the need for an 'appropriate strategic gap.' However it also outlines a strategy that is dependent upon the station for transport infrastructure, sustainable employment opportunities and links to the residential areas of Nailsea. The inclusion of a strategic gap in the SAP will stifle and hinder the proper master planning for the future of Nailsea.</p> <p>The opportunity for main modifications offered the potential to review their position in relation to this designation to consider sustainable development and the Council have done nothing.</p> <p>SA9 Strategic Gap</p> <p>Just prior to the Hearing sessions the Council produced a retrospective Sustainability Appraisal for the Strategic Gap designations. This document was tailored to fit with the Council's published draft policies and clearly failed to consider reasonable alternatives. The alternatives considered on this topic are 'SAP allocation' or 'No Plan' this is not acceptable and fails to adequately justify the imposition of such a policy. As a consequence the plan as proposed to be modified remains unsound.</p> <p>This policy has been formulated on the basis that policy CS19 has been re-examined and confirmed by the Inspector. This presumption typifies the negative approach of the Council to this issue, preventing it from considering reasonable alternatives. The</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Council has retro fitted a poorly presented background paper on the matter of a strategic gap which fails to explain or justify the need for such a designation in this location.</p> <p>Our comments are focused in particular on the strategic gap to the south of Nailsea. Is there a need for a gap between the modest settlement of Backwell and Nailsea necessary and is it of strategic importance? The answer is clear, first this area does not need the protection afforded by such a designation as the land does not form a strategic function second, visually the settlements would remain separate without this designation, third the importance of the separation is, in any event, not justified in the context of national or local policy.</p> <p>As the policy is restrictive in nature and runs counter to the general national policy approach, enabling development, it must be clearly and robustly justified. However, the Council's own Sustainability Appraisal and evidence base fails to demonstrate that the proposal to include a strategic gap policy in the SAP is justified. It fails to set out the benefits of gap policy and how it is essential to help shape the future settlement pattern so as to allow for the projected growth whilst avoiding loss of settlement identity. It fails to test the effect on the three dimensions of sustainable development with and without strategic gap policy.</p> <p>The lack of evidence presented on this matter underlines the fact that the Council's proposal is inconsistent with national policy which does not provide support for local designations which prevent sustainable development, it is unnecessary and undermines the effectiveness of the plan to deliver sustainable development. It is a policy led by the political desire to prevent development in this area and not, as Strategic Gaps should be, to prevent coalescence of settlements. The area of land designated for this proposed gap, even if developed, would not cause the coalescence of Nailsea and Backwell.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>The background paper presented by the Council fails to demonstrate a robust approach to the issue of a Strategic Gap. The analysis is poor, the commentary of the considered Nailsea/ Backwell Plan is fundamentally flawed, it contains disingenuous photographs to illustrate factors that clearly do not exist.</p> <p>Gleeson advocates that proposals that incorporate development within the Strategic Gap are considered on a site by site basis, as development associated within a Strategic Gap location may be the most sustainable location for such development. In the case of Nailsea the restriction imposed by the strategic gap is preventing development on the most sustainable site in the Town. With great access opportunities to public transport including the station without use of the car it is the first location that the Council should be looking at for development opportunities. Yet, the Council have dismissed the opportunities out of hand, specifically on the basis of a 'gap' that has not been confirmed in the re-examined policies of the Core Strategy and without the evidence to justify the approach.</p> <p>Unlike the District or Town Council Gleeson have carried out an extensive study of this area which has been submitted to the Council before. The Strategic Gap between Nailsea and Backwell is without justification.</p> <p>In response to the emerging Sites and Policy Plan we have undertaken more significant examination of the Strategic Gap issue. This is particularly needed given the lack of any detail provided by the Council who have failed to follow any recommended methodology in developing the principles of a Strategic Gap and have failed to identify any criteria against which an assessment could be made to ensure an equitable approach across the district.</p> <p>We submit a detailed analysis of the need for such a gap which clearly concludes that there is no need for this designation.</p>	


Respondent Name	Comment ID	Comment	Attached documents
		<p>Definition of the Nailsea-Blackwell Strategic Gap</p> <p>The proposed strategic gap between Nailsea and Blackwell is described in Section 11.0 of the evidence paper. As noted previously, the proposed extent and boundaries of the strategic gap are substantially unchanged from those proposed in the 2013 Site Allocations Plan Consultation Draft. Consequently, if adopted, the strategic gap would take in a large area of land in the valley of the River Kenn where there is no risk of visual or physical coalescence between neighbouring settlement boundaries.</p> <p>Paragraph 11.8 of the evidence paper seeks to justify inclusion of land south of Nailsea by arguing that the strategic gap will help to prevent Nailsea from ‘spilling’ southwards over the well-defined ridgeline on the north side of the Kenn valley which marks the current limit of development at Nailsea. This part of the text confirms that prevention of encroachment into the countryside is seen by North Somerset Council to be a key objective of strategic gap policy. This approach could be applied to any greenfield site on the edge of a settlement and is entirely contrary to the primary purpose of designating a strategic gap, namely to prevent coalescence, (or the perceived risk of coalescence) between settlements.</p> <p>Plainly, if it were to be permitted, a development on the southern edge of Nailsea would not pose a significant risk of coalescence with Blackwell because the majority of Nailsea’s existing urban edge does not face towards the settlement boundary of Blackwell. Indeed, as noted in the conclusions to our 2013 appraisal, there is only a comparatively narrow corridor of land adjoining Station Road where, according to the criteria we have used, designation of a strategic gap might perhaps be justified.</p> <p>The SA itself doesn’t consider an alternative boundary scenario. It is suggested that even without a Strategic Gap policy the SA objectives would be realised in the SAP.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Summary</p> <p>North Somerset Council's evidence paper in support of Core Strategy Policy CS19 and policy SA9 in the February 2016 Site Allocations Plan Consultation Draft seeks to justify the designation of strategic gaps within the District and sets out specific reasons to justify the designation of a substantial strategic gap between Nailsea and Blackwell.</p> <p>Our analysis of the evidence paper demonstrates that there are fundamental concerns about the basis of the Council's justification for designating strategic gaps (particularly in the policy area of encroachment into the countryside) and continuing concerns about the criteria used for defining boundaries. In respect of the proposed Nailsea-Blackwell Strategic Gap, there is no logical justification for designating a very extensive strategic gap where there is no actual or perceived risk of coalescence between the settlement boundaries at Nailsea and Blackwell.</p> <p>Land for Development</p> <p>We would advocate allocating land to the south of Nailsea off Youngwood Lane for development.</p> <p>We have a long term interest in promoting the land and would be happy to liaise fully with local representatives of District Council, Nailsea Town Council and Backwell Village along with other stakeholders to ensure that any development on the site accords with national and local planning policies and other aspirations.</p> <p>The site is in a highly sustainable location. In terms of impact on the character of the area both Nailsea and Backwell have been developed over a number of years and this is reflected in the variety of architectural styles and forms. Given the position of our land on the edge of Nailsea we do not envisage any detrimental impact on the form and</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>character of the Town. Given the lack of development capacity within the settlement boundary it is envisaged that development will need to take place outside the existing settlement boundary. This is already acknowledged by the Council and this site offers the opportunity of providing for the much needed housing in the area.</p> <p>The development of the land of interest to Gleeson is completely outside the Green Belt.</p> <p>The land has a variety of uses historically and the agricultural use at present is mixed with the land being mainly pasture.</p> <p>Gleeson Developments Ltd are experts in promoting and realising development opportunities through the ever increasing complexities of the planning system. Our expertise means that we have an excellent track record solving planning and other technical land based problems. This has resulted in us being able to forge good working relationships with a wide range of local authorities and public bodies involved in the development industry.</p> <p>Technical work undertaken to date confirms that there are no ‘show stopping’ issues to preclude development of the site. The extent of work to date is proportionate in the context of an allocation. For a planning application, a number of detailed surveys would need to be undertaken which would take in the region of 1 to 5 years. We have already carried out an extensive landscape study (commentary on the proposed Strategic Gap attached) to ensure any future proposals are landscape led. During this time period it is anticipated that issues such as contamination and the influence of mining patterns will be identified and mitigation incorporated into any masterplan.</p> <p>The land itself is closely related to Nailsea. The form of development will need to be considered to ensure that both Nailsea and Backwell settlements retain their character and identity whilst being developed in a sustainable manner. We are aware that the</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Environment Agency identifies that part of the land is liable to fluvial flooding but the site is of a sufficient size that this area can be avoided and flood risk can be managed in any identified development opportunity.</p> <p>In the interest of sustainable development and proposal will need to have a drainage strategy which seeks to manage surface runoff and to ensure that there are no adverse drainage implications outside the site. It is anticipated that any investigations into this subject will result in solutions which may have beneficial water management effects on other areas in the vicinity of the site.</p> <p>Access to the land will need to be carefully considered, but there are obvious access points where safe and appropriate access could be achieved. This will all be considered in the longer term promotion of the land and considering the opportunities that exist. At the present time the exact form of development (masterplan) has not been decided upon. The development would include a mixture of housing types including affordable housing and could include an element of commercial uses to ensure that the form of development is as sustainable as possible. As an inevitable consequence of its location, there would be opportunities to improve links with the railway station, including the potential to improve access and car parking opportunities associated with the station.</p> <p>Gleeson's are committed to ensuring any development they propose accords with sustainable standards that are current at the time when any proposal is promoted. If through further consultation it is established that there is a desire to accommodate higher degrees of renewable energy sources or other 'green' technologies then this will be considered at that time.</p> <p>The town of Nailsea needs additional development to attract and retain young families in the area to ensure that facilities such as the school and other local services are maintained.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Any employment opportunities on the site could be beneficial to the local population and go some way to reduce the degree of outward migration from the settlement. This would not only reduce congestion but also have the beneficial effects on the local economy. However we have not encountered a situation where any planned employment opportunities have been limited geographically as to where employees could be obtained. This we feel goes beyond the role of the planning system.</p> <p>We are not promoting any other land within NSDC administrative boundary and are committed to this site in the long term for delivery of sustainable well considered, inclusive development. The need for affordable housing in the area and housing in general is identified not only in the Backwell Community Plan 2010 but also the Nailsea Town Council Baseline review identifies the need for affordable housing, sheltered housing and housing for those who wish to downsize.</p> <p>The delivery of these units along with conventional market housing should ensure the continued viability and sustainability for Nailsea and Backwell. The delivery of housing should enable the younger and older members of the population to continue to live in the area. This coupled with employment opportunities can only be beneficial to the development of the community.</p> <p>Being an experienced developer Gleeson are also very aware of the need to survey, identify and mitigate/ improve habitats and environs to enhance existing ecological interest. It is envisaged that with the land already available there is the opportunity for significant enhancements to be made to habitats in the locality.</p> <p>The development would therefore deliver net gains across all three strands of sustainable development and provides a fully justified reasonable alternative.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>In terms of delivery it is envisaged that the site would offer an opportunity to deliver a discrete development in accordance with both national and local planning policies. The proximity to the train station, bus links and the town of Nailsea will reduce dependence on the car to a minimal.</p> <p>In summary Gleeson believe that the site off Youngwood Lane offers a deliverable opportunity for a mixed use development. Any development proposal would have to be a sustainable high quality development which would enhance the area whilst providing for much needed housing and employment space.</p> <p>As experienced developers we are aware of the time needed to ensure that all technical matters are correctly addressed in terms of development opportunities. We will work closely with the community to formulate a proposal which sees the local area flourish without adversely affecting the attractive nature of its surroundings.</p> <p>I attach a plan for information we are not advocating development on the entirety of the land but suggesting that elements of this land can be developed in a way that would enhance Nailsea and make it a more sustainable location to live and work.</p>	
Anchor	5211809//1	<p>Examination into the soundness of the North Somerset Site Allocations Plan: Proposed Modifications</p> <p>Land at Wyndham Way / Serbert Way, Gordano Gate, Portishead</p> <p>I write on behalf of Anchor in respect the ongoing examination of the North Somerset Site Allocations Plan and the publication of proposed modifications to that Plan.</p>	<p> App1 CBRE Marketing Update Report 30.10.17.pdf (1.7 MB)</p>

Respondent Name	Comment ID	Comment	Attached documents
		<p>Anchor raises soundness concerns on the proposed modifications in respect of the following issues:</p> <ol style="list-style-type: none"> 1. Insufficient housing sites have been identified to achieve the requisite 5-year supply requirement, nor do the proposed modifications achieve the flexibility and certainty that the overall CS requirement to 2026 will be delivered. 2. Land at Serbert Way, Gordano Gate is retained as an Employment Land Allocation under Policy SA4 [Retention of Employment Uses] (as proposed to be modified) despite an extremely lengthy marketing campaign which confirms there is no interest to develop the site for these purposes. 3. The wording of Policy SA4 [Retention of Employment Uses] (as proposed to be modified) in respect of development management is unsound. <p>Issue 1</p> <p>The Council submitted Part 2 of its Site Allocations Plan (SAP) for examination on 24th February 2017. Following the examination hearings in May 2017 the Inspector wrote to the Council on 26th June 2017 setting out further guidance in relation to the delivery of housing.</p> <p>To secure the delivery of Core Strategy (CS) Policy CS13, the Inspector considered it necessary for the Council to test the provision of additional sites for up to 2,500 homes within the SAP. Specifically, the following key points were noted:</p> <ul style="list-style-type: none"> • <i>"The additional sites for up to 2,500 dwellings are not a proposal to increase the overall housing target identified in Policy CS13.</i> 	

Respondent Name	Comment ID	Comment	Attached documents
		<ul style="list-style-type: none"> • <i>The identification of additional sites would help to provide flexibility and certainty that the CS housing requirement can be met since:</i> <ul style="list-style-type: none"> o <i>Due to constraints on sites allocated in the SAP it is not certain that they will be developed by 2026;</i> o <i>Additional sites are required to make up for those which are unlikely to be delivered.</i> • <i>The increased choice and flexibility provided by additional allocations in the SAP would assist the Council in demonstrating that they have a five-year housing land supply."</i> <p>The Inspector made other conclusions regarding the application of the Sedgefield methodology and appropriateness of a 20% buffer for persistent under delivery. Within the letter, the Inspector also noted that the Council had proposed to test sites for allocation that accorded with all the following criteria:</p> <ul style="list-style-type: none"> • <i>"Sites which are broadly consistent with the Core Strategy spatial strategy (sites within or adjacent to Weston, the towns and service villages, but not infill villages, countryside or Green Belt).</i> • <i>Sites which have been considered through the SAP examination process.</i> • <i>Sites which are in the development pipeline – as these are more likely to be deliverable and could potentially contribute</i> <p>In respect of the first bullet it should be noted that the Inspector’s view (as expressed in paragraph 23) was that the ‘starting point’ must be to identify sites which are broadly consistent with the CS spatial strategy. This leaves the option open for sites beyond the</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="539 328 1563 427">spatial strategy to be allocated if needed to generate the requisite supply. Consequently, the starting point is by no means the ending point – albeit the Council have not even gone passed the starting point, by sourcing a lower level of supply of houses.</p> <p data-bbox="539 467 1570 775">The Council issued an interim response on 20th July (CD2 and CD2a). In paragraphs 7-15 it challenged the need to allocate as many as 2,500 homes. The Council chose to open with a ‘negotiation’ and justify the identification of a lower level of housing supply. In Anchor’s view this was not the correct approach and it is disappointing that the Council sought to claim that a significantly reduced ‘offer’ accorded with the ‘up to’ testing direction given by the Inspector. This strategic justification for a lower number has skewed the site search exercise that has followed, and, the Council has been driven by a self-determined target for the additional sites/dwellings that should be presented for allocation. This has narrowed its focus.</p> <p data-bbox="539 815 1563 1129">It is Anchor's view that the Inspector wanted to be presented with sites capable of achieving 2,500 homes, not only for delivery with the next 5 years but to 2026, in order to be able to identify environmental costs of this level of supply. Based on this information, it was then envisaged that a supplemental exercise would be necessary to determine whether 2,500 homes should ultimately be identified, or whether a lower figure was justified. By selecting sites that accorded only with all of the three criteria the Council appears to have only considered sites that are deliverable in the next 5-years. However, this was not the brief from Inspector as the instruction was not focused solely on immediately deliverable supply.</p> <p data-bbox="539 1169 1563 1268">Furthermore, if insufficient sites are identified in relation to the starting point criteria, it does not follow that the modifications exercise ends with the consequent offer. The Inspector needs to see what the implications are of allocating a full range of sites.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Anchor's view is that the Inspector does not have the information that would enable a final judgment to be made, and that a number of sites or sources have either been unsoundly discounted or simply not assessed.</p> <p>Fundamentally, a 5-year supply at adoption needs to be secured (although sites offering medium term flexibility also have value based on the Inspector's instructions, but seem to have been discounted by the Council). The evidence of the development industry at the hearings was that there was a significant gap between its assessed deliverable supply and what the Council were assuming (a gap of 3,859 dwellings). The Inspector's instruction in ID/4 to test up to 2,500 homes is reflective of a wide gap in 5-year supply, albeit not as high as 3,859.</p> <p>In response, the Council identified a short list of 28 sites yielding an estimated 1,763 units that accorded with its three selection criteria. This list excluded sites which had previously been refused or are awaiting an appeal or decision and is therefore flawed from the outset. Moreover, the lack level of identified supply suggests that that 'net' should be cast wider than the Council's methods allow for. The list then became a final 'short list' of 22 sites that are now proposed for allocation, following the September 5th Cabinet meeting, yielding just 821 units.</p> <p>The Council seems to have congratulated itself that this supply is sufficient to exceed the contested by year deliverable supply gap of 3,859 dwellings by 20%. However, the Council's position/analysis significantly misses the point. The 5-year supply gap needs to be fully addressed, not partly buffered as this would be inconsistent with NPPF:14.</p> <p>It is acknowledged that the Inspector has asked the Council to test up to 2,500 dwellings, rather than 3,859 dwellings, however a significant gap of 1,679 dwellings remains between 821 dwellings and 2,500 dwellings. In our analysis, there is still some way to go to achieve the requisite deliverable 5-year supply of 9,534 dwellings.</p>	

Respondent Name	Comment ID	Comment	Attached documents																								
		<p>Anchor’s position is that there remains scope within the context of NPPF:14 to move closer to the requisite supply figure, in a way that satisfies the tilted balance.</p> <p>Indeed, by reference to CD4a [Schedule 1 Information updated September 2017], even if the Council’s own site-specific assumptions are all accepted there is still a deficit of 385 dwellings.</p> <table border="1" data-bbox="539 564 1576 1241"> <thead> <tr> <th data-bbox="539 564 622 655">Year</th> <th data-bbox="622 564 1279 655">Council's Assumption</th> <th data-bbox="1279 564 1576 655">Council's Cumulative Assumption</th> </tr> </thead> <tbody> <tr> <td data-bbox="539 655 622 746">2017/18</td> <td data-bbox="622 655 1279 746">1,023</td> <td data-bbox="1279 655 1576 746">1,026</td> </tr> <tr> <td data-bbox="539 746 622 837">2018/19</td> <td data-bbox="622 746 1279 837">1,792</td> <td data-bbox="1279 746 1576 837">2,818</td> </tr> <tr> <td data-bbox="539 837 622 928">2019/20</td> <td data-bbox="622 837 1279 928">2,529</td> <td data-bbox="1279 837 1576 928">5,347</td> </tr> <tr> <td data-bbox="539 928 622 1019">2020/21</td> <td data-bbox="622 928 1279 1019">2,135</td> <td data-bbox="1279 928 1576 1019">7,482</td> </tr> <tr> <td data-bbox="539 1019 622 1110">2021/22</td> <td data-bbox="622 1019 1279 1110">1,167</td> <td data-bbox="1279 1019 1576 1110">9,149</td> </tr> <tr> <td data-bbox="539 1110 622 1153"></td> <td data-bbox="622 1110 1279 1153">5 year requirement</td> <td data-bbox="1279 1110 1576 1153">9534</td> </tr> <tr> <td data-bbox="539 1153 622 1241"></td> <td data-bbox="622 1153 1279 1241">5 year shortfall (on council's own figures, including proposed additional sites)</td> <td data-bbox="1279 1153 1576 1241">385</td> </tr> </tbody> </table>	Year	Council's Assumption	Council's Cumulative Assumption	2017/18	1,023	1,026	2018/19	1,792	2,818	2019/20	2,529	5,347	2020/21	2,135	7,482	2021/22	1,167	9,149		5 year requirement	9534		5 year shortfall (on council's own figures, including proposed additional sites)	385	
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2017/18	1,023	1,026																									
2018/19	1,792	2,818																									
2019/20	2,529	5,347																									
2020/21	2,135	7,482																									
2021/22	1,167	9,149																									
	5 year requirement	9534																									
	5 year shortfall (on council's own figures, including proposed additional sites)	385																									

Respondent Name	Comment ID	Comment	Attached documents
		<p>However, in reality there remains a very high degree of risk within these figures, not least in relation to the trajectories for Weston Villages and Parklands Village in particular. We suggest that a further set of modifications with a further tranche allocations is needed to achieve a 5 year supply and to meaningfully de-risk achieving the overall CS requirement.</p> <p>Furthermore, the Council can place little if any reliance on the West of England JSP process correcting any deficiencies as (1) it is only identifying strategic locations for longer development with complex infrastructure pre-requisites e.g. new motorway junctions and very significant new lengths of highway connecting Bristol Airport to the M5, and (2) it only proposes 1,000 units on non-strategic sites (hence the Council's identification of only 821 units in the current SAP modifications). The JSP, and by implication, the North Somerset Local Plan Review are not currently set up as vehicles to boost 5 year supply to 2026.</p> <p>Issue 2</p> <p>The land that is the subject of this letter presents a highly sustainable and deliverable site for addressing the issues highlighted by the Inspector in ID/4. Moreover, it addresses the need for a particular type of housing, the need for which is uncontested.</p> <p>The Council's Additional Site Assessments (1st August 2017)</p> <p>The Council's August assessment records that a pre-application process is underway for the land at Serbert Way, Portishead and that this is for an older persons housing development. This is correct. However, the assessment gives the impression that a care home is proposed. Anchor wishes to make clear that self-contained units of older person's accommodation are proposed. The proposal is for 90-100 Assisted Living Units to meet the needs of older people, aged 60+, all of which require a degree of care.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Each unit would count towards the CS housing requirement and, if allocated, the site can contribute to 5-year housing land supply¹. The proposal will provide 11-15 FTE jobs and will provide an annual GVA contribution of £550,000 - £714,000 per annum². The design response to the site has been positively received by the Council and thus there can be confidence in its assumed capacity. The main planning issue relates to the use of the land.</p> <p>The Council's August assessment correctly presents the planning history of Anchor's site at Serbert Way. It acknowledges that in March 2013, the Council granted planning permission for a retail store on the site, which has since lapsed (12/P/1255/O). This followed the granting planning permission for a similar scheme in 2010 (09/P/1774/O). However, the assessment does not present the case officers reasoning.</p> <p>The delegated officer report for the most recent application states that <i>"Although traditional B1 office development on the site might have led to more jobs, it would seem, on balance that this is unlikely, given the length of time the site has been vacant, together with existing economic analysis of Portishead"</i>. Given this planning judgement it is incumbent on the Council to demonstrate through evidence that it is now likely that a Class B development will come forward to justify the continued safeguarding of the land. Anchor observes no such evidence from the Council despite the Council's Economic Development Team actively putting the site forward to developers / occupiers looking for Class B accommodation in North Somerset. Conversely it is for Anchor to provide the evidence to demonstrate that the commercial development market for Portishead is the same or more challenging than in 2012. This has been achieved and we refer you to previously submitted reports by Hartnell Taylor Cook and CBRE (dated February 2017)³. A further marketing update report by CBRE for the period from June 2017 to the present is attached at Appendix 1 to these representations. The marketing has been undertaken in consultation with the Council's economic development service.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Site History</p> <p>The site was allocated in 2007 (and has been marketed as a ‘B’ use opportunity site since that time) but is no further forward in being developed for such use. Under the current ownership, the site has been marketed continuously since April 2013 but with no interest. Since June 2017 a further 6-month phase of marketing being undertaken. To the end of October 2017, no interest has been received from B class developers / occupiers. Most interest is usually received in the first month of a new campaign.</p> <p>Elsewhere at Gordano Gate, land at Harbour Road is proposed in the Allocations Plan as a residential-led housing allocation of 93 dwellings to include 420 sqm of B1a office space (proposed modification reference MM19). At the standard HCA jobs density of 1 office job per 12 sqm this scheme could support around 35 jobs. The site is also subject of a planning application with an officer recommendation for approval reported to Committee in August 2017. As previously stated Anchor’s proposal will provide 11-15 FTE jobs.</p> <p>The Committee Report for the Harbour Road scheme states, under Issue 1: ‘Principle of Development’, that:</p> <p>"This site is previously developed land within the Portishead settlement boundary and the adopted Core strategy sets out the Council’s approach to this proposal. The strategic guidance in policy CS14 states that outside Weston-super-Mare, most development will take place at Portishead, Clevedon and Nailsea on sites within or abutting the settlement boundary. Priority will be given to the re-use of previously developed land. Core strategy policy CS31 states that new housing development inside the Portishead settlement boundary will be acceptable in principle provided it is an appropriate scale, of high quality design which respects the character of the town, delivers necessary infrastructure and enhances sustainability. It also states that alternative uses for existing</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>employment sites will only be considered where they address other identified community benefits and do not have an adverse impact on the quality and range of sites and premises available for business use.</p> <p>The site is safeguarded for employment development under the saved North Somerset Replacement Local Plan policy E/5, however this policy allows for other uses provided that the proposal does not harm the range or quality of land and premises available for business use development or if the alternative use contributes to a more sustainable pattern of development that would outweigh the loss of employment capacity in the locality.</p> <p>In accordance with these policies, the applicant has submitted evidence of marketing and an assessment for the demand for employment land at Portishead has been undertaken. This has been assessed by the Council's Economic Development team and it has been concluded that there is little demand for such land (which has been undeveloped since consent for office development was granted 14 years ago in 2003), but that there is a need for new flexible class B1 units ready to be occupied. The application has been amended to respond to this and now delivers two units which on average (when applying the HCA Employment Densities Guidance) could provide up to 40 jobs. Funding for other employment generating projects at Portishead is also under consideration for provision via the S106 agreement.</p> <p>The application will therefore improve the range of employment opportunities at Portishead and will also help deliver a more sustainable pattern of development by the provision of local jobs that will help reduce out-commuting. It is therefore concluded that the proposals comply with adopted NSRLP policy E/5. A condition is recommended to prevent the future conversion of the B1 units to residential use.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>The emerging Sites Allocations Plan which is under preparation by the Council is a material consideration to this proposal. The current land allocation at Portishead is currently being reassessed in order to help meet the Council's housing requirements in accordance with the Inspector's comments and the re-adopted policy CS13.</p> <p>The Council currently has a shortfall in its housing supply and this carries significant weight in the consideration of proposals for new housing development. The site is in a sustainable location and it is considered that the benefits of the scheme outweigh any other impacts".</p> <p>Having regard to the committee report, it is evident that the Council's Economic Development Service assesses that there is little demand from within the commercial development sector to construct a standalone 'B' class building within Gordano Gate. However, they do assert that there is demand from occupiers and have arrived at a negotiated solution with the developer4.</p> <p>Based on the Committee report, one can conclude that the Council accept that the only way to achieve the delivery of 'B' class space is through mixed use development at Gordano Gate that provides both residential and employment uses.</p> <p>Consequently, the allocation of Anchor's Site at Serbert Way, under the terms of SA4 (for employment uses only) (as proposed to be modified) is not justified as the Council accepts that the policy aspiration is not deliverable. Unfortunately, the verbatim comments of the Economic Development service has not been posted on-line and therefore we must rely on the context of the Committee report.</p> <p>Due the logic within the Committee report for Harbour Crescent, the Council's case is effectively that the remaining undeveloped land at Serbert Way should be more valued</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>in employment terms (due to scarcity), as the Council accept that it is not deliverable as a single use 'B' class project by 2026 plan period.</p> <p>Given this evidence, residual land at Gordano Gate (Serbert Way) should not be allocated under Policy SA4 (as proposed to be modified) as the Council's reasoned logic dictates that the major use of the site will not be delivered as 'B' class. Moreover, the small level of 'B' class that has been accepted by the Council in respect of Harbour Crescent is evidence that there is, at best, only limited/tentative occupier demand. Notwithstanding this, the marketing carried out specifically for the Serbert Way site by CBRE, puts this in to question.</p> <p>These factors need to be weighed in the balance given the current focus of the Site Allocation Examination, where the Council finds itself in NPPF:14 tilted balance situation. Whilst it might be possible to incorporate office space in a conventional residential-led scheme at Serbert Way, this is not what is proposed. An Older persons housing scheme is proposed that will require all of the site. It is considered that this should be judged on its merits, taking into account the employment generated as well as the benefits of the scheme in terms of meeting the needs of an identified group of people as well as contributing towards five year land supply. An older persons housing scheme will also not add to out-commuting, nor add pressure on school places, yet will positively free up under occupied homes for family housing. The SA4 designation should therefore be deleted and the site allocated for residential development.</p> <p>In the section on planning policy, the Council's August assessment records that although the site is within the extended town centre, it is allocated exclusively for Class 'B' uses. The assessment fails to acknowledge that this is the only part of Gordano Gate that is within the town centre, which must be material to how this site is assessed in relation to other land at Gordano Gate. This is especially true in the current plan-making context, where the Inspector is looking for measures to 'fix' the 5-year land supply</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>position and to increase the flexibility in the Plan in respect of housing supply, not reduce it.</p> <p>Importantly, the reasoned justification for DM60 (Town Centres) (in which the site falls within) encourages residential development as part of mixed use schemes using upper floors, however, the SAP seeks to take away that flexibility. Moreover, Policy DM60 does not rule out purely residential development proposals in a town centre. Further, the NPPF itself (para 23: bullet 9) does not impose any ‘upper floor’ constraint and simply requires LPA’s to encourage residential development on appropriate sites in town centre locations to create vibrant communities. There is therefore existing, recently adopted policy supporting a wider range of uses on the land at Serbert Way. The SAP’s proposed allocation reduces that flexibility at a time when it is needed.</p> <p>Whilst the Council’s August assessment states that the land uses surrounding the site are retail (Homebase, Argos, Sainsbury’s), and business (the Chorus office), it should also be recorded that the neighbouring uses include leisure (Premier Inn). In the section on ‘compatibility with surrounding uses’ the assessment states <i>"Potential for compatibility issues with surrounding business/retail uses"</i>. In our assessment, there are no potential compatibility issues and this should be amended. The site is extremely well located in relation to other services and within the town centre and therefore makes it an ideal location for a development for older persons. In the section on ‘features on or near to site that would influence potential’ the assessment states <i>"Neighbouring business uses may influence development of this site"</i>. We also dispute the justification for this. The Council can be confident that housing would be compatible with its surroundings. There are no ‘bad’ neighbour issues as demonstrated by the officer’s recommendation at Harbour Crescent which confirms this.</p> <p>The Council’s August 2017 Sustainability Appraisal</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>As the proposed use is for older persons housing, the amber grading in respect of primary educational facilities at Portishead (Sub-objective 2.2) is not relevant.</p> <p>The site is partially within Flood Zone 3a (defended). The assessment method states that <i>Sites that are within Flood Zone 3a and may require some flood mitigation works are highlighted as "amber." Sites totally outside Flood Zone 3 are given a "green" rating.</i> The site is partially within Zones 1, 2 and Zone 3a. The site is graded as red. However, given that it is defended and is capable of being developed with further flood mitigation works, it is not clear why it is not graded as amber. Given the officer recommendation at Harbour Crescent, and the proposed allocation at Old Mill Road, it is not considered that flood risk is a barrier to residential allocation. Furthermore, advice on flooding provided to Anchor by a specialist flooding /drainage consultant is that flooding / drainage will not preclude development at this site</p> <p>Sub-objective 5.4 covers retail accessibility and the achievement of a reasonable access to sustainable transportation via proximity to a railway station. The site is recorded as amber for being within the 2km -5km band. In response, the site is located within the town centre. With regard to the railway station, as the Council will know, the credentials of Portishead are set to improve and this should have been recorded as part of any site assessments in the town. The site description in the committee report for the Harbour Way site notes the proposed MetroWest station in the immediate vicinity of Gordano GateThis will also be in walking distance of the site at Serbert Way.</p> <p>The September 5th Cabinet Report</p> <p>On page 5 of the Cabinet report, Anchor’s site is referred to as Harbour Road/Serbert Way under category (f) ‘sites with employment implications’. The report states that:</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>"This is both an employment allocation and in an area where town centre uses are acceptable. It would be inappropriate to allocate the site for residential given the need to retain some alternative employment provision in Portishead town centre. The site is not allocated for inclusion".</p> <p>The argument from the Council is one of scarcity of employment land as a result of the proposed allocation of other formerly allocated employment land in Portishead for housing. However, as has been presented, the Council's determination of the application at Harbour Crescent demonstrates an acceptance that the commercial property sector (the supply side) is not going to invest in the development of such space, as potential occupier (the demand) side is lacking. This is further confirmed by the marketing campaign undertaken by CBRE (including the October 2017 update report) and the Employment Availability Space review by HTC. In short, the risk profile is stacked against commercial development. What little demand there is for space (from those not already adequately accommodated) can be met through churn in the market, thus negating the need for new space to the extent that large no not need to be protected (such as at Gordano Gate). This position renders the allocation 'hollow', unlikely to be delivered and therefore not justified. The simple fact is that there is a definitive immediate need for housing land, including specialist housing land, and a tentative /aspirational need for a large commercial development site, where the Council have previously stated (in 2013 and 2010) that 'B' class development is unlikely.</p> <p>A little further explanation for the Council's position is set out in Appendix A of the cabinet report, which states in relation to Anchor's site, on page 18, that:</p> <p>"It is still considered that the site has potential to support a range of local employment uses, and that, there are concerns that sufficient marketing for business employment uses has not been undertaken in the context of the current allocation".</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>To the extent that the land is undeveloped and within the town centre it should, in theory, be the sort of location that commercial investors would want to build. To that extent it has potential. However, the fact the site has not previously been developed for class B uses illustrates that the market is not strong enough and the risk profile is too high for a speculative developer to take that risk. This is especially the case where vacant serviced accommodation at Kestrel Court, and elsewhere, is on the market. The Council is not taking into account market signals (as it is required to do) and given the locational attributes of the site, its non-development speaks volumes in respect of the market across the economic cycle (since 2007).</p> <p>The Council also seems to think that a refreshed development allocation somehow resets the clock in terms of the evidence base required to justify an alternative use. Clearly a refreshed allocation does not affect basic market conditions, and we have presented elsewhere (under Issue 2) that in 2010 and 2013 the Council accepted that a 'B' use was unlikely and that marketing since then suggests that the circumstances that shaped the Council's previous assessment have not improved. However, the Council still persists with aspirational 'B' use allocations. This contrasts with the mixed-use approach that has been permitted at Harbour Road – confirming that a single use 'B' Class allocation could not be justified in the current circumstances.</p> <p>Issue 3</p> <p>Anchor supports the aim of the proposed modifications to streamline policies SA4, SA5 and SA6 into a revised Policy SA4 that governs a range of circumstances where applications would result in the loss of land allocated for business use, or existing premises protected for business use.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>In the SAP as submitted, allocated undeveloped employment land was captured by Policy SA4. Anchor’s proposal would have been subject to bullets 4 and 5 which required the applicant to demonstrate that:</p> <ul style="list-style-type: none"> • The planned B Class use <i>[of the site]</i> is not suitable and that there is no realistic prospect of the site coming forward for its planned use. • The range and quality of land available to meet future business needs is not adversely impacted. <p>No ‘and’ or ‘or’ was positioned between bullets four and five to set out if they were to work together or not. Anchor suggest that ‘or’ would have been the appropriate word to use as if there was to be no realistic prospect of a site coming forward (e.g. due to commercial risk /viability or a lack of developer interest), then even if its non-delivery would affect the potential future supply of occupier space, it irrelevant, because the planned B use will not be delivered. Conversely, if the land is suitable for the planned B class use, and could come forward, yet there is sufficient churn activity and land available elsewhere then the loss could be accommodated without adversely impacting future business need. On this basis, the wording should have been revised to:</p> <ul style="list-style-type: none"> • The planned B Class use <i>[of the site]</i> is not suitable and that there is no realistic prospect of the site coming forward for its planned use, or • The planned B Class use is suitable, and achievable, yet the range and quality of land available to meet future business needs would not adversely impacted. <p>Broadly speaking Anchor would have been satisfied with such an approach as it would have led to decision making based on a sensible framework, requiring evidence of marketing and availability elsewhere in the locality.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>However the proposed revised bullets to Policy SA4 are poorly constructed. It is considered that, based on amendments to the text, the introduction of the words ‘and’ and ‘or’, and a resequencing of the bullets, Policy SA4 should instead be read as follows:</p> <p>The introductory sentence can remain in its current form, but hereafter the policy should read:</p> <ul style="list-style-type: none"> i. Through demonstration by marketing material or other means, that the site is no longer capable of offering suitable accommodation for business use, or there is no realistic prospect of the allocated site coming forward for its planned use, or ii. The site remains suitable for B Class use, yet the range and quality of land available to meet future business needs would not be adversely impacted, or iii. The proposal would lead to the removal of development incompatible with surrounding uses, resulting in greater potential community benefits including environmental benefits; the significant improvement in the amenity of existing neighbouring residents; or would contribute to a more sustainable pattern of development that would outweigh the loss of employment capacity on the locality, or iv. There is a specific requirement associated with an existing business use, and the requirement can be met without negatively affecting other existing neighbouring business uses, or allocated land. <p>The above suggested bullets enable a grounded and transparent assessment of non-B use proposals, based on evidence, and is not more burdensome than the submitted Policy SA4 in respect of large non-B use proposals on allocated B use sites.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Essentially one could pass all the tests listed above yet the Council could still fall back on the newly introduced test (at least in relation to undeveloped allocated land5) that reads:</p> <p>- The loss of the site would not adversely impact the ability to achieve wider economics aspirations including regeneration, business growth and improved community patterns</p> <p>Anchor submits that it is not reasonable to require an applicant to be able to challenge an ‘aspiration’, especially for business growth beyond the tests of our proposed bullets (i -iv). Applications should be tested against grounded matters for which an evidence base can be prepared. Anchor’s proposed bullets (i) and (ii) enable the correct degree of testing in respect of the impact on major non-B proposals on economic development objectives. At present the proposed safeguarding of undeveloped land for B uses at Gordano and the proposed modifications to SA4 are in conflict with NPPF:22. Policies which led to the lead to long term protection of sites allocated of employment use where there is no reasonable prospect of such use are to be avoided.</p> <p>For all the reasons set out under Issue 2, Anchor argues that its proposal at Gordano Gate when assessed against a soundly modified SA4 is in conformity with it. The continued 5-year supply deficit addressed under Issue 1 further tilts the balance in favour of the identification of the land at Serbert Way in the SAP as a housing allocation. Whilst the Plan cannot control the precise type of housing that will come forward it is evident that specialist older persons housing is the intended outcome. Furthermore, this will also generate permanent employment opportunities beyond the construction phase.</p> <p>APPENDICES ATTACHED</p>	

Respondent Name	Comment ID	Comment	Attached documents
KRG22	8037089//1	<p>Site allocation plan October 2016 Schedule 1 Nailsea - consultation comments</p> <p>In relation to the 2 additional developments of 183 and 450 houses planned for Nailsea I note the Transport Assessment requirement detailed however given the absence of any infrastructure improvement for many many years, I am concerned the current status quo will simply be allowed to continue.</p> <p>I therefore object to development of the magnitude proposed as I consider the road transport infrastructure is inadequate to safely support existing traffic levels and most certainly not heavier use. Feedback needs to be obtained from people who have to use these roads regularly.</p> <p>There are 4 main access routes to Nailsea (detailed below) and they each have restrictions not commensurate with road safety for a town of this size.</p> <ol style="list-style-type: none"> 1. Station Road towards Backwell and the A370 - single lane, low railway bridge, and narrow road / pavement outside Backwell school. 2. B3130 towards Bristol via Long Ashton - pinch point by Battle Axes pub where two lorries or buses cannot pass on opposite sides. 3. Wraxall Hill to reach M5 at Portbury - very narrow and unsuitable for heavy vehicles, followed towards M5 by Portbury Lane, also narrow and single lane through Portbury Village. 4. B3130 towards Clevedon at junction with Tickenham Hill - accident black spot, dangerous junction and in the same vicinity a pinch point where two lorries or buses cannot pass each other. 	
Diane	8052353//2	<p>I am unclear as to why it is proposed to amend AM50, land off Trendlewood Way, to delete the requirement to make land available for a local shop. In my opinion, a shop on</p>	


Respondent Name	Comment ID	Comment	Attached documents
		<p>this site would be a useful local amenity and would also reduce the number of unnecessary car journeys to the town centre, as there is currently no shop within easy walking distance.</p>	
The Church Commissioners for England	8135297//1	<p>North Somerset Site Allocations Plan 2006-2026: Main Modifications Consultation Representations on Behalf of the Church Commissioners for England</p> <p>We write on behalf of our client, the Church Commissioners for England (the Commissioners), who are long-term landowners in the North Somerset area. The Commissioners manage a well-diversified investment portfolio to support the Church's work across the country. The Commissioners are seeking to make a further representation to the Site and Allocations Plan 2006-2026 in relation to its site at the Veale, Bleadon (the Site).</p> <p>Previous Representations</p> <p>We submitted representations in relation to the Site, on behalf of the Commissioners, to the draft Site Allocations Plan consultation in April 2016 and the Sites Allocations Plan Publication Version consultation in December 2016. Following a review of the Site Allocations Plan Main Modifications, we understand that the Veale has not been allocated as a site for residential development.</p> <p>The Commissioners are broadly supportive of the draft Site Allocations Plan, however they still consider that the Site should be allocated for residential development. The Site will make an important contribution to the supply of housing in the district, which is in</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>line with the Core Strategy in terms of delivering new sustainable housing developments across North Somerset.</p> <p>The site is suitable for a sensitive residential development. It is entirely within the ownership of the commissioners and is capable of being brought forward quickly to assist in the delivery of new housing for North Somerset once planning permission is obtained.</p> <p>The Veale, Bleadon</p> <p>The Site is located at the eastern edge of the village of Bleadon adjacent to the settlement boundary and is currently used as grazing land for horses. The Site is bounded on three sides by existing housing and by a strip of woodland to the south. It represents a natural infill to the village, with good access to local amenities.</p> <p>Bleadon is located 4.6 km to the south east of Weston-super-mare; the A370 connects the settlements and provides access to several bus routes. Access to the Site is via a gate from The Veale, accessed from Shiplate Road, the arterial road in the settlement.</p> <p>Principle of Development</p> <p>The Site abuts the settlement boundary of Bleadon which is identified as an infill village and is subject to Policy CS33 'Infill Villages, smaller settlements and countryside' of the Core Strategy. Policy CS33 seeks to control development to protect rural areas and prevent unsustainable development. The Commissioners consider the Site to be a sustainable development which will have a positive impact in terms of delivering houses for the district that respects the scale and the character of the settlement. Policy CS14 'Distribution of new housing' of the Core Strategy states that proposals for development located outside of settlement boundaries will only be acceptable where</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>proposals comprise sustainable development which accords with the criteria set out in the settlement policies. The Site will not result in any ecology, transport, or amenity issues, as discussed below, and should be considered sustainable. As such, the proposal is considered to meet the requirements of Core Strategy Policy CS14.</p> <p>The Site is appropriately located on the Bleadon and is surrounded on three sides by residential development. Heavy screening features on the southern boundary. The openness of the Site will be retained through the retention of ecological features as discussed below. The proposed allocation is therefore consistent with Policy DM37 'Residential dwellings in existing residential areas'. Policy DM37 of the Site and Policies Plan: Development Management Policies 2016 supports infill development in certain circumstances of which any future proposed development could meet.</p> <p>The Site is located in the South Hill Site of Nature Conservation Interest and is subject to Policy DM8 Wildlife Sites of the Sites and Policies Plan Part 1. The Commissioners commissioned the attached 2017 Phase 1 Habitat Survey to examine the vegetation and habitats of the Site, and the Sites potential to support a range of protected species. The survey identified that the grassland on the northern extent of Site was of low ecological significance. The southern extent was of higher ecological value containing Deciduous Woodland Priority Habitats on the Sites southern boundary in the form of narrow strip. This could be retained as part of any scheme and future development would be designed sensitively to complement the surroundings to the sensitive ecological area to the south of the Site in accordance with Policy DM8 and DM37.</p> <p>Access to the Site will be provided from the Veale. An access appraisal has been undertaken for the Site and confirms that suitable access can be provided to the Site by extending the existing access from the Veale.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>There are no technical constraints why the Site cannot be allocated. An allocation presents an opportunity to bring underutilised land back in to meaningful use, delivering valuable new homes for the district. The Site is also located wholly within Flood Zone 1 and is not within the Green Belt.</p> <p>Conclusion</p> <p>In summary, the Commissioners are pleased to have the opportunity to provide comments in relation to the North Somerset Site Allocations Plan Main Modifications. The Commissioners broadly support the document however consider that the Site should be allocated within the Plan for a residential development, as it would make a valuable contribution to the supply of housing in the district. The proposed land use would be designed to not give rise to any ecological and residential amenity issues and would be an appropriate use in the existing settlement.</p> <p>Should you have any queries on this correspondence, please contact myself or Jonathan Hoban on 020 7936 3000 or jhoban@deloitte.co.uk</p>	
Clevedon Town Council (I Johnson)	8141825//4	<p>To reiterate previous comments;</p> <p>NORTH OF CHURCHILL AVENUE (Schedule 1) Request that this remain as a public open space.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>MILLCROSS SITE (Schedule1) In the event of the site not being used for a hospital request the site is used for affordable or social housing.</p> <p>LAND WEST OF KENN ROAD (Schedule 2) If part of this site is developed for housing request that at least 30% of the housing is affordable or social housing.</p> <p>Please note these comments are subject to ratification at the next full Council meeting on 22nd November 2017.</p>	
National Grid (AMEC)	8173025//1	<p>SUBMISSION ON BEHALF OF NATIONAL GRID</p> <p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.</p> <p>We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.</p> <p>Further Advice National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.</p>	

Respondent Name	Comment ID	Comment	Attached documents
Richards Developments	9143521//1	<p>I am writing on behalf of my client, Richards Developments, in respect of the consultation on the Proposed Main Modifications to the Site Allocations Plan. This representation covers the following matters:</p> <ol style="list-style-type: none"> <li data-bbox="535 580 1473 644">1. The LPA's decision not to undertake the work requested in the note from the Inspector following the closure of hearings on 18th May 2017. <li data-bbox="535 683 1384 715">2. The LPA's approach to identifying potential new housing allocations. <p>1. The LPA's decision not to undertake the work requested in the note from the Inspector following the closure of hearings on 18th May 2017.</p> <p>At paragraph 22 of the note issued on 18th May 2017 (ID4) following the closure of hearings the Inspector states:</p> <p><i>"I consider that the Council should test the potential for the provision of up to 2,500 additional houses in order to identify the environmental costs of allocating a wider choice of housing sites. Furthermore, where new allocations are to be made, there is a need to identify and allocate sites which can be made available for development at an early date to help meet the five year supply as well as secure the overall delivery of the housing requirement by 2026."</i></p> <p>The instructions from the Inspector were clear and unambiguous. We were therefore extremely disappointed to note from the LPA's interim response (CD2) to the Inspector that they decided not to undertake the work that was requested.</p>	 Representation - Richards Developments 26.10.17.pdf (2.7 MB)


Respondent Name	Comment ID	Comment	Attached documents
		<p>Firstly, at paragraphs 7 to 16 of CD2 the LPA attempt to reopen discussion on the figure of 2,500 dwellings and make the case for a lower figure. This is inappropriate as it is not within the scope of work requested by the Inspector, and is clearly an attempt to row back on what was agreed during the hearing sessions.</p> <p>Secondly, the LPA has not tested the “<i>potential for the provision of up to 2,500 additional houses</i>”. Even if all of the 28 sites on which the LPA sought comments on in August had been deliverable by 2026, they would have only delivered a total of 1,812 dwellings. This falls significantly short of the figure of 2,500 dwellings that the LPA was asked to test.</p> <p>2. The LPA’s approach to identifying potential new housing allocations</p> <p>The key reason that the LPA was unable to identify sufficient sites to meet the 2,500 dwelling requirement is the methodology that they have used, specifically:</p> <ol style="list-style-type: none"> 1. The LPA has decided to exclude sites where an application or pre-application request was not submitted before 18th May 2017. 2. The LPA has decided to exclude any sites that do not fully comply with the Core Strategy. Despite the Inspector noting at paragraph 23 of ID4 that: <p><i>"A further potential constraint to the identification of additional allocations is the distribution of housing identified in Policy CS14. However, CS14 refers to the “broad distribution of new dwellings” which indicates that the net additional dwellings listed in the policy do not constitute a straight jacket to be achieved, and that there is some flexibility for the distribution of housing provision within the settlement hierarchy in the CS."</i></p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>This methodology has resulted in the LPA discarding a number of sites that could enable them to achieve the 2,500 dwelling requirement. One of these sites is the Land at Sousta Taverna, Congresbury. The Pre-Application Request submitted in respect of the site and the Pre-Application Report issued by the LPA are included at Appendices 1 and 2 respectively. While it is acknowledged that the site is not directly adjacent to the settlement boundary for Congresbury (a Service Village), the documents demonstrate that:</p> <ul style="list-style-type: none"> • The site is in a sustainable location, within walking distance of St Andrew’s Primary School (500 metres) and the local shops on Station Road (600 metres). It is also well served by public transport, with nearby eastbound and westbound bus stops (200 metres) that provide access to both Weston-super-Mare and Bristol. • A third of the site is previously developed land with existing compatible uses on either side. • There are no technical constraints that would preclude development. • A high quality development of around 20 dwellings could be delivered. • The site can be delivered within the next 5 years. <p>Furthermore, the proposals were discussed at a meeting of the Congresbury Parish Council Planning on 21st August 2017. The minutes are included at Appendix 3 and include the following statement:</p> <p><i>"Members and Cllr Leimdorfer considered the plans and stated that they were largely in favour although the proposed development is outside of CS32 and is not adjacent to the settlement boundary but would link with the development at Station Close".</i></p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Conclusions and Recommendations</p> <p>The Proposed Modifications are insufficient to make the Site Allocations Plan sound. Specifically, the Plan has not been 'positively prepared' and is not 'justified', two of the tests of soundness set out at paragraph 182 of the NPPF.</p> <p>In order to avoid address this issue I strongly urge the Inspector to pause examination and advise the LPA that they need to undertake a more thorough site assessment process that identifies sufficient sites to address the significant shortfall in the LPA's 5 year housing land supply, and ensure that they meet their overall housing requirement for the plan period.</p> <p>Finally, please note that I would like to appear at any future hearing sessions on the Site Allocations Plan.</p> <p>PLEASE SEE ATTACHMENT TO VIEW APPENDICES</p>	
Coal Authority	928833//1	<p>Thank you for your notification of 18 September 2017 in respect of the above consultation.</p> <p>I have reviewed the modifications proposed and can confirm that the Coal Authority has no specific comments to make.</p> <p>It is assumed however that the new allocations proposed have been considered against the relevant Development Risk and Surface Coal resource plans provided to the LPA by the Coal Authority.</p>	

Document Section		2. Additional modifications	
Respondent Name	Comment ID	Comment	Attached documents
Rob Turvey	14724001//4	In relation to AM55 and without prejudice to Policy DM35 of the Sites and Policies Part 1: Development Management Policies, any properties constructed on the Uplands Public Open Space should be of similar structure and design to those that the land currently borders.	
s.lyon	14823841//1	<p><u>re modification MM3 - Policy SA8 in respect of AM55 & AM14 Development of land south of the Uplands</u></p> <p>The importance of this area of open space to the community has been well documented throughout the consultation process to date. Evidence, some of which has been obtained from the Council archive, records its purchase for the purposes retaining it as open space, (following the rejection of an application to develop the land by the former owner), and its continued use as a recreational area. I understand that at a meeting in May Councillors expressed surprise at its inclusion in the Site allocation plan.</p> <p>The reword policy SA8 set out in this document applies favourably to the Uplands. I would add that the large community of dog owners who use the site on a daily basis contribute to the many local independent businesses. This activity provides social contact and a reason for residents of all ages to take regular exercise throughout the year. Its inclusion by the Town Council of the routes across the Uplands in the Towns footpath map (compiled in conjunction with Nailsea Walkers group) linking it to the Nailsea Round and other areas demonstrates its importance to non dog owners also.</p> <p>Nailsea has very few recreational amenities unlike its sister towns of Clevedon and Portishead. Many people choose to live her because of its access to open space and its proximity to open countryside.</p> <p><u>re modification MM14</u></p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>I am opposed to the development of Youngwood Lane. The road infrastructure is not compatible with this level of development and any additional increase in traffic poses a serious risk to recreational users (cyclists, walkers and horseriders).</p> <p><u>Development on the South West boundary of Nailsea</u></p> <p>large scale development of this area is unsuitable due to an inadequate road network and difficult access to the railway station (rail services are expensive,often unreliable and cramped at certain times). Proposed changes in the Joint Spacial Plan will not effectively address the issue of the commute to Bristol</p>	
David	17725569//1	<p>Ref to AM47 and AM48. As well as maintainence access, pedestrian walk access should be provided/maintained so that there is a green walkway through the town. Also it needs maintaining as a wildlife corridor.</p>	
Sutherland Property & Legal Services Ltd	17824385//1	<p>We wish to object to the retention of the AM96 allocation for land in Kewstoke to be allocated for a new school site.</p> <p>The existing school at Kewstoke is significantly undersubscribed and fit for purpose. It is a 105 place school with only 96 pupils registered. The allocation is carried over from the NSRLP without any review and is no longer tenable nor necessary. At the time it was allocated (10 years ago) it was dependent on a capital funding programme that not only did not deliver the school but is now defunct having been withdrawn in 2010. No funds are available to deliver the school and no school is programmed by the education team.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Further, the land is in private ownership and no agreements nor discussions have ever been undertaken with the landowner.</p> <p>There is no justification whatsoever for retaining this allocation. It is with surprise I note it has not been omitted after the discussions at the May inquiry when it was quite clear that the LPA had failed to justify a range of such community allocations and accepted it was appropriate to simply carry them over. No further assessment, other than receipt of flood warning advice from the IDB appears to have been considered or provided in support of the need to allocate averred by the LPA.</p>	
Yatton Parish Council	3322113//2	<p>Yatton Parish Council wish to comment on the following additional modification numbers:</p> <p>AM69 - The Parish Council are pleased to see the additions under this heading.</p> <p>AM81 - Yatton Parish Council are very strongly of the view that there should be absolutely no provision or eventuality where an access road across the Orchard is allowed.</p>	
Sport England	8126849//2	<p>AM41 - Bournville School site</p> <p>Further to the original response to the 2016 publication version of the Site Allocations, Sport England has a couple of comments to the proposed modifications consultation publication.</p> <p>The site proposed to be allocated for loss to housing is a Playing Field as it contains a playing pitch as shown in this 1999 image (ATTACHED)</p> <p><i>“playing field” means the whole of a site which encompasses at least one playing pitch;</i></p>	 images.docx (223 KB)

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="504 325 1883 427"><i>“playing pitch” means a delineated area which, together with any run-off area, is of 0.2 hectares or more, and which is used for association football, American football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo.”</i></p> <p data-bbox="504 464 1458 496">A rounders pitch and athletics track are shown in this 2005 image (ATTACHED)</p> <p data-bbox="504 533 1861 635">Sport England acknowledges that the NPPF is promoting “sustainable development” to avoid delays in the planning process (linked to economic growth). Thatsaid, the NPPF also says that for open space, sport & recreation land & buildings (including playing fields) paragraph 74:</p> <p data-bbox="504 671 1899 735"><i>Paragraph 74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</i></p> <ul data-bbox="577 778 1899 979" style="list-style-type: none"> <li data-bbox="577 778 1839 842">• <i>an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i> <li data-bbox="577 847 1877 911">• <i>the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i> <li data-bbox="577 916 1899 979">• <i>the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</i> <p data-bbox="504 1023 1883 1125">Sport England’s policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all/part of a playing field, unless one or more of the five exceptions stated in its policy apply www.sportengland.org/playingfieldspolicy</p> <p data-bbox="504 1161 539 1193">E1</p> <p data-bbox="504 1230 1899 1332">“A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport.”</p>	

Respondent Name	Comment ID	Comment	Attached documents
		E2	
		“The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use.”	
		E3	
		“The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of, or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary facility on the site.”	
		E4	
		“The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development.”	
		E5	
		“The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.”	
		<p>Response required – We would expect the site at <u>Former Bournville School site, Sellworthy Road</u>, to meet one of the five exceptions above but in particular E4 - “<i>The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and</i></p>	

Respondent Name	Comment ID	Comment	Attached documents
		<i>of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development.”</i>	
Bleadon Parish Council	8134145//1	<p>Reference AM103 – Community Facilities Schedule (page 84) Topic; Strategic Open Space – West Bridge Road Bleadon; Proposed amendment: Delete the strategic open space allocation; Comment: ‘Land is privately owned and proposal not funded or in any programme.’</p> <p>Bleadon Parish Council objects to any change to the original description of the allocation of the land west of Bridge Road, Bleadon and supports the continual designation of use of the land as being for recreational purposes.</p>	
Barton Willmore	8138721//1	<p>I write on behalf of Linden Homes in respect of their interests at North West Nailsea which is a draft allocation. Whilst we support the allocation of the site, we raised concerns at the Examination Hearings and in our Hearing Statement regarding policy SA1 schedule 1's requirement for a primary school on the site. We provided alternative wording which we are pleased to see has been taken up in the Main Modifications for North West Nailsea which now states:</p> <p>The need for additional primary education capacity is to be considered, including the possibility of a new school on site if required.</p> <p>We support this change which bears a much stronger relationship with the <u>need</u> for a school.</p> <p>For the North West Nailsea site, schedule 1 goes on to make other amendments in respect of surface water drainage as follows.</p> <p>Higher standard of surface water attenuation and run off required. Comprehensive approach to mitigation to protect water quality and drainage in respect of the SSSI. Sufficient space to be allowed for effective access for maintenance of watercourses and surface water drainage features.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>We object to the first and second sentence of this section because it is too vague in its requirements, both for the applicant but also for the Council in determining applications for the development of the site. The guidance on sustainable drainage in North Somerset is defined in the West of England Sustainable Drainage Developer Guide Section 1 (March 2015) - but also within Section 2 (March 2015) which relates specifically to additional sustainable drainage requirements in North Somerset. This guidance already sets out high standards of design for surface water run off attenuation and run off from development sites. In order to overcome our concerns and provide greater clarity on requirements, we suggest that the first and second sentence are amended as follows (new text underlined):</p> <p><u>Higher standard of surface water attenuation and run off required, consistent with the guidance in sections 1 and 2 of the West of England Sustainable Drainage Developer Guide (March 2015).</u></p> <p><u>Comprehensive approach to mitigation to protect water quality and drainage in respect of the SSSI, consistent with the guidance in section 1 of the West of England Sustainable Drainage Developer Guide (March 2015).</u></p> <p>Whilst we have suggested some very minor additions to the Main Modifications, we continue to wholly support the allocation at North West Nailsea.</p> <p>We would be grateful if North Somerset Council continue to keep us informed on the Site Allocations Plan as it proceeds through these final stages, and if you require any further information on our representations, please do not hesitate to contact me.</p>	

Document Section	MM13
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Respondent Name	Comment ID	Comment	Attached documents
Ellandi LLP	17887521//2	<p>MM13: Weston College - Ellandi LLP support the inclusion of this site allocation for retail and restaurant uses at ground floor along with residential development above. However, Ellandi object to the ground floor uses being identified for A1 or A3 uses only. In the interests of providing the centre with an appropriate mix of uses that will add to its future vitality and viability, the policy should identify that the following uses would be acceptable in principle subject to ensuring amenity considerations associated with noise and our are adequately addressed.</p> <p>The uses allocated for the ground floor should include A1, A2, A3 A4 and A5 (where an A5 use is ancillary to an A3 or A4 use), B1,D1, D2 or sui genres uses where these provide similar town centre service uses which add to the centres vitality and viability.</p> <p>Flexibility of uses at the ground floor level is required to ensure that as the major housing growth around Nailsea proposed by the emerging West of England Joint Spatial Plan is delivered, there is a significant opportunity within Nailsea town centre to meet the needs of the increasing resident population. The Weston College site represents a highly sustainable, town centre location to meet these needs thereby benefiting existing and new residents.</p>	

Document Section	MM14
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Respondent Name	Comment ID	Comment	Attached documents
Network Rail (L Bullock)	11517761//1	<p>Thank you for consulting us on the Proposed Modifications for the North Somerset Site Allocations Plan: further residential site assessments. I can confirm that our comments made last year (attached) still stand with the additional comment below.</p>	 2916 comments made on North Somerset proposed modifications.pdf (110 KB)

Respondent Name	Comment ID	Comment	Attached documents
		<p>The Site called ‘Land north of Youngwood Lane, Nailsea’ is near to Grants Mill level crossing which is a public footpath crossing at MLN1 127m 02ch. The speed of the trains on this section of the railway travel at 100mph with approximately 100 passenger and freight trains crossing per day.</p> <p>Any development which would result in a material increase or significant change in the character of traffic using this rail crossing should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.</p> <p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. With this in mind I would strongly urge that when the council undertakes its viability testing for any proposed allocated site it considers the impact the proposal may have on the railway infrastructure. The cost of mitigating any impact may have a bearing on the viability and deliverability of any such proposed site.</p> <p>Please note – the site assessment informs that there is a current planning application ref: 16/1677/OT2. I do not have any record of Network Rail being consulted on this application. Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (Schedule 4 (J) of the Development Management Procedure Order).</p>	
Rob Turvey	14724001//2	<p>For all the reasons described in the earlier consultations, the development of Youngwood Lane should not be considered at this juncture. The adjacent highway network is entirely unsatisfactory, already presenting worryingly</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>unsafe driving conditions. Further, Nailsea's current infrastructure, services and employment provisions are all woefully inadequate for such a significant population increase.</p> <p>However, should the Council continue to remain mindful of supporting this site, then, by way of compensation, it should reconsider its inclusion of the Uplands in the SAP. This site was acquired by the Council over 40 years ago for Public Open Space purposes after it refused the previous land owner permission for an almost identical development to that now proposed by NSC. All the reasons put forward by the Council for justifying the 1976 refusal remain valid and justifiable, and I understand the site is only included as a result of an oversight when auditing Nailsea's green spaces. Sacrificing the 50 planned Uplands Properties in the SAP would be a small price to pay for retaining this highly valued, heavily utilised and health promoting local amenity.</p>	
Richard Lewis	14731809//1	<p>My view with regard to this development is based on the problems relating to the poor road system in gaining access to the A370. The lanes around Chelvey Church are dangerous when there is likely to be an extra 1000 plus cars using these lanes. However if Yougwood Lane is to be added the land south of the Uplands should be removed as it only represents 50 dwellings. I still contend that this land is Public Open Space following the purchase of the lane by Woodspring Council in 1976. This land was considered POS by the Nailsea Town Council but for an oversight in putting forward the field forward for Local Green Space status. The town must maintain its Open Spaces for the benefit of its public. This field south of the Uplands was refused development in 1976 and was subsequently purchased by Woodspring Council. It would be a tragedy if this land was taken from the public for housing with its easy access to Morgans hill.</p>	
Angela Love	14811233//1	<p>If additional housing is forced upon the council for Nailsea, it is imperative that the council takes action to keep and secure existing open space accessible for both existing and additional Nailsea residents:</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Site Allocations Plan examination: further residential site assessments</p> <p>Further to earlier comments submitted to the Inspector and to North Somerset Council on 18 August 2017, I believe that Youngwood Lane should not be included as an additional site for reasons previously stated in response to planning application already received. However, if Youngwood Lane is to be added as an additional allocated site, then I agree with the suggestion of NAG that, as previously requested, the Land South of the Uplands should be removed. With the inclusion of Youngwood Lane, the Uplands site represents a very small proportion of the allocation at only 50 houses. As previously stated in their original response to the Site Allocation Plan, and in their subsequent submissions to the Inspector, the status of this land is contested. At the Hearings in May, the Council representatives conceded that it was surprised that the land was available for the SAP, as it was known to them to have been public open space for many decades. It would appear to have been accidentally omitted from a list submitted from Nailsea Town Council to North Somerset Council identifying public open spaces in Nailsea at the time just prior to the draft SAP's construction. This land has been considered as open space and is used extensively by the public as Open Space. The inclusion of Youngwood Lane as an allocated site further diminishes the "Green Lungs" of the West of Nailsea and increases the need to maintain green open space in this area.</p> <p>I would also be grateful if you could advise whether the Inspector has yet visited the Uplands site as she stated she would do and where I can view her comments following this visit.</p>	
Nailsea Action Group	14823809//1	<p>Further to our earlier comments submitted to the Inspector and to North Somerset Council on 18 August 2017, we believe that Youngwood Lane should not be included as an additional site for the reasons previously stated.</p> <p>However, if Youngwood Lane is to be added as an additional allocated site, then we suggest that, as previously requested, the Land South of the Uplands should be removed. With the inclusion of Youngwood Lane the Uplands site represents a very small proportion of the allocation at only 50 houses. As previously stated in our original response to the Site Allocation Plan, and in our subsequent submissions to the Inspector, the status of this land is contested. At the Hearings in May, the Council representatives conceded that it was surprised that the land was</p>	


Respondent Name	Comment ID	Comment	Attached documents
		<p>available for the SAP, as it was known to them to have been public open space for many decades. It would appear to have been accidentally omitted from a list submitted from Nailsea Town Council to North Somerset Council identifying public open spaces in Nailsea at the time just prior to the draft SAP's construction. This land has been considered as open space and is used extensively by the public as Open Space. The inclusion of Youngwood Lane as an allocated site further diminishes the "Green Lungs" of the West of Nailsea and increases the need to maintain green open space in this area.</p>	
CP30	17685185//1	<p>The development of the land to the south of Nailsea within the boundary of Youngwood Lane is a sensible option and over time could supply in excess of 4,000 residences in North Somerset, the only obvious problem is the road infrastructure which would need considerable upgrading to accommodate the number of vehicles this would generate. This proposal makes more sense than the current proposal to build almost 200 houses on Engine Lane which might actually be useful as a future relief road on the West of Nailsea connecting with the motorway at Clevedon.</p>	
Nailsea Town Council	706241//1	<p>Nailsea Town Council understands the purpose of the document, to meet the Inspector's requirement for additional housing, but it objects to 170 homes at Youngwood Lane as this is contrary to current Town Council policy.</p> <p>The Town Council re-emphasises the need for comprehensive strategic planning for the whole town. This would include a review of the Green Belt, with the objective of realigning the current boundary and increasing the overall area of land designated as Green Belt.</p>	

Document Section	MM16
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Respondent Name	Comment ID	Comment	Attached documents
manager@hubgyms.com	15864257//1	<p>We continue to object to the allocation of the Old Mill Road site for mixed use development including residential. However as a site with significant economic activity we welcome the fact that it will be afforded some protection under amended Policy SA4. Only when the policy criteria are satisfactorily addressed will it be justified to develop the site for an alternative use.</p> <p>Claire Cleeves</p> <p>Owner of The Fitness Hub and Crossit Portishead on Old Mill Road</p>	
Ryan's Garage	15932609//1	<p>Portishead is running the risk of losing its identify and individuality. We can all be the same and life would be very different and offer nothing and a seriously lack opportunities . Everyone wants a lovely home in a good community that offers a great social life balanced with industry this creates self worth motivation and a work to live life style.</p> <p>Residents also want their town to prosper! If further development is allowed then no matter how beautiful Portishead now is . This could be destroyed together with the loss of established businesses by people who have invested their futures in the town. at the cost of established businesses the people that have invested their future in the town . Portishead is a thriving town full of local people who live and work here. Surely we don't want to turn this town into a suburb of Bristol for people just commuting in and out on poor roads to a town that offers nothing.</p> <p>This would make a very poor standard of living for us all.</p> <p>The United Kingdom as it is has lost so much industry in the last 20 years with the likes of</p> <p>Boots selling out to Italy</p> <p>Jaguar selling out to India</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Cadburys selling out to the Americans</p> <p>The national lottery selling out to the Canadians</p> <p>MG Motor Company selling out to China</p> <p>Even London buses are owned and run by Spanish no wonder they are always late!</p> <p>Not to mention Harrods even though the original owner was not born in Britain the business originated in the UK and we all rush to it every Christmas only to line the pockets of Qatar.</p> <p>Is there any surprise that Inflation has just risen to an all time high at 3% and interest rate are being threatened to rise.</p> <p>Our Great Country the United Kingdom has sold off everything we have ever worked for hold dear to our hearts. Leaving us vulnerable and at the mercy of other countries that have protected there national interests and pounced on ours robbing us of our identity.</p> <p>Not a great position to be in when trying to transition our exit from the European Union!!</p> <p>Brexit “Make Britain Great Again “(The UKs Slogan)” it will need more than words.</p> <p>And Whilst getting on the property ladder is almost impossible for first time buyers and rent prices ever increasing , How is the governments initiatives and housing policy targets for north Somerset council to build a further 23000 properties by 2023 solving anything . After all the last time i looked at the plans Standard Life Investments (Phoenix Life Investments Ltd)are not planning on building social housing or budget price properties that first time buyers can afford .</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Instead they are planning to capitalise on Bristol's Growth in the last six years due to London's house prices being unachievable to anyone apart from the elite giving the belief that Bristol's infrastructure is adequate to commutable to London for work whilst getting more value for your money on your family home. This might have been the case 10 years ago. Before too many people bought in to this concept. This will shortly move on to the boarder of Wales! Especially when the French give us back our seven bridges another mistake our government has made!</p> <p>If we were capable of building a first of its kind bridge in 1779 namely the iron bridge in Shropshire **</p> <p>** (A major breakthrough in bridge technology came with the erection of the Iron Bridge in Shropshire, England in 1779. It used cast iron for the first time as arches to cross the river Severn)**</p> <p>Then I'm sure we did not need to sell out to the various developers such as the French and Americans and allow them to profit, this should of been a public service.*</p> <p>**</p> <ul style="list-style-type: none"> • (35% John Laing, British developer infrastructure operator • 35% Vinci, French concessions and construction company • 15% Bank of America, American multinational banking and financial services corporation • 15% Barclays Capital, British multinational investment bank <p>Whilst only showing profits in the uk of £48000 in 2016 annual return to companies house!! And People moan about Google and Face book.</p> <p>Let's get back to the issue. Standard Life the government we elected to run our country and our Local Council are prepared to knock down 23 local and established businesses that employ over 350 Skilled and semi skilled people that live in Portishead for more houses and needless retail properties such as the ones on harbour side that have just received a change of class from commercial to residential. Enough is enough.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>All comments and statement are the views of myself Ryan Peake with information gathered from wikipedia and are with our predjustice and may be in accurate. but to the best of my knowledge i have relayed information i have read and protruded it in complete honesty to the best of my educational ability's</p> <p>Ryan Peake</p>	
Ferenc Vamosi	15937377//1	<p>One word can describe the result of this "development" : disaster.</p> <p>In spite of the promises and claims of the developers, there will be no cinema, the massive retails units will not be taken, so the whole area will be tuned to residential, resulting in 500+ new homes, at least 500 more cars, 500 more kids, who will have no school. The town needs a major infrastructure boost before even considering anything like this.</p>	
patrick Gardner	15978273//1	<p>I cannot understand how the Old Mill Road site has been allowed to have its employment criteria changed from an industrial site of skilled, well paid, full time work, which can enjoy mortgage opportunities, to mixed employment covering the part time, low paid, unskilled occupations such as retailing leisure, cafes, bars and restaurants. These occupations, sadly, will not have the disposable income to make much contribution to Portishead. As suppliers to the Retail and Catering industries we are experienced in how these industries work.</p> <p>The retail proposals illustrated in Standard Life Investments include larger format shops to attract new brands to Portishead. Not only is this unlikely to happen when nearly all larger retailers are cutting back on expansion with the Internet filling this void during a difficult time for retail trading. They should show proof of their analysis. Also, new cafes, bars and restaurants are placed together, this will either reduce numbers in the High Street which already has 6 charity shops or will remain empty. It is common knowledge that developers will then, after about 2 years, request a change to further housing. Which is what Standard Life are planning. There are already precedence in Portishead in part of the Marina development.</p>	<p> Letter Graham Quick 5.11.17.doc (661 KB)</p>

Respondent Name	Comment ID	Comment	Attached documents
		<p>Without another major road out of Portishead, the cars that this development will encourage plus other local developments will create so much misery, not including the pressure on other services, that Portishead will no longer be a desirable place to live.</p> <p>Patrick Gardner, T&G Woodware Ltd 9-11, Old Mill Road</p> <p>Additional comments received 05/11/17, attached</p>	
patrick Gardner	15978273//2	<p>Under the notes: Site Specific Details it declares "Existing businesses to be relocated or incorporated into redevelopment scheme". As a leaseholder in Old Mill Road, I can say that the plans presented, which have been produced long after the above stipulation was made, making this action impossible without redrawing the plans. A recent meeting with the Principal Economic Development Officer and a representative of Standard Life, their Town Planning advisors, GL Hearn, indicate that this process is being applied by Standard Life with NO intention to meeting this criteria. Now it is up to the Executive Committee on Planning to decide this development is not "good for Portishead. There is little trust that Standard Life will meet their Social Obligations and are paying Lip Service to the expectations of the Council!</p> <p>The Site Specific Details go on to state: "No net loss of employment capacity will be supported". When questioned that Standard Life/GL Hearn have declared a possible 600 jobs in this development they are insulting our intelligence. OLD MILL ROAD is nearly at full capacity without any houses and supports close to 355 jobs. The proposed retail element in the proposed development is wishful thinking. Jobs could be increased if everyone could only work one day a week but this is also nonsense. However, it is the sort of statement that we are hearing from the developers. In other words, like governments, they cannot guarantee any new employment at a retail level, especially when any real retail growth is taken by the Internet. At our recent meeting, when GL Hearn when questioned: where are the 600 jobs coming from? they feigned ignorance to this statement. Fortunately, the Economic Development Officer reminded him that he had made this declaration at a past meeting. These developers, in their attempt to push their plans forward cannot be trusted to be honest. The council should beware of false promises when making decisions.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		Patrick Gardner	
Standard Life Investments	16123553//2	<p>The Inspector's letter (ID4) set out that the SAP Publication Version would fail to deliver the Core Strategy housing requirement, or ensure North Somerset Council could maintain a 5 year housing land supply.</p> <p>To address this the Inspector expected the Council to test the potential for the provision of up to 2,500 additional houses. The Council's response to the Inspector's letter has been to test potential housing allocations, including sites which are "<i>broadly consistent with the Core Strategy spatial strategy</i>", from which the Council proposes the allocation of an additional 821 residential units.</p> <p>This falls significantly short of the target expressed by the Inspector, does not provide the required significant buffer between the Core Strategy requirement and provision within the SAP and is unlikely to address the fundamental concerns that the SAP will fail to deliver the Core Strategy housing requirement to 2026 or to ensure that the Council can maintain a 5 year housing land supply. This is illustrated by the Council's evidence set out by CD4a, dated September 2017, which indicates a 5 year housing land supply (2017/18 to 2021/22) of 9149 dwellings, or 4.8 years. That in itself determines that the plan cannot be found sound.</p> <p>It is also evident that in reaching its proposed additional 821 dwellings, the Council has not exhausted all sources of potential housing supply. The Council's assessment criteria, outlined by the Inspector at paragraph 24 of ID4, include "<i>sites which area broadly consistent with the Core Strategy spatial strategy</i>". These sites are listed at CD2a and include Old Mill Road, Portishead.</p> <p>As part of the Council's site assessment process, SLI submitted information (June 2017) to the Council confirming arrangements to bring the site forward (for mixed-use development, including 350 dwellings) and the anticipated build rate trajectory for the proposed residential element of the redevelopment proposal.</p> <p>Further comments were provided to the Council in August 2017, in response to the Council's 'Further Residential Site Assessment' consultation. That response challenged the Council's assessment that 'retention of</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>existing businesses' was a key constraint to the residential potential of the site, and re-confirmed SLI's desire to engage with the Council through the development management process to bring forward detailed development proposals, including a significant residential element alongside commercial town centre uses.</p> <p>The main modification (MM16) to amend the wording of Schedule 1 by replacing "<i>a small amount of residential</i>" with "<i>some residential</i>", does not reflect the residential suitability and potential of the site and, critically, appears to be a modification designed to try and accommodate the town centre site's in principle suitability for residential use without contradicting the Council's employment (Class B1-B8) policy stance set out MM2.</p> <p>Additionally, the term 'some residential' although undefined, is likely to be applied in the context of its usual meaning and therefore be interpreted in practice as substantially less than 350 units (or the potential residential capacity of the site to be established following engagement with Council through the development management process). This likelihood is strengthened by the proposed modification within Column 4 of Schedule 1 ("<i>Capacity remaining (at April 2017)</i>") which proposes identifying 'zero' capacity for the Old Mill Road site.</p> <p>The Council's justification for MM16 is provided by the Council's Executive (5th September 2017), the officer's report for which outlines that the provision of 350 residential units at the site, as part of a redevelopment proposal, was not supported "<i>given the need for any redevelopment to accommodate existing businesses on the site</i>" and that there was "<i>no convincing evidence that this is deliverable in 5 years</i>" (NSC Report to the Executive, 5th September 2017).</p> <p>In respect of the site's exclusion on the grounds that redevelopment of the site will "<i>need</i>" to accommodate existing businesses on the site, this requirement is not substantiated by any evidence and can be considered contrary to adopted policy (see comments in respect of MM2 above). In any event, the Council's proposed Schedule 1 text does not require existing businesses to be accommodated on the site, but rather also accepts the potential for existing businesses to be relocated.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>The conclusion of the Council in respect of the deliverability of the site is not supported by any evidence and is contrary to the evidence provided by SLI in response to the Inspector's request (paragraph 25 of ID4) for the Council to work closely with the development industry to identify potential opportunities for additional residential development.</p> <p>The residential potential of the Old Mill Road site should not be limited by arbitrary and unsupported judgements about the potential capacity of the site, or by the use of terminology that in its normal meaning will imply considerably fewer residential units than the site can, and should, provide. Rather Schedule 1 should recognise the suitability and potential of the site to make a significant contribution to identified housing requirements, as part of a mixed-use development, in line with national and adopted policy.</p>	
Ryan Peake	16133313//1	<p>Portishead is running the risk of losing it's identify and individuality, we can all be the same and life would be very different and offer nothing and a seriously lack opportunities . Everyone wants a lovely home in a good community that offers a great social life balanced with industry this creates self worth motivation and a work to live life style.</p> <p>Residence also what their town to prosper! However at this rate regardless how beautiful Portishead is now if further development is allowed at the cost of established businesses the people that have invested their future in portishead only to commute in and out to work so service there mortgage payments only to put their heads down and go again great standard of living?</p> <p>The United Kingdom has lost so much industry in the last 20 years with the likes of</p> <p>Boots selling out to Italy</p> <p>Jaguar selling out to India</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Cadburys selling out to the Dutch</p> <p>The national lottery selling out to the Canadians</p> <p>MG Motor Company selling out to China</p> <p>Even London buses are owned and run by Spanish no wonder they are always late!</p> <p>Not to mention Harrods even though the original owner was not born in Britain the business originated in the UK and we all rush to it every Christmas only to line the pockets of Qatar.</p> <p>Is there any surprise that Inflation has just risen to an all time high at 3% and interest rate are being threatened to rise.</p> <p>Our Great Country the United Kingdom has sold off everything we have ever worked for hold dear to our hearts. Leaving us vulnerable and at the mercy of other countries that have protected there national interests and pounced on ours robbing us of our identity.</p> <p>Not a great position to be in when trying to transition our exit from the European Union!!</p> <p>Brexit “Make Britain Great Again “(The UKs Slogan)” it will need more than words.</p> <p>And Whilst getting on the property ladder is almost impossible for first time buyers and rent prices ever increasing , How is the governments initiatives and housing policy targets for north Somerset council to build a further 23000 properties by 2023 solving anything . After all the last time i looked at the plans Standard Life Investments (Phoenix Life Investments Ltd)are not planning on building social housing or budget price properties that first time buyers can afford .</p>	

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		<p>Instead they are planning to capitalise on Bristol's Growth in the last six years due to London's house prices being unachievable to anyone apart from the elite giving the belief that Bristol's infrastructure is adequate to commutable to London for work whilst getting more value for your money on your family home. This might have been the case 10 years ago. Before too many people bought in to this concept. This will shortly move on to the boarder of Wales! Especially when the French give us back our seven bridges another mistake our government has made!</p> <p>If we were capable of building a first of its kind bridge in 1779 namely the iron bridge in Shropshire **</p> <p>** (A major breakthrough in bridge technology came with the erection of the Iron Bridge in Shropshire, England in 1779. It used cast iron for the first time as arches to cross the river Severn)**</p> <p>Then I'm sure we did not need to sell out to the various developers such as the French and Americans and allow them to profit, this should of been a public service.*</p> <p>**</p> <ul style="list-style-type: none"> • (35% John Laing, British developer infrastructure operator • 35% Vinci, French concessions and construction company • 15% Bank of America, American multinational banking and financial services corporation • 15% Barclays Capital, British multinational investment bank <p>Whilst only showing profits in the uk of £48000 in 2016 annual return to companies house!! And People moan about Google and Face book.</p> <p>Let's get back to the issue. Standard Life the government we elected to run our country and our Local Council are prepared to knock down 23 local and established businesses that employ over 350 Skilled and semi skilled people that live in Portishead for more houses and needless retail properties such as the ones on harbour side that have just received a change of class from commercial to residential. Enough is enough.</p>	

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		<p>All comments and statement are the views of myself Ryan Peake with information gathered from wikipedia and are with our predjustice and may be in accurate. but to the best of my knowledge i have relayed information i have read and protruded it in complete honesty to the best of my educational ability's</p> <p>Ryan Peake</p> <p>Ryans Group Of Companies</p> <p>Unit 6 , 8 , 14 Old Mill Road</p> <p>Portishead</p> <p>Bristol</p> <p>BS207BX</p> <p>Tel 01275 849 981</p> <p>www.ryansgroupofcompanies.co.uk</p>	
Ali Price	17467393//1	<p>Old Mill Rd development is NOT NEEDED.</p> <p>There is no road infrastructure to support the increase in housing. Including M5 access.</p> <p>There is no planned increase in schools or health care provision for the increase in population.</p> <p>There is NO guarantee of the rail link being constructed to Portishead, it is at consultation phase.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>There is no guarantee that so called “major retailers” will locate in the development. Other failures (Dolphin Sq in WSM) bare testament to this.</p> <p>The viable and valuable business already in the location should remain.</p> <p>The consultation process (question cards) is selective and and unrepresentative. There should be an option to select “*Development not wanted”, rather than listing things residents “might want”.</p> <p>The landowners are merely trying to sell the land to developers for the maximum profit. There is no requirement for any of this development in Portishead.</p>	
HHGL	17696289//1	<p>My clients, HHGL Ltd (the trading name for Homebase and Bunnings in the UK & Ireland) support the changes made to the Old Mill Road site allocation. However, given that the owners of this site, Standard Life, have confirmed that the existing Wyndham Way Retail Park, which includes the Homebase store, will be retained as is, this store and the other retail stores within this Park should be deleted from the allocation. As the Retail Park will not be subject to any redevelopment proposals there is no justification or reasoning for retaining it within the boundary of the Old Mill Road site allocation.</p>	
The Hughes Family	17712161//1	<p>We wish to record our complete disapproval of the plans to develop Old Mill Road. It would be a travesty to destroy the existing business that are well established and have brought employment to Portishead. The existing infrastructure is not appropriate to sustain more houses and the additional cars that would inevitably follow. It is difficult enough to leave and return to Portishead during rush hours without more traffic. There is no where else for the businesses to establish themselves so they would be lost to Portishead and the plan is to replace them with stores that are already established in Cribbs Causeway which are not local to Portishead. Local people will suffer if this development is allowed and we hope the Council will support the local businesses and the people of Portishead and refuse the proposed development</p>	

Respondent Name	Comment ID	Comment	Attached documents
Dr Andrew Morrison	17715905//1	<p>You are doubtless already deluged with emails on this topic. However, I'd like to add my objection to any redevelopment of Old Mill Ed in Portishead.</p> <p>Decent jobs in Portishead is vital if we are to be a distinct and cohesive town rather than a commuter town for Bristol. Getting rid of 300 job would be crazy and only benefit the land owners profits.</p> <p>I'd add that additional traffic in/out of Portishead is also not acceptable. In particular we still have no firm commitment to the rail link we expected when the Ashlands were developed and we cannot go on building until this is actually delivered.</p> <p>Regards</p> <p>Dr Andrew Morrison</p>	
M Dilloway	17723713//1	<p>I would like to register my opposition to the plans to redevelop old mill road. All the businesses along the road are unique within the town and offer a service that couldnt be done elsewhere in the town as there are no alternative sites. Also as a business owner on the high street my opinion is that the new retail units will on detract peoples attention from the already quiet high street and will certainly have a detrimental effect. We will not only loose the businesses on Old Mill Road but also a number of high street businesses.</p>	

Respondent Name	Comment ID	Comment	Attached documents
Jones	17727969//1	<p>I would like to express my complete objection to the redevelopment plans for Old Mill Road. Portishead cannot cope with any more housing. We do not have the current infrastructure in place to be able to cope with any further additional housing or traffic and what that subsequently brings ie even more pressure on school places, doctors etc. The businesses currently on Old Mill Road provide jobs and income and we should be looking to secure these not take them away. The Council has to refuse this proposal and start supporting the local community.</p>	
Michael Parker	17731265//1	<p>Dear North Somerset Planning</p> <p>Does North Somerset have a Planning Policy for Portishead?</p> <p>Sites designated for employment are released for more housing because businesses cannot be found to relocate to Portishead because of the inadequate transport links.</p> <p>Businesses located in Portishead are forced to close to release more sites for housing.</p> <p>For a town with insufficient school places for its population because the local authority cannot provide more schools.</p> <p>For a town with inadequate transport links because reopening the railway is postponed yet again.</p> <p>Old Mill Road could provide a vibrant link between the High Street and the Railway Station/Marina, but not at the cost of the existing successful businesses of Portishead.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>What is needed is coherent Planning Policies in place of short term grasping after Housing Developer cash.</p> <p>Kind regards,</p> <p>Michael Parker</p>	
Sarah Mattison	17736705//1	<p>I wish to state my support for saving Old Mill Road for the local enterprises which are currently there and serve the town of Portishead and employ many people.</p> <p>I do not want more housing built in a part of town which is in the heart of the community. It will further add to make the local roads more chaotic and drain other resources such as schools and doctors.</p> <p>We need more local businesses in our town and fewer chain stores.</p> <p>I urge you to consider any plans carefully.</p> <p>Kind regards</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="651 328 831 352">Sarah Mattison</p> <p data-bbox="651 395 875 419">Portishead resident</p>	
Derek DeVote	17795617//1	<p data-bbox="651 584 1957 751">I am writing to express my concern at the Standard Life Investment Co. proposal to replace the existing 20 or so businesses in Old Mill Road with large retail units and 350 houses. This would replace some 370 mainly skilled jobs with a smaller number of lower paid semi and unskilled ones. Some existing companies provide training for apprentices in skilled work - this proposal would reduce the local availability for such training. We already have sufficient shopping facilities both in Portishead and within a short drive.</p> <p data-bbox="651 794 1957 927">The additional traffic which would result from the added housing plus those people displaced from skilled jobs and living in Portishead would cause gridlock in and out of Portishead twice a day. So, if Standard 's plan were to be approved it should surely be conditional on their paying for additional road works with a bridge over the roundabout to Bristol and a by-pass from Sheepway.</p> <p data-bbox="651 970 1939 1034">I am sure you are aware that Portishead is already short of school places and the health centers are under great pressure to provide services - the proposed extra houses would add to these problems.</p> <p data-bbox="651 1077 1608 1101">Given these concerns I ask you to refuse the proposal should it ever be put to you.</p> <p data-bbox="651 1144 1021 1168">Yours faithfully, Derek Devote.</p>	

Respondent Name	Comment ID	Comment	Attached documents
Colin Hughes	17795649//1	<i>I hope that you take notice of the people of Portishead for a change!!! as you don't appear too in the past. How on earth can you prefer to build more houses on Old Mill Road instead of leaving things as they are. The population of this town is growing at an alarming rate and you don't appear to worry about it. There are enough problems getting in and out of Portishead without stupid ideas of making the situation worse!!! or are you councillors blind to the situation and could not care less about the wishes of the population!!! You should do, as when the next election comes along we will have a totally new council.</i>	
Michael Selby	17824289//1	<p>I wish to object strongly to the proposal to turn Old Mill Road Portishead into a retail park with over 300 houses. DO YOU REALLY WANT TO COMPLETELY GRID LOCK PORTISHEAD. Its bad enough getting in and out now I shudder think what it would be like if this proposal goes ahead.</p> <p>The events during the last 2 weeks should be enough to convince you that to introduce a potential of an extra 700 cars into the already grid locked one way street into our town.is very very bad news.</p> <p>PLEASE STOP THIS MADNESS HAPPENING</p>	
Steve Gillingham	17884129//1	<p>To the people who hold the future of Portishead in their hands, please listen to the residents of Portishead and their concerns regarding the prosed development of Old Mill Road.</p> <p>Collectively, you will determine the future of Portishead, your decisions should not just be based on what is before you today, but with the view of the longer term benefits of the future generations of the town. The decision on granting planning permission for redevelopment of this site is one that will carry implications for many, many years.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Whilst Portishead is an affluent area with very good demographics, nobody knows what the future will hold, but once the bulldozers and brick layers are in, there is no going back - visualise if you will, rows of empty retail shops, streets crammed with cars parked on pavements, queues at the health centres and parents of school children fighting for places for their little ones.</p> <p>None of this needs to happen - I note from consultations MM17, MM18 and MM19 these all make reference to residential development, and I am really concerend for the future stability of the town I live in.</p> <p>Your consultation document makes reference to 'existing business to be relocated or incorporated into the development" - the inference in this statement is that business will be assisted in relocation to alternative sites whilst the new development occurs - how will this be funded, who will support the costs of relocation a gym with bundrds of members to another building? How will a steel fabrication business be relocated locally, and should these business wish to return, will a new warehouse/factory be incorporated in the development plans? Too many questions I guess that will need very, very careful consideration and specific answers before residents and business owners are satisfied.</p> <p>Your consultation document also states 'no net loss of employment capacity will be supported' - what reaction would you expect from a skilled mechanic who is told, 'don't worry, you will be able to work in the new shops'. The aforementioned statement infers that even the loss of one job will see any planning application not supported, unfortunately we will only fully understand how many jobs have been lost and not replaced once the development is complete and the retail units are fully operational - too late for the mechanic and his colleagues.</p> <p>Once again, you all hold the future stability of Portishead in your decision making, the short term housing needs, the medium term residential and business needs, and the longer term strategy for forthcoming generations. Please do not let the taxpaying residents, businesses and employees of Portishead down, you stood for election and were voted into your positions by the very people that will have their futures determined by you and your colleagues.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>You must do what is right in your judgement, but you must also be honest with your opinions and your conscience.</p> <p>Thank you for taking the time to read my comments.</p> <p>Steve Gillingham</p>	
Andy Cleeves	17887425//1	<p>My organisation runs from the large Hub premises on Old Mill Road running Martial Arts for kids aged 4 through to adults. We have World Champion athletes in the Club and the facilities are established for our use. We continue to object to the allocation of Old Mill Road site for mixed use and residential development. We welcome protection under amended Policy SA4. Thriving businesses providing health and fitness need to be protected.</p>	
T Fowler	17887457//1	<p>Old Mill Road is home to successful, sustainable businesses, providing the town of Portishead with jobs and training for skilled and semi skilled workers. Developers are destroying the very identity of the town, removing employment opportunities and building so many homes that the infrastructure can no longer cope. Hundreds of years have been spent developing a town that people were envious of, it had everything going for it. Now greed, lack of understanding and certainly lack of forward thinking are destroying this coastal town.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>PLEASE STOP any further development, especially to the detriment of employment opportunities in this town. It has become the 'norm' for developers to promise commercial premises, then to poorly market those commercial premises and over price them so that it attracts no interest, and then turn it in to housing. Come on, this town has had enough.</p> <p>Our roads cannot cope, our public services cannot cope and to remove successful on-going businesses in the name of more homes is outrageous.</p> <p>In addition, our independent retailers are disappearing with our High Street shops already struggling. Place more retail units out of our High Street and you are signing its death warrant. More homes are destroying our community.</p>	
GKirton	17892961//1	<p>I am completely AGAINST this proposal. It is absolutely ludicrous. We do NOT need anymore house or flats. The infrastructure in Portishead is already at capacity and cannot support another unnecessary increase. Also schools are at capacity and doctors surgery. This proposal is completely unnecessary and is displacing well established businesses which should NOT be displaced just because the land owner is trying to make a profit!! Please do not allow this to go ahead. Portishead cannot support this. Instead we need more investment in roads/transport and other basic needs - schools and doctors.</p>	

Document Section	MM17
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Respondent Name	Comment ID	Comment	Attached documents
Jones	17727969//2	I would like to express my complete objection to any residential housing on this site. Portishead cannot cope with any more housing developments. Our current infrastructure cannot support any further additional housing and traffic. There are already not enough school places, employment opportunities, doctors etc for the current population. The town cannot cope with any further increase in traffic, which is inevitable with more houses. The Council must reject any further housing development and concentrate on supporting the local community and the people of Portishead.	

Document Section

MM2

Respondent Name	Comment ID	Comment	Attached documents
Wrington Parish Council	1019201//2	<p>Policy SA4 – Employment Allocations</p> <p>We note the <i>'factors that have been assessed to determine the suitability of each employment allocation'</i>, para 4.30. However, we are not convinced these were all fully assessed in relation to the extension to the Havyatt Business Park. This is shown in blue on the policies map related to MM62.</p> <p>While this might not appear as a proposed change, it is difficult to see how any extension to the existing built development at the Havyatt Business Park could be justified, bearing in mind the impact on the flood plain and the increased flood risk created directly or by displacement from potential development on this site.</p> <p>Also, any further development would add to what are already significant traffic and transport issues on the narrow access roads, and within the village centre, as a result of the considerable HGV and other traffic movements related to the industrial estates. It is recommended that the site boundary is now fixed and with the area shown in blue deleted.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>It is our understanding that most people who work on the village industrial estates drive into Wrington in the morning and home again at night, passing local residents travelling in the opposite direction. This is not sustainable development. A related issue is our understanding that First Bus has stated that the A2 bus service is not commercially viable and withdrawn funding. While the service is being funded temporarily by NSC, these employment sites can no longer be considered to be accessible by a reliable public transport service. No further development should be permitted on this visually exposed countryside site.</p>	
Standard Life Investments	16123553//1	<p>This proposed main modification seeks to combine Policies SA4 – 6 of the SAP Publication Version into a single policy. In practice MM2 constitutes a complete re-draft of the employment section of the SAP Publication Version and introduces new policy that conflicts with both the policy and the sentiment of the Core Strategy.</p> <p>SAP Publication Version Policies SA4, SA5 and SA6 respectively apply to land allocated for new business development (SA4), existing employment sites (SA5) and land in existing economic use (SA6). Policies SA4 and SA5 are each supported by a schedule (Schedules 2 and 3 respectively) which define the sites allocated for new business development (Schedule 2) and existing employment sites safeguarded for business development (Schedule 3). The specific terminology used for each policy is significant. Whereas SA4 and SA5 both define ‘business development’ as comprising Use Classes B1, B2, and B8, Policy SA6 applies explicitly to land in existing "<i>economic use</i>" and which therefore encompasses a wider range of uses than solely Class B1, B2 and B8, with the criteria of Policy SA6 therefore applied on that basis. Additionally, Policy SA6 sites are not identified or defined within a schedule.</p> <p>MM2 fundamentally changes this policy approach by referring specifically, and therefore applying specifically (other than if otherwise set out in proposed Schedule 2), to B1–B8 ‘business employment areas’ and setting criteria for non B1–B8 development.</p> <p>This approach does not align with Core Strategy Policy CS20, which refers variously to ‘employment opportunities’, ‘economic development’ and ‘economic use’, but does not define any of these as being limited to B1 – B8 uses only.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Moreover, the inclusion of "<i>B1 – B8 business employment areas</i>" within the policy will mean that criterion i) of SA4 (MM2) could not be satisfied unless existing employment areas are specifically defined. However, there is no schedule defining existing employment areas proposed by the Main Modifications.</p> <p>Criterion i) of SA4 (MM2) requires the proposed redevelopment of any Class B1–B8 use to a non B1–B8 use to demonstrate that there would be no harm to the range or quality of land and premises available for business use within existing employment areas. In the absence of defined employment areas, compliance with criterion i) is unachievable because the loss of an existing B1–B8 use would by definition harm the range of land and premises available for business use. Additionally, because Policy SA4 (MM2) requires all criteria to be demonstrated the automatic failure to demonstrate compliance with criterion i) would render the remaining criteria obsolete. That cannot be the intent or purpose of Policy SA4, and does not accord with the Core Strategy, including Policies CS20, CS21 and CS31, or national policy.</p> <p>Criterion iii) of SA4 (MM2) includes the term ‘incompatible development’ but there is no definition of ‘incompatible’ despite the significance of the term to the consideration of potential redevelopment proposals that offer regeneration and economic growth – such as envisaged by criterion iv) of SA4 (MM2) – as well as significant environmental, amenity and sustainability benefits. Hence whilst the second-half of criterion iii) recognises sustainable development benefits arising from the redevelopment of a site can outweigh its Class B1–B8 employment use, that recognition is only triggered if the site is either "<i>no longer capable of offering accommodation for business use development</i>" or the site’s existing use is deemed ‘incompatible’.</p> <p>In respect of the capability of a site to offer accommodation for business use development, the effect of this requirement would be to preclude existing Class B1–B8 sites from redevelopment, irrespective of whether such redevelopment provided economic growth, sustainable development, mixed use development or other objectives of national policy or the NSC Core Strategy.</p> <p>The effect of Criterion iii) of SA4 (MM2) therefore is to impose inappropriate and unjustified constraints on the delivery of Core Strategy objectives and policy. That cannot be considered sound.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>As a minimum before SA4 could be considered sound ‘existing B1 – B8 business employment areas’ should to be defined and the policy criteria reviewed and re-drafted to provide criteria that accord with the Core Strategy; are relevant to the matter to which they are intended; are coherent; and, applicable individually rather than collectively.</p> <p>Additionally, the definition of existing B1-B8 business employment areas to which Policy SA4 (MM2) would then apply must recognise the objectives of the Core Strategy and existing adopted policy designed to deliver those objectives, including Policies CS21 and CS31 of the Core Strategy and Policy DM60 of the Sites and Policies Plan, Part 1.</p> <p>Policy CS21 of the Core Strategy encourages and supports the regeneration of town centres, including Portishead, providing proposals meet criteria relating to:</p> <ul style="list-style-type: none"> • The scale of the development relative to the size and role of the centre; • The creation of a comfortable, safe, attractive and accessible shopping environment; • Improve the mix of town centre uses. <p>CS21 also sets out that retail centres will be defined "<i>exactly</i>" by the Sites and Policies DPD, with the purpose of retaining "<i>the predominance of town centre uses in general and retail uses in particular.</i>"</p> <p>Policy CS31 of the Core Strategy provides the ‘area policy’ for Portishead as well as the other town centres of Clevedon and Nailsea. The policy requires Portishead to "<i>maintain and enhance</i>" its role providing facilities, employment opportunities and services. Alternative uses on existing employment sites are accepted "<i>where they are shown to address other identified community benefits and do not have an adverse impact on the quality and range of sites and premises available for business use</i>".</p> <p>It must be the case that regeneration within Portishead Town Centre, providing new retail and an improved mix of town centre uses, as expected, encouraged and supported by Policy CS21, cannot be effectively nullified by either Policy CS31 or by proposed SA4 (MM2).</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Additionally, Policy DM60 of the adopted NSC Development Management Policies: Sites and Policies Plan, Part 1, says proposals for main town centre uses within the town centre will, in principle, be supported provided they contribute to the improvement of the town centre. Whilst ‘improvement’ in the context of the policy is not specifically defined, Policy DM60 provides criteria against which proposals are expected to be assessed, including:</p> <ul style="list-style-type: none"> - Increase the activity and footfall in the centre, including supporting the evening economy - Secure the redevelopment or improvement of buildings, features or areas which detract from the quality or appearance of the centre - Enhance the mix or quality of uses at the centre - Enhance the built environment and public realm - Do not prejudice the delivery of proposed redevelopment schemes - Retain or increase the amount and quality of public car parking spaces available <p>Notably there is no criterion relating to the protection of (or otherwise resisting the loss of, or requiring re-provision for) existing Class B1–B8 uses.</p> <p>SA4 (MM2) should therefore either not apply to town centre sites, or should recognise that within town centres different criteria will apply to the potential loss of existing B1–B8 uses.</p> <p>Specifically in respect of the Old Mill Road site, MM2 introduces new policy that would be applicable to the site (albeit the proposed policy will be inconsistent with both core policy and the principles of the use of the site for mixed use as set out by emerging SAP Schedule 1) the effect of which will be to negate the site’s economic development potential, preclude the delivery of Core Strategy objectives and policy and unnecessarily put at risk the delivery of the Old Mill Road</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>site for mixed-use development appropriate to its town centre location and including the delivery of a significant number of new dwellings.</p> <p>Schedule 1: Old Mill Road</p> <p>The only proposed modification to Schedule 1 in respect of the Old Mill Road site set out by the main modifications documents concerns a change to the text describing the quantum of residential at the site. In respect of employment provision, Schedule 1 retains a requirement for "<i>existing businesses to be relocated or incorporated into redevelopment scheme</i>" and that "<i>no net loss of employment capacity will be supported</i>" which was introduced as a proposed modification to Schedule 1 by SD20, but which has not been subject to any formal consultation.</p> <p>Neither MM2 and its implications for the Old Mill Road site, or the continuing inclusion of the specific employment related wording for the Old Mill Road site within Schedule 1, is supported by any evidence demonstrating or justifying the Council's intentions to protect Class B uses at the site. No evidence was evident prior to the submission of the SAP Publication Version, and no evidence has been provided through the examination process or the main modifications exercise.</p>	
McCarthyand Stone Retirement Lifestyles Ltd	17860001//1	<p>The removal of the draft schedule 3 of safeguarded employment sites and a more positive re-wording of policy SA4 to allow a considered case to be made on a site by site basis is welcomed as being more in line with NPPF guidance. However the drafting should acknowledge that many good employment uses fall outside of the B1 – B8 employment sector and yet still provide important employment, economic and social opportunities. Many of these can sit alongside other employment and residential type uses such as healthcare and extra care meeting the aims of wider objectives of the Local Plan.</p> <p>Similarly there are some sites which may have an existing or former employment B class business use that could provide wider social, health and economic benefits that do not necessarily require a B type use to remain on the site.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="517 328 1935 392">It is recommended that further consideration is given to the drafting to reflect this in part (iii) with the balance of weight given to alternative but none the less significant alternative uses.</p> <p data-bbox="517 703 1957 1262">The Council, as part of its requirement to consider additional residential sites post the EIP for the site allocations DPD undertook an assessment of extra sites that had been promoted and considered in September 2017. One such site at 173 and 175 Kenn Road Clevedon was considered and rated highly against most site and sustainability criteria (Report to Committee 5th September 2017). In that assessment reference was made to a couple of Amber issues namely flood zone as in the case of a significant part of Clevedon and other allocated sites and secondly on the proximity to the service yard of the Tesco superstore. As has been set out in the formal representation thus far the 173-175 Kenn Road site is already located in a primarily residential area and any site constraints are capable of a detailed design and layout response. The response and justification for rejecting the site are considered weak and unjustified. The value of the site for a residential led scheme in a highly sustainable location should be given greater weight and included on a par with other sites, some of which had employment implications. Attention is again drawn to the representations made with the draft DPD as to the benefits of including this site equally for residential This is a site with a willing vendor and developer to deliver residential uses in the immediate 5 year period. This would not be a speculative residential scheme. A specific specialist developer would be providing much needed extra care and retirement living accommodation to meet a known housing need in one of very few sites available which meet the criteria for older persons housing. I would ask therefore that this site is indeed included for a residential led scheme in the interests of wider objectives of the Local Plan.</p>	

Respondent Name	Comment ID	Comment	Attached documents
Ellandi LLP	17887521//1	<p>Policy SA4 requires additional text to make it clear that any alternative proposals for retail uses will be subject to the sequential and impact tests set by Policy DM66 and DM67 of the North Somerset Sites and Policies Plan. It should also confirm that other town centre uses, such as gyms and restaurants will equally be required to adhere to the requirements of the sequential test set by Paragraph 26 of the NPPF and for leisure uses above 2,500 sqm an impact assessment will also be required in accordance with Paragraph 27 of the NPPF.</p> <p>The above additions are necessary because at present the North Somerset Sites and Policies Plan is deficient (silent) in relation to the application of the sequential and impact tests for town centre uses other than retail.</p> <p>In addition, it would be appropriate to set out that the development plan supports a town centre first approach therefore where town centre uses are sought having demonstrated that criteria i-iv of Policy SA4 are met, these uses should only ever be to provide a supporting function for the immediate area and not provide a draw beyond this local function.</p>	
Tesco Stores Ltd	17920129//1	<p>Please find below my representations submitted in respect of the current consultation on the main modifications to the Site Allocations Plan on behalf of my clients Tesco Stores Ltd.</p> <p><u>Employment Policy Revisions</u></p> <p>Whilst it is welcomed that the schedule of protected employment sites has been removed from the emerging plan consultation documents in favour of an approach in line with that advocated by the NPPF it is of some concern that the Council continues (contrary to the approach adopted within national guidance)not to recognise the merits of non B class uses in terms of their potential employment generating benefits. We would suggest that the policy is re-visited to allow for a recognition of non B class uses and the important role they can perform in employment generation.</p>	

Respondent Name	Comment ID	Comment	Attached documents

Document Section	MM21
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Respondent Name	Comment ID	Comment	Attached documents
Yatton Parish Council	3322113//1	Yatton Parish Council wish to add their support for the concerns raised by Congresbury Parish Council regarding the access to this development and its close proximity to the Smallway junction. The junction has historic problems with accidents and serious congestion which have a direct impact on Yatton and beyond and although this development has been approved, North Somerset Council are urged to investigate further what can be done to address and alleviate the Smallway junction.	

Document Section	MM22
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Respondent Name	Comment ID	Comment	Attached documents
G C J Ballard	17751841//1	Ref: NS Site Allocation Plan Coombe Farm/Slough Pit I am writing to ensure you and the Inspector are fully aware of the circumstances in regards to Government rejection of previous application. Also access is now on to Shipham Lane necessitating removal of ancient hedgerow (Vince Russett NSC Officer).	

Respondent Name	Comment ID	Comment	Attached documents
		<p>An appeal took place on 29th February ref T/APP/D0121/A/99/1032385/P2 Inspector Colin A Thompson.</p> <p>Shipham Lane remains a narrow lane which up to 50 yards from this site is de-restricted (national speed limit 60mph).</p> <p>Any comments that I noted from original notification of 'allocation' that 'there was no previous objection to this site' were in error.</p> <p>Please ensure all concerned are aware of this response.</p> <p>G C J Ballard</p>	
sstockwell	17904513//1	<p>Please see my comment entered in relation to Broadleaze Farm, Winscombe, at MM24.</p>	
Cresten Boase	5118977//1	<p>There will be a disproportionately damaging, and far-reaching effect if the Shipham Lane site is allocated. The site allocations map does not show the AONB, and part of this site encroaches on the AONB. We are already experiencing a number of applications for stand-alone housing in the AONB surrounding Winscombe. One, centring on a large new dwelling on the site of an old summerhouse, in a wooded location, has recently been consented. This sets a precedent for others to be let through. However sustainable the design might be, these buildings will not enhance the natural beauty of the landscape, nor will they conserve it. A large housing estate, not necessarily with many sustainable features, with only 30% affordable housing, and allocated by the local authority, even if only partly in the AONB, gives a strong message to developers. The Shipham Lane development, however well-screened by trees, would open the door to further developments in the AONB. If protection of the countryside is to be more than an empty phrase then this site should not be allocated.</p> <p>This site, along with Broadleaze Farm, Coombe Farm, Sweetings Yard, and Land North of Greenhill Road, Sandford, will offer 70% market housing mainly to commuters to existing jobs, mainly in Bristol, if current trends continue.. Even in the</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>short term, they all involve a relatively heavy carbon cost, added air pollution, increased journey times on already congested roads, simply because of the fact that like current Winscombe and Sandford residents, the new residents will rely on private car travel to commute to work, take their children to nursery and school, and to access all those services and facilities the two villages do not have. The cumulative effect of traffic from existing developments in Banwell, Winscombe, Sandford, Churchill and Langford is already severe, and the impact on health services and overall cost of air pollution has yet to be quantified. The switch to electric cars, and having an adequate public transport service, is not in sight. These sites involve permanent loss of countryside and damage to wildlife, apart from the loss of good agricultural land, and all are in a sensitive location within sight of the AONB.</p> <p>My overall objection to the allocations of Broadleaze Farm, Coombe Farm, and Shipham Lane is that the allocation criteria are based on the flawed premise that sites can be considered in isolation, without reference to the cumulative effect of development on settlements and parishes, without reference to the overall land supply situation in North Somerset , and without reference to a hierarchy of land for development.. The land North of Greenhill Road, Sandford, site (118 dwellings) was consented on appeal, but the same considerations apply to this site, as follows:</p> <ol style="list-style-type: none"> 1. A plan which allocates disproportionately large sites like Broadleaze Farm, Coombe Farm, and Shipham Lane to countryside abutting smaller settlements is benefiting mainly developers building to satisfy demand for expensive homes in the countryside. It is not serving the basic needs of communities and the public interest as it should be. It is not good planning. 2. The Council knows that if the demand for market housing ,which will respond to wider economic trends, should fall, then these sites may not be developed. Woodborough Farm in Winscombe, at 175 houses, is still not developed after several years. This site allocations plan is not successfully tackling the affordable housing need. Even if the sites are built within a few years, the plan perpetuates an already slanted community mix in Winscombe and Sandford.. 3. This plan as it stands will permit permanent damage to the countryside, without any evidence that this is necessary, or that there is no land in North Somerset of lesser environmental value which could be built on. We cannot afford to be so profligate in planning terms. We know there will have to be many more homes built in future years. An irreplaceable resource like the countryside, particularly the AONB, should be safeguarded for future generations if at all possible. 	

Respondent Name	Comment ID	Comment	Attached documents
		<p>4. Allocating a substantial housing requirement to a countryside area which lacks jobs, the necessary infrastructure, and adequate transport links, without any immediate prospect of making good those deficiencies is not justifiable. The same argument applies to other settlements in the countryside with comparable allocations. There is nothing to show that prioritising the right homes in the right places has any place in this interim plan. There is no evidence of any initiative to find alternative, more suitable sites which don't involve building in the countryside, and are closer to jobs and main transport links.</p> <p>5. . I appreciate this plan is being put forward as an interim measure to meet the housing shortfall, and attempt to get some kind of Local Plan back on track, and that the Council has to work with the realities of local land supply. However, this method of relying on a call for sites, responded to mainly by speculative developers, has failed to meet our local housing need for some time now, and someone should have the courage to draw a line protecting the countryside...</p> <p>An alternative and far more justifiable and sustainable site allocation plan I suggest, would be based on an up-to-date assessment of land availability in North Somerset, prioritising the use of brownfield land and sites near centres of employment and major transport links, and showing a hierarchy of land for development according to its environmental value. I have asked for disclosure of Council-held information about brownfield sites and council-owned land in North Somerset, but unfortunately that information has not been forthcoming as yet.</p>	
Mendip Hills AONB unit	698049//1	<p>North Somerset Site Allocations Plan – Main Modifications Consultation</p> <p>With reference to the above consultation and the Executive Committee decision on 5 September 2017 to include an additional 22 housing sites comprising 821 dwellings within the North Somerset Site Allocation Plan, comments from the Mendip Hills AONB Unit as follows:</p> <p>Included within the additional 22 housing sites are a number of proposed housing sites adjacent to or in close proximity of the nationally protected landscape of the Mendip Hills Area of Outstanding Natural Beauty. Land off Shipham Lane,</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Winscombe as set out on the Site Allocation Plan: Further Assessment of Residential Sites sheet is partly within the Mendip Hills AONB.</p> <p>These sites include:</p> <ul style="list-style-type: none"> • MM22 Land off Shipham Lane, Winscombe (outside settlement boundary and part of site within the Mendip Hills AONB) – proposed units 28. • MM23 Land adjoining Coombe Farm, Winscombe (outside settlement boundary and adjacent to Mendip Hills AONB) – proposed units 24. • MM24 Broadleaze Farm, Winscombe (outside settlement boundary and adjacent to Mendip Hills AONB) – proposed units 80 (74). • MM29 Station Road, Sandford (outside settlement boundary – not related to settlement boundary and adjacent to Mendip Hills AONB) – 16 units. • MM26 Land south of Bristol Road, Churchill (outside settlement boundary) – 41 units. <p>Further, Land north of Greenhill Road, Sandford was granted planning permission at appeal – proposed units 118.</p> <p>Thus, there are proposals for a cumulative total of 307 (301) dwellings on the northern edge of the Mendip Hills AONB.</p> <p>The Countryside and Rights of Way (CRoW) Act 2000 confirmed the significance of AONBs and Section 85 places a statutory duty on all relevant authorities to have regard to the purpose of conserving and enhancing natural beauty when discharging any function in relation to, or affecting land within an Area of Outstanding Natural Beauty. Potential development proposals outside of the boundaries of AONBs that may have an impact within the designated area are also covered by the ‘duty of regard’. The primary purpose of the AONB designation is to conserve and enhance natural beauty. The Mendip Hills AONB Partnership produced the AONB Mendip Hills Management Plan 2014-19 as required by the Act on behalf of the joint local authorities. The Management Plan under paragraph 1.4 sets out a Statement of Significance on the special qualities of the Mendip Hills AONB and these qualities include views in and out of the AONB, settlements of Mendip stone largely confined to the spring line, retaining dark skies and a sense of tranquillity.</p>	


Respondent Name	Comment ID	Comment	Attached documents
		<p>The National Planning Policy Framework (NPPF) under paragraph 115 sets out that ‘great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.’ Further, with regards to Land off Shipham Lane, Winscombe, the NPPF sets out that ‘Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest and meets with other considerations as set out under paragraph 116.’</p> <p>Within the Site Allocations Plan: Further Assessment of Residential Sites assessment sheets, whilst it is identified on a number of sites that ‘Site development may have some adverse impact’ on the Mendip Hills AONB, there is no analysis of the impact of development proposals on the special qualities and landscape characteristics of the nationally protected landscape and regard to the purpose of conserving and enhancing natural beauty. Of particular concern are the suburban densities proposed immediately adjacent to the Mendip Hills AONB which do not reflect surrounding village densities and impact on landscape characteristics of settlement edges. Further, consideration must also be had to the potential cumulative impact of the proposed housing sites on the tranquillity of the Mendip Hills AONB and in particular highways considerations and cumulative impact on the road network system. One of the issues impacting on the Mendip Hills AONB is that routes across the AONB are frequently used as short cuts by through traffic, affecting both tranquillity and the environment of the nationally protected landscape. We further highlight strong concerns regarding the inclusion of MM29 (Land at Station Road, Sandford), a proposal for 16 units of suburban design adjacent to the Mendip Hills AONB outside of the settlement boundary and contrary to the spatial strategy and Policy CS33 of the adopted North Somerset Core Strategy.</p> <p>Should you require further information, please do not hesitate to contact the Mendip Hills AONB Unit.</p>	

Document Section	MM23
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Respondent Name	Comment ID	Comment	Attached documents
G C J Ballard	17751841//2	<p>Ref: NS Site Allocation Plan Coombe Farm/Slough Pit</p> <p>I am writing to ensure you and the Inspector are fully aware of the circumstances in regards to Government rejection of previous application. Also access is now on to Shipham Lane necessitating removal of ancient hedgerow (Vince Russett NSC Officer).</p> <p>An appeal took place on 29th February ref T/APP/D0121/A/99/1032385/P2 Inspector Colin A Thompson.</p> <p>Shipham Lane remains a narrow lane which up to 50 yards from this site is de-restricted (national speed limit 60mph).</p> <p>Any comments that I noted from original notification of 'allocation' that 'there was no previous objection to this site' were in error.</p> <p>Please ensure all concerned are aware of this response.</p> <p>G C J Ballard</p>	
sstockwell	17904513//2	Please see my comment entered in relation to Broadleaze Farm, Winscombe, at MM24.	
Cresten Boase	5118977//2	Please see my comments entered above in respect of Land at Shipham Lane, Winscombe, MM 22	
Mendip Hills AONB unit	698049//2	North Somerset Site Allocations Plan – Main Modifications Consultation	

Respondent Name	Comment ID	Comment	Attached documents
		<p>With reference to the above consultation and the Executive Committee decision on 5 September 2017 to include an additional 22 housing sites comprising 821 dwellings within the North Somerset Site Allocation Plan, comments from the Mendip Hills AONB Unit as follows:</p> <p>Included within the additional 22 housing sites are a number of proposed housing sites adjacent to or in close proximity of the nationally protected landscape of the Mendip Hills Area of Outstanding Natural Beauty. Land off Shipham Lane, Winscombe as set out on the Site Allocation Plan: Further Assessment of Residential Sites sheet is partly within the Mendip Hills AONB.</p> <p>These sites include:</p> <ul style="list-style-type: none"> • MM22 Land off Shipham Lane, Winscombe (outside settlement boundary and part of site within the Mendip Hills AONB) – proposed units 28. • MM23 Land adjoining Coombe Farm, Winscombe (outside settlement boundary and adjacent to Mendip Hills AONB) – proposed units 24. • MM24 Broadleaze Farm, Winscombe (outside settlement boundary and adjacent to Mendip Hills AONB) – proposed units 80 (74). • MM29 Station Road, Sandford (outside settlement boundary – not related to settlement boundary and adjacent to Mendip Hills AONB) – 16 units. • MM26 Land south of Bristol Road, Churchill (outside settlement boundary) – 41 units. <p>Further, Land north of Greenhill Road, Sandford was granted planning permission at appeal – proposed units 118.</p> <p>Thus, there are proposals for a cumulative total of 307 (301) dwellings on the northern edge of the Mendip Hills AONB.</p> <p>The Countryside and Rights of Way (CRoW) Act 2000 confirmed the significance of AONBs and Section 85 places a statutory duty on all relevant authorities to have regard to the purpose of conserving and enhancing natural beauty when discharging any function in relation to, or affecting land within an Area of Outstanding Natural Beauty. Potential development proposals outside of the boundaries of AONBs that may have an impact within the designated area are also</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>covered by the ‘duty of regard’. The primary purpose of the AONB designation is to conserve and enhance natural beauty. The Mendip Hills AONB Partnership produced the AONB Mendip Hills Management Plan 2014-19 as required by the Act on behalf of the joint local authorities. The Management Plan under paragraph 1.4 sets out a Statement of Significance on the special qualities of the Mendip Hills AONB and these qualities include views in and out of the AONB, settlements of Mendip stone largely confined to the spring line, retaining dark skies and a sense of tranquillity.</p> <p>The National Planning Policy Framework (NPPF) under paragraph 115 sets out that ‘great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.’ Further, with regards to Land off Shipham Lane, Winscombe, the NPPF sets out that ‘Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest and meets with other considerations as set out under paragraph 116.’</p> <p>Within the Site Allocations Plan: Further Assessment of Residential Sites assessment sheets, whilst it is identified on a number of sites that ‘Site development may have some adverse impact’ on the Mendip Hills AONB, there is no analysis of the impact of development proposals on the special qualities and landscape characteristics of the nationally protected landscape and regard to the purpose of conserving and enhancing natural beauty. Of particular concern are the suburban densities proposed immediately adjacent to the Mendip Hills AONB which do not reflect surrounding village densities and impact on landscape characteristics of settlement edges. Further, consideration must also be had to the potential cumulative impact of the proposed housing sites on the tranquillity of the Mendip Hills AONB and in particular highways considerations and cumulative impact on the road network system. One of the issues impacting on the Mendip Hills AONB is that routes across the AONB are frequently used as short cuts by through traffic, affecting both tranquillity and the environment of the nationally protected landscape. We further highlight strong concerns regarding the inclusion of MM29 (Land at Station Road, Sandford), a proposal for 16 units of suburban design adjacent to the Mendip Hills AONB outside of the settlement boundary and contrary to the spatial strategy and Policy CS33 of the adopted North Somerset Core Strategy.</p> <p>Should you require further information, please do not hesitate to contact the Mendip Hills AONB Unit.</p>	

Document Section		MM24	
Respondent Name	Comment ID	Comment	Attached documents
Robert Court	17708609//1	<p>INTRODUCTION</p> <p>This note is an objection to the inclusion of the Broadleaze Farm Site on the Publication Version of the Site Allocation Plan put forward by North Somerset Council (NSC). The various points made in this objection also apply to the other sites mentioned in the attached schedule at Appendix 1.</p> <p>The NSC Core Strategy makes repeated references to ‘sustainable development’ and ‘employment-led development. The proposed sites in the new allocation schedule clearly demonstrate that these two policy requirements will not be met.</p> <p>Appendix 1 listing the sites allocated for residential development in the Service and Infill villages within a rough 3 mile radius of Broadleaze Way in Winscombe illustrates the unacceptable scale of the policy being pursued by North Somerset Council. This policy is demonstrably unsustainable in a number of areas.</p> <p>Appendix 1 also shows the impact of the probable increases in population resulting from the development sites proposed in the new site allocations but, in summary:</p> <ul style="list-style-type: none"> • Using an example of 2 adults plus 2.4 children per dwelling, that means a potential increase in the population of • Adults 1724 • Children 8 • Total 8 • and 1724 vehicles <ul style="list-style-type: none"> ◦ there is only one very small new employment site proposed in Wrington ◦ It is not proposed to build any new Primary Schools or Secondary Schools ◦ It is not proposed to build any new Medical facilities 	 Site Consultation Objection.docx (35 KB)

Respondent Name	Comment ID	Comment	Attached documents																		
		<p>◦ there is no new road infrastructure proposed</p> <p>TRANSPORT</p> <p>From North Somerset’s own document “Reviewing the sustainability and settlement hierarchy of settlements in North Somerset” (Revised Report, July 2016) the percentages of residents’ methods of getting to work are as follows:</p> <table border="1"> <thead> <tr> <th></th> <th><u>Driving</u></th> <th><u>Description</u></th> </tr> </thead> <tbody> <tr> <td>Sandford</td> <td>74.1%</td> <td>Relatively High</td> </tr> <tr> <td>Churchill/Langford</td> <td>73.4%</td> <td>Relatively High</td> </tr> <tr> <td>Banwell</td> <td>74.0%</td> <td>Relatively High</td> </tr> <tr> <td>Winscombe</td> <td>70.4%</td> <td>None given, but close to Relatively High</td> </tr> </tbody> </table> <p>As a further example of a village more or less adjoined to Banwell</p> <table border="1"> <tbody> <tr> <td>Locking</td> <td>78.5%</td> <td>Relatively High</td> </tr> </tbody> </table> <p>Attached (at Appendix 2) is a sheet showing the impact of the above percentages in daily use of motor vehicles as a means of travel to work of the first 4 villages combined with the level of proposed developments set out in the site allocations under consultation.</p> <p>It would seem that North Somerset continually ignores Government Planning Practice Guidance Travel plans, transport assessments and statements in decision-taking in its decision making, which stipulates that account must be taken of in-combination transport impacts, giving:</p>		<u>Driving</u>	<u>Description</u>	Sandford	74.1%	Relatively High	Churchill/Langford	73.4%	Relatively High	Banwell	74.0%	Relatively High	Winscombe	70.4%	None given, but close to Relatively High	Locking	78.5%	Relatively High	
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Locking	78.5%	Relatively High																			

Respondent Name	Comment ID	Comment	Attached documents
		<p><i>'appropriate consideration to the cumulative impacts arising from other committed development (i.e. development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next three years) At the decision-taking stage this may require the developer to carry out an assessment of the impact of those adopted Local Plan allocations which have the potential to impact on the same sections of transport network as well as other relevant local sites benefitting from as yet unimplemented planning approval'</i></p> <p>(See http://planningguidance.communities.gov.uk/blog/guidance/travel-plans-transport-assessments-and-statements-in-decision-taking/transport-assessments-and-statements/).</p> <p><i>In other words transport assessments for new developments must NOT be considered in isolation, as has happened with all previous applications in the local area.</i></p> <p>According to the Planning Inspector (David Richards B Soc Sci DipTP MRTPI) who gave the decision not to award Costs to the Appellants (Strongvox 'et al') in their application in relation to Appeal Ref: APP/D0121/W/15/3139633 (decision dated 12 October 2016) -</p> <p><i>“There are fundamental differences between the parties. The Appellants reliance on the concept of ‘opportunity’ highlights their erroneous approach. It requires the application of common sense to understand that people do not use the public transport services available, and that the same pattern of car dependant travel is likely to apply if the appeal is allowed. This is the proper approach.”</i></p> <p>The rating of services as “Amber – “ in the category of being ‘Well Connected’, is frankly ludicrous given the two comments below (again taken from NSC’s sustainability and settlement hierarchy review). In addition, the only direct destinations of the two bus services available (126 and A2) are limited to Weston-super-Mare, Wells and Bristol Airport. There is no direct access to Bristol itself which is by far the main employment area for all the villages mentioned above.</p> <ul style="list-style-type: none"> • <i>“Closest rail station is over 5km.</i> • <i>Bus services limited, especially off peak. “</i> 	

Respondent Name	Comment ID	Comment	Attached documents
		<p>EDUCATION</p> <p>There is a single Primary School in each of Winscombe, Sandford, Churchill and Banwell.</p> <p>All are currently oversubscribed and there is no immediate prospect of expansion to any of them neither is there any land available for expansion at any of the sites without reducing the area available sports activities or recreational time.</p> <p>If the proposed developments proceed, the only possibility of housing the extra pupils would be in temporary classrooms with all their inherent disadvantages, again reducing the area available sports activities or recreational time.</p> <p>The only secondary school in the area into which all four primary schools feed (Churchill Academy) “currently has <u>a little capacity</u>” and is in need of new facilities.</p> <p>MEDICAL FACILITIES</p> <p>There are only two practices operating within the area:</p> <ul style="list-style-type: none"> • Mendip Vale Medical Practice which operates surgeries at Langford, Congresbury, Yatton and St Georges (on the edge of Weston-super-Mare) and • Winscombe and Banwell Family Practice which operates surgeries in those two villages <p>Currently the waiting time for a routine appointment is around 2 weeks at both practices although in theory it is possible to make an appointment to see a non-specific GP on the day. That does however depend on the ability to get through to the reception areas of both practices before all a particular morning’s appointments have been allocated. Not at all easy or usually successful!</p> <p>EMPLOYMENT</p> <p>In answer to the question posed in the NSC document:</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="504 327 1814 391">“Are there a range of local employment opportunities, suitable for those living within the community? Or is the community reliant on one of two big employers?”</p> <p data-bbox="504 430 1339 462">We have the NSC responses which include the ‘traffic light’ coding as:</p> <ul data-bbox="577 499 1915 845" style="list-style-type: none"> <li data-bbox="577 499 1865 563">• Winscombe - Amber Limited employment opportunities: Sidcot School, Primary School, Post Office sorting Office, local Shops <li data-bbox="577 568 1915 671">• Sandford - Amber Thatcher’s and St Monica’s are the only large employers within the village. Also CJL Construction, Lyncombe Lodge Hotel and Mendip outdoor pursuits. <li data-bbox="577 676 1668 740">• Banwell - Amber Plus Various local business. Co-op has just opened, Bristol waterworks, Banwell garden centre <li data-bbox="577 745 1848 845">• Churchill/Langford - Amber A few opportunities available, Mushroom Farm, pub, School etc. Bristol University School of Veterinary Science <p data-bbox="504 885 1550 917">Frankly, these ratings are gratuitously disingenuous and bear little resemblance to reality.</p> <ul data-bbox="577 954 1892 1197" style="list-style-type: none"> <li data-bbox="577 954 1653 986">• All the jobs available are obviously already occupied so only very slow turnover is likely <li data-bbox="577 991 1814 1054">• The variety of experience/qualifications/educational background required to fulfil the relevant jobs are gathered at the top and bottom end of the educational scale. <li data-bbox="577 1059 1892 1123">• Thus, the vast majority of new residents (of which there are potentially nearly 2000) will be forced to look to the two big employment areas (Weston-super-Mare and Bristol) outside the area of the 4 villages in question. <li data-bbox="577 1128 1848 1197">• Thus, increasing the already high incidence of private vehicles on the roads via the four ‘pinch points’ of Banwell, Greenhill Road Sandford, Sandford/Churchill traffic lights and Congresbury traffic lights. <p data-bbox="504 1233 743 1265">VISUAL IMPACT</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<ul style="list-style-type: none"> • The proposed development has unacceptable adverse impact on views from the Mendip Hills ANOB to surrounding countryside. North Somerset sites and Policies Plan Development Management Policy DM11. • The application is in breach of the Core Strategy Policy CS19 –it does not maintain the Strategic Gap between Winscombe and Sandford. • The application is in breach of Core Strategy Policy CS5 – it does not enhance the beauty of the Mendip Hills ANOB. • The application is in breach of Core Strategy Policy CS4 – it does not encourage the retention of trees. • The application is in breach of Core Strategy Policy CS32 – it is outside the village settlement boundary and is for more than 25 dwellings. • The application is in breach of North Somerset Sites and Policies Plan and Development DM10 - the proposed development is harmful to the character of the local area, inappropriate and unsympathetic to the appearance and character of the local environment. • The application is in breach of Core Strategy Policy CS5 – it does not protect and enhance the local environment, wildlife, habitat and trees. • North Somerset Council has a legal duty to preserve the character and appearance of the Mendip Hills ANOB. • The application is in breach of Core Strategy CS5 – the proposed development is out of scale and character. • The application is in breach of Core Strategy CS4 – the applicant has not liaised with Advisory Bodies or Interested Consultees in relation to the landscape. • The Visual Impact Assessment is inadequate as it contains no photographs or simulations of the landscape. This is in breach of North Somerset Sites and Policies Plan Policy DM11. • The application directly contravenes North Somerset Council Sites and Policies Plan • Development Policy DM11 – the proposed development does not provide adequate privacy for occupants of adjacent residential properties, particularly with regard to quiet enjoyment of garden amenities. • The proposed site is within J1 Lox Yeo Rolling Valley Farmland. • The proposed development is in breach of the Human Rights Act Protocol 1, Article 1 – ‘a person has the right to peaceful enjoyment of all their possessions which include home and other land’. • The proposed development is in breach of Article 8 of the Human Rights act – ‘Substantive right to respect for private and family life’. 	

Respondent Name	Comment ID	Comment	Attached documents
		<p>ECOLOGY</p> <ul style="list-style-type: none"> • Adjoins the Mendip Hills Area of Outstanding Natural Beauty (AONB) • Gradual coalescence of Winscombe and Sandford • Strawberry Line extends directly adjacent to western boundary of the Site, only 19% of this 3km section is free from urban development on both sides • More mature trees present prior to the clearance works undertaken by the Applicant along Towerhead Brook Site of Nature Conservation Interest • Applicant’s own comment ‘the proposal for a new residential development is generally considered to be of high significance in terms of visual impact’ • A ‘line in the sand’ must be drawn somewhere to protect the distinctive qualities of the landscape • Applicant’s clearance of habitats just prior to commencing ecological surveys is insupportable • Increasing traffic in the village and surrounding villages (in particular Banwell) • 5m buffer to the AONB and Strawberry Line Local Nature Reserve is a derisory concession from the Applicant • Demolished a barn-like structure potentially used by roosting bats and nesting birds <p>LANDSCAPE AND AMENITIES</p> <ul style="list-style-type: none"> • Significant impacts on the nearby North Somerset and Mendips Bats Special Area of Conservation • The clearance of habitats by the Applicant immediately prior to the commencement of ecological surveys puts the findings of the ecological surveys into serious question impacts on key protected species, most notably bats, Dormice, Badgers and Great Crested Newts, have not been adequately assessed • Adjacent to the Mendip Hills Area of Outstanding Natural Beauty Strawberry Line • Local Nature Reserve and Site of Nature Conservation Interest on the western side • Towerhead Brook Site of Nature Conservation Interest • Design and Access Statement that ‘habitat is considered to be of negligible ecological value providing minimal resources for wildlife’ 	

Respondent Name	Comment ID	Comment	Attached documents
		<ul style="list-style-type: none"> • Possible requirement for HRA in the Applicant’s document and there appears to have been no consultation with Natural England • Applicant’s clearance of habitats just prior to commencing ecological surveys is insupportable - meadows were ploughed in May 2015 • Sutherland Property and Legal Services argued on the Applicant’s behalf (at two parish presentations) that the habitat clearance was just part of routine agricultural management - entirely implausible and must be robustly challenged by North Somerset • Applicant’s ecologists state ‘the site is considered to have limited optimal terrestrial habitat for great crested newts’, this was certainly not the case prior to it ploughing up the old livestock grazed meadows (perfect habitat for foraging newts) immediately preceding the ecological surveys • Ecological impacts on the Strawberry Line is not discussed in any detail in the Applicant’s report <p>I believe that there is absolutely no justification for including the Broadleaze Farm site in the new allocations.</p> <p>Robert Court</p> <p>Please see attachment containing appendices</p>	
sstockwell	17904513//6	<p>I do not agree with site MM24 (Broadleaze Farm, Winscombe) being included in the Sites Allocation Plan, as an isolated proposal nor in combination with sites MM22, MM23, MM26, MM27 and MM29. These proposed sites will not contribute to sustainable development in the area and are not employment led development. Based on an average occupancy of 2 adults and 2.4 children per dwelling, the potential population increase of nearly 3,800 is definitely not</p>	



Respondent Name	Comment ID	Comment	Attached documents
		<p>sustainable in the villages of Winscombe, Sandford, Churchill and Langford. There is only one very small new development site proposed in Wrington, there are no new primary or secondary schools or medical facilities proposed in any of these villages, and there is no new road infrastructure proposed. So many new developments in such a small area cannot be considered sustainable, permission has already been granted for Woodborough Farm and the Land North of Greenhill Road, Sandford, totalling approximately 400 new dwellings. The villages of Winscombe, Sandford, Churchill and Langford cannot be considered 'Well Connected' via public transport and the increase in the number of vehicles on the local roads as a result of these developments will be ludicrous. There is no direct access to Bristol itself via public transport and it is illogical to think that new residents will do anything other than use their cars to get to Bristol, the main employment area for these villages. There is a single primary school in each of Winscombe, Sandford, Churchill and Banwell. All are currently oversubscribed and there are no immediate plans to expand any of them. None of the proposed sites include allocated land for new school facilities, as such an unprofitable option is never considered. The current waiting times at the two local medical practises that service these villages is around 2 weeks. I object to NSC implying that it is acceptable to make this situation worse. When is NSC going to acknowledge that it is inappropriate to decimate our beautiful countryside for the sake of small pockets of totally inappropriate developments. The council should be focussing on forcing developers to build the houses on the land that has already gained planning permission, rather than allowing developers to sit on the land waiting for its value to increase month on month. Greedy developers are dictating planning policy and house building in this county, not the council. The following points relate specifically to site MM24 (Broadleaze Farm, Winscombe) and how the site conflicts with North Somerset Policies and its Core Strategy. The proposed development has an unacceptable adverse impact on views from the Mendip Hills ANOB to the surrounding countryside. Conflicting with North Somerset sites and Policies Plan Development Management Policy DM11. The application is in breach of the Core Strategy Policy CS19 - it does not maintain the Strategic Gap between Winscombe and Sandford. The application is in breach of Core Strategy Policy CS5 - it does not enhance the beauty of the Mendip Hills ANOB. The application is in breach of Core Strategy Policy CS4 - it does not encourage the retention of trees. The application is in breach of Core Strategy Policy CS32 - it is currently outside the village settlement boundary and is for more than 25 dwellings. The application is in breach of North Somerset Sites and Policies Plan and Development DM10 - the proposed development is harmful to the character of the local area, inappropriate and unsympathetic to the appearance and character of the local environment. The application is in breach of Core Strategy Policy CS5 - it does not protect and enhance the local environment, wildlife, habitat and trees. North Somerset Council has a legal duty to preserve the character and appearance of the Mendip Hills ANOB. The application is in breach of</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Core Strategy CS5 - the proposed development is out of scale and character. The application is in breach of Core Strategy CS4 - the applicant has not liaised with Advisory Bodies or Interested Consultees in relation to the landscape. Development Policy DM11 - the proposed development does not provide adequate privacy for occupants of adjacent residential properties, particularly with regards to quiet enjoyment of garden amenities. The proposed site is within J1 Lox Yeo Rolling Valley Farmland. The site adjoins the Mendip Hills Area of Outstanding Natural Beauty (AONB). The proposed development will lead to the gradual coalescence of Winscombe and Sandford. The Strawberry Line extends directly adjacent to western boundary of the Site, where only 19% of this 3km section is free from urban development on both sides (as is the case at Broadleaze Farm). A 'line in the sand' must be drawn somewhere to protect the distinctive qualities of the landscape in Winscombe.</p>	
Cresten Boase	5118977//4	Please see my comment entered in relation to Land at Shipham Lane, Winscombe, at MM22	
Mendip Hills AONB unit	698049//3	<p>North Somerset Site Allocations Plan – Main Modifications Consultation</p> <p>With reference to the above consultation and the Executive Committee decision on 5 September 2017 to include an additional 22 housing sites comprising 821 dwellings within the North Somerset Site Allocation Plan, comments from the Mendip Hills AONB Unit as follows:</p> <p>Included within the additional 22 housing sites are a number of proposed housing sites adjacent to or in close proximity of the nationally protected landscape of the Mendip Hills Area of Outstanding Natural Beauty. Land off Shipham Lane, Winscombe as set out on the Site Allocation Plan: Further Assessment of Residential Sites sheet is partly within the Mendip Hills AONB.</p> <p>These sites include:</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<ul style="list-style-type: none"> • MM22 Land off Shipham Lane, Winscombe (outside settlement boundary and part of site within the Mendip Hills AONB) – proposed units 28. • MM23 Land adjoining Coombe Farm, Winscombe (outside settlement boundary and adjacent to Mendip Hills AONB) – proposed units 24. • MM24 Broadleaze Farm, Winscombe (outside settlement boundary and adjacent to Mendip Hills AONB) – proposed units 80 (74). • MM29 Station Road, Sandford (outside settlement boundary – not related to settlement boundary and adjacent to Mendip Hills AONB) – 16 units. • MM26 Land south of Bristol Road, Churchill (outside settlement boundary) – 41 units. <p>Further, Land north of Greenhill Road, Sandford was granted planning permission at appeal – proposed units 118.</p> <p>Thus, there are proposals for a cumulative total of 307 (301) dwellings on the northern edge of the Mendip Hills AONB.</p> <p>The Countryside and Rights of Way (CRoW) Act 2000 confirmed the significance of AONBs and Section 85 places a statutory duty on all relevant authorities to have regard to the purpose of conserving and enhancing natural beauty when discharging any function in relation to, or affecting land within an Area of Outstanding Natural Beauty. Potential development proposals outside of the boundaries of AONBs that may have an impact within the designated area are also covered by the ‘duty of regard’. The primary purpose of the AONB designation is to conserve and enhance natural beauty. The Mendip Hills AONB Partnership produced the AONB Mendip Hills Management Plan 2014-19 as required by the Act on behalf of the joint local authorities. The Management Plan under paragraph 1.4 sets out a Statement of Significance on the special qualities of the Mendip Hills AONB and these qualities include views in and out of the AONB, settlements of Mendip stone largely confined to the spring line, retaining dark skies and a sense of tranquillity.</p> <p>The National Planning Policy Framework (NPPF) under paragraph 115 sets out that ‘great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.’ Further, with regards to Land off Shipham Lane, Winscombe, the NPPF sets out that ‘Planning permission should be refused for major developments in</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest and meets with other considerations as set out under paragraph 116.’</p> <p>Within the Site Allocations Plan: Further Assessment of Residential Sites assessment sheets, whilst it is identified on a number of sites that ‘Site development may have some adverse impact’ on the Mendip Hills AONB, there is no analysis of the impact of development proposals on the special qualities and landscape characteristics of the nationally protected landscape and regard to the purpose of conserving and enhancing natural beauty. Of particular concern are the suburban densities proposed immediately adjacent to the Mendip Hills AONB which do not reflect surrounding village densities and impact on landscape characteristics of settlement edges. Further, consideration must also be had to the potential cumulative impact of the proposed housing sites on the tranquillity of the Mendip Hills AONB and in particular highways considerations and cumulative impact on the road network system. One of the issues impacting on the Mendip Hills AONB is that routes across the AONB are frequently used as short cuts by through traffic, affecting both tranquillity and the environment of the nationally protected landscape. We further highlight strong concerns regarding the inclusion of MM29 (Land at Station Road, Sandford), a proposal for 16 units of suburban design adjacent to the Mendip Hills AONB outside of the settlement boundary and contrary to the spatial strategy and Policy CS33 of the adopted North Somerset Core Strategy.</p> <p>Should you require further information, please do not hesitate to contact the Mendip Hills AONB Unit.</p>	

Document Section	MM25
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Respondent Name	Comment ID	Comment	Attached documents
Wrington Parish Council	1019201//4	Section 2. Policy SA 1 – Housing Allocations	 Cox's Green 28 houses application - WPC - Annex, April 2017.pdf (429 KB)  Cox's Green 28 houses

Respondent Name	Comment ID	Comment	Attached documents
		<p>Proposed housing allocation, Cox's Green, Wrington, ref MM25</p> <p>This concerns a proposal to erect 28 dwellings on a site at Cox's Green, with a planning application having been submitted and still to be determined, ref 17/P/0485/O. It was subsequently included in a list of sites submitted to the NSC Executive, 5 September 2017. The relevant report stating:</p> <p>The 22 additional housing sites comprising 821 dwellings as set out in Table 1 are recommended to the Site Allocations Plan Inspector for inclusion in the plan to provide additional supply to address concerns about housing delivery identified in her letter of 26 June 2017.</p> <p>and in referring to Cox's Green under item 3.11e it states:</p> <p>This is a site which is subject to two applications; the larger site for 59 dwellings is the subject of an appeal to be held at the end of September. While the larger proposal has significant adverse landscape impacts, the smaller site is of a scale of development which it is considered could be more readily assimilated, subject to resolution of detailed layout, design, and landscape impact. The smaller site for 28 dwellings is recommended for inclusion, but the Council will continue to resist the larger site at appeal due, in particular, to its greater landscape impact.</p> <p>Under Appendix A: 'NSC conclusions on the sites assessed':</p> <p>Site is adjacent to the settlement boundary of Wrington, which is a Service Village. Subject to ensuring safe pedestrian access arrangements (as part of the current application) the site will be served by local facilities and services. The larger scheme previously proposed is subject to significant landscape objections (and is currently at appeal), however the smaller scheme is considered to be capable of assimilation into the village (subject to layout, design and landscape impact). Measures to address any local flood risk impacts will be important in facilitating development of the site. This must be dealt with by conditions attached to any planning consent. The site is within the control of a house builder, who advises that site is deliverable within two years.</p>	<p>application - WPC submission, April 2017.pdf (502 KB)</p>


Respondent Name	Comment ID	Comment	Attached documents
		<p>and under Conclusions:</p> <p>Identify the site within Schedule 1 of the plan for 28 dwellings, with reference to requirement for measures to address any impact on local flooding issues.</p> <p>Commenting in brief on the points made above. It seems to us that the landscape impacts resulting from the 28 house development would be little different to those created by the larger 59 house proposal. This is an undeveloped rural green field site, adjacent to the Green Belt boundary and with a Wildlife Site close to the south. Development on the site, whether one, 10, 28 or 59 houses, would be visible from both Wrington Hill and the Mendip Hills AONB and would certainly have significant negative landscape impacts, not least from the effects of lighting.</p> <p>On the point made about being served by local facilities and services, should the site be developed then any new residents would probably do much the same as many of our existing residents, which is to use the more comprehensive facilities and services elsewhere. This would of course create more traffic movements. However, and perhaps more significantly, the regular flooding experienced around this site cannot be mitigated through planning conditions, as was obvious from the recent planning Inquiry on the 59 houses proposal. See appeal ref APP/D0121/W/16/3166147.</p> <p>Under MM25 and ‘Site specific details/notes’, NSC states:</p> <ul style="list-style-type: none"> - New allocation. - Vehicular access off Havyatt Road. - Design/layout to minimise visual impact of the scheme. - Retention of existing hedgerows. - Improved footpath access to village. - Open space requirements to be fixed through planning application. - Sufficient space to be allowed for effective access for maintenance of watercourses and surface water drainage features. 	

Respondent Name	Comment ID	Comment	Attached documents
		<p>While we comment further below, it should be noted that there is no ‘footpath access to the village’, although a new footway has been proposed by the developer. However, this is not achievable as to build on the existing highway surface would result in an unacceptable reduction in road surface width, and the owners of the relevant neighbouring residential properties have stated in writing that they will not sell any land to allow the footway to be built. It is concerning that there is no reference by NSC to the potential ecological impacts.</p> <p>Planning application 17/P/0485/O</p> <p>Your attention is drawn to the various representations submitted on the relevant planning application. These should be read alongside the comments on application 16/P/1291/O for 59 houses and the subsequent appeal. The issues are much the same and include landscape impact, flood risk, flooding of the access roads, poor pedestrian access on narrow roads which carry regular HGV traffic, limited public transport services, ecological/wildlife impacts and, of course, sustainability. Most new residents would choose to drive rather than walk or cycle, in which case they would be more likely to use larger shops and other facilities elsewhere. Also, it can now be difficult to park in the village centre following conversion of various shops and other commercial premises to residential use.</p> <p>We have enclosed the Council’s comment on application 17/P/0485/O, together with the original comment on 16/P/1291/O, but with the latter as submitted as an Annex to the later 28 houses application. These previous comments should be read as key elements in this submission to the Inspector, which means that we can reduce the length of this comment.</p> <p>However, we do need to make some additional points, these concerning the NPPF and, particularly, flood risk.</p> <p>National Planning Policy Framework (NPPF)</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>The NPPF has sustainable development as its core aim, yet the Cox's Green site cannot offer sustainability on any level. We won't expand too much on this here but please refer to our comments on the relevant planning applications. These are enclosed with this submission.</p> <p>The NPPF promotes sustainable transport choices under para 29, recognising that <i>'transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives'</i> and stating that <i>'the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel'</i>. However, there would really be no choice on travel modes resulting from development at Cox's Green, with residents having no practical alternative to using their cars for access to supermarkets, retail outlets, medical services, employment, railway stations, etc.</p> <p>We suspect that any significant development in or around Wroughton would result in increased congestion, particularly in the village centre, in conflict with para 30.</p> <p>We suggest that the development proposal fails to meet the requirements of para 32 in relation to <i>'safe and suitable access to the site for all people'</i>. Cox's Green is a narrow country lane. It is currently between 5.3 and 6m wide and could not be narrowed further without breaching accepted highway safety standards, particularly in relation to HGV and bus traffic, ref Manual for Streets, and NSC and bus operator design guides. In the circumstances, it is hard to understand why NSC Highways did not object on these grounds.</p> <p>Under para 35, the NPPF states that <i>'developments should be located and designed where practical to:</i></p> <ul style="list-style-type: none"> - give priority to pedestrian and cycle movements, and have access to high quality public transport facilities; 	

Respondent Name	Comment ID	Comment	Attached documents
		<p>- create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;</p> <p>However, the Cox's Green site is located more than 800m from the village centre which is the recommended IHT maximum. The route to and from the village has obvious conflicts between vehicle traffic (including HGVs) and pedestrians, and could not be considered 'safe and secure'. Also, there is certainly no 'high quality public transport service', nor is this likely to be provided in what is a rural area where more frequent high quality bus services would inevitably be uneconomic.</p> <p>The local authority is not in any position to improve car parking in the village, ref para 40. There is no more space available, either for creating parking spaces on the highway or for off road parking.</p> <p>The NPPF clearly requires that sites proposed for development are 'deliverable', para 47. This is not the case with Cox's Green as the proposed pedestrian access would need a new footway to be constructed and this is not feasible without the co-operation of residents, as suggested earlier.</p> <p>Under para 55 the NPPF states '<i>To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities</i>'. We agree, although anything other than small scale, or very minor new development should only be located where there are adequate services and facilities available. As a minimum this should include a school (para 72), medical facilities, at least a small supermarket and a post office. Please note that the Mendip Vale Medical Practice has given notice that the small branch surgery in Wrington is to close, although MVMP has allegedly deterred residents from using it in recent years. Also, and significantly, there is no ATM in the parish other than at the airport.</p> <p>The NPPF comments at length on protecting the Green Belt, paras 79 - 92. While the Cox's Green site is not within the Green Belt, it is adjacent to it, as it is adjacent to the settlement boundary. As such it can be argued that the proposed development would impact on the openness of the Green Belt.</p>	

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		<p>Finally, we have noted the recommendation under para 100 that <i>'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk'</i>, and also the points made under paras 101 - 103. It is a fact that the roads surrounding the site proposed for development all flood. This is fluvial in the case of Mill Lane and Havyatt Road, and pluvial in Nates Lane and Cox's Green itself.</p> <p>Surprisingly, in an email sent 22 September 2017, an NSC Flood Risk Officer stated that they <i>'have no local records of flooding in Nates Lane'</i>. But, the road here floods regularly, with other NSC Officers being well aware, and of the risk to drivers on the A38 main road when they immediately stop on turning in to see the deep water. In the same email it is stated that <i>'Priority is given to highway flooding/drainage problems that pose a significant risk to road users, or cause flooding of dwellings'</i></p> <p>and that <i>'we have no records of road flooding on Cox's Green'</i>, although photographic evidence has been provided to NSC showing the road completely flooded and it is well known that at least one house here has flooded in the past. It is also stated that the location <i>'hasn't been flagged up as a problem'</i>, which isn't correct, and that NSC does not <i>'have details of all our drainage systems'</i>.</p> <p>The latter point is deeply concerning as it means there can be no guarantee that any related planning conditions could be met, although this lack of understanding is perhaps why NSC didn't object on flood risk grounds. The road surface in Cox's Green floods because the drainage is inadequate and the development site could not drain fully to the south because of the topography. Development would be certain to increase surface water flows to the north where there is no dedicated surface water drainage system, just a small capacity road drain. A further issue is that if the development was to proceed and the footway constructed, it would be unusable in flood conditions as the water depth would exceed any normal kerbing level. The developer's drainage consultant appeared to have little understanding of these practical Cox's Green issues when he presented evidence at the recent appeal hearing, having stated that he hadn't visited the site, nor has the developer asked for the Council's experienced views on these and related issues.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>We suggest that built development on this site would not meet the requirements of paras 100 - 103. We wanted to highlight this and the other NPPF issues to make the point that including the Cox's Green site would be mistaken.</p> <p>PLEASE SEE ATTACHED COMMENTS ON PLANNING APPLICATIONS 16/P/1291/O and 17/P/0485/O</p>	
ajh	11806881//1	See attached file for comments regarding MM25 and MM62	 20171030 - SAP Submission.pdf (106 KB)
e Gibbs	14819425//1	<p>I am writing to formally object to the notion that the land to the south of Cox's green (Wrington) be considered for consideration of further sites in the allocation. I object to the following assessment criteria NSC have scored the site:</p> <p>Primary school access /ability to expand is rated GREEN by NSC yet the school is full, has been for many years, local village children are often not able to get into the school and have to be bused to neighbouring schools. I am interested to see what NSC feel the expansion provision would be for Wrington school given that the school currently operates out of porta-cabins due to lack of funding for a new school to be built on site. The chances of the children from this land site being awarded places at Wrington school re very low. I feel the core should therefore be amber if not red.</p> <p>Employment opportunities rated as Green by NSC. Whilst there is low paid labour jobs (bar staff, cleaning jobs etc) there are no local employment opportunities that would bring an income in that would sustain a mortgage for the type of houses proposed to be developed on this land. In reality residents would need to travel by car to find employment that paid enough for their cost of living in said houses to be met.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Sub- objective 2.5 scored green- this site lies outside of the settlement boundary a distance from the village that many would find difficult to manage on foot.</p> <p>Sub-objective 4.3 scored by NSC as amber. This site is clearly visible from many points on the mendips (an AOAB) which if developed would create a significant impact on the vista and impact on the local environment. I feel this should be scored red especially in view of the fact that opening this area of land to development will leave NSC wide open to further developments that will contribute to a permanently altered landscape vista from the mendips.</p> <p>Sub-objedctive 4.6- it is preposterous that NSC rate this site as green as despite technically being outside of flood zone 3, this area of Wrington is known by NSC and the emergency services to be a site that regularly (i.e. at least once a year) floods to a degree that means residents are cut off by road. Emergency service vehicles are unable to access the site and people’s homes are damaged. Building on this site will mean residents are cut off by road for periods of the year where even emergency vehicles could not get to them. NSC then rates sub-objective 4.7 as RED...thus highlighting my point regarding 4.6.</p> <p>Sub objection 5.2 again whilst on paper this point could score green as there is a bus stop within 400m, the buses do not run at a frequency or time of day to enable anyone to use said “ sustainable transport” for commuting purposes or to access further transport links. The buses don’t run on a Sunday, run hourly but only from 8am and finish early in the evening. It is irresponsible to suggest that this heavily subsidised sparse bus service represents “ sustainable transport” . The site would therefore be inhabited by residents needing to use a car and thus adding to highway use. Sub objection 5.4 as scored RED by NSC highlights this point.</p> <p>I would very much like NSC to argue that whilst the site has to be included in the site allocation considerations (due to potential proposed developers wanting the land) it is a highly unsuitable site that should be dismissed for the reasons stated above.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="506 325 734 352">With warm regards</p> <p data-bbox="506 395 797 422">Lizzie and Adrian Gibbs</p>	
e Gibbs	14819425//2	<p data-bbox="506 515 831 542">MM25 Land at Cox's green</p> <p data-bbox="506 585 1525 612">I object to this site being included in the site allocations plan for the following reasons:</p> <p data-bbox="506 655 1666 751">Sustainability – this is an unsustainable site, it lies outside the village boundary, a sizeable distance from the village centre, potential residents would be extremely unlikely to walk to and from the village if they have small children, are elderly or infirm.</p> <p data-bbox="506 759 1697 855">Lack of public transport- there is an extremely limited bus service that only operates at limited times of the day and not on Sundays. Using public transport for commuting or reliable transport purposes is not an option.</p> <p data-bbox="506 863 1688 927">Flooding to access roads of the site- this site regularly floods, the roads flood at least once a year to a point where no vehicle can access the site.</p> <p data-bbox="506 935 1704 1031">Safety issues, if a pavement were to be put in place to serve the site- at the inquiry regarding a proposed development on this site it was demonstrated that there is NOT a wide enough width of road to safely accommodate a pedestrian pavement as well as accommodating two lanes of traffic.</p> <p data-bbox="506 1038 1697 1214">HGVs 's having issues accessing Burnett's Industrial Estate- HGVs already have great difficulty accessing the site without needing to take the turn in more than one manoeuvre, the proposed pavement lies in the direct path of HGVs trying to turn into the site, meaning they would need to mount the pavement to make the move. This would compromise both the pedestrians safety as well as ease of use of the industrial estate and could compromise this site for business use.</p> <p data-bbox="506 1222 1688 1350">Lack of services within the village- although Wrington is technically classified as a service village, the NSC itself recognises that the services within the village are severely limited and decreasing. We have no GP surgery, a post office that closed and a smaller one accommodated within the village shop.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Lack of parking in the village- the village already suffers with capacity issues related to available parking spaces within the village, this means some residents are put off from using the village shop as there is nowhere to park, they then use their car to access facilities in neighbouring villages. Residents at this proposed site would undoubtedly drive to access the village, and if unable to park would invariably chose to shop elsewhere.</p> <p>Limited school places- the school lies in the centre of the village, has been and remains at almost full capacity. Residents to this proposed site would be the furthest from the school geographically and would be unlikely to gain places in the school, they would therefore need to be bused to schools in surrounding villages.</p> <p>This site has previously been rejected for inclusion in the site allocation plans by NSC for good reason (many of which are illustrated here).</p> <p>I have previously objected to this site even being considered within the site allocation. Again I ask for consideration of these facts to ensure this site does not get included in the site allocation plan.</p>	
M Fry	14819777//1	<p>I am writing to strongly object to the land at Cox's Green, Wrigton to be added to the Site Allocations Plan. There is no foot path to the facilities in the village, as required by council policy and the plans which have been put forward by the developer have been proven to be unsafe because the road isn't wide enough to allow traffic to pass - plus it's on a blind bend, so narrowing the road is dangerous. Also, the person who would have to sell part of their garden to allow for a footpath (in addition to narrowing the road), has stated officially that he is unwilling to do so. This footpath and therefore the development is undeliverable.</p> <p>In addition, Wrigton has no banks, the satellite doctor's surgery (the main one having closed) is due for closure, the school is at capacity or over subscribed, the lanes along Havyatt Road and Cox's Green regularly flood cutting off the residents of the new houses, it's too far for anyone other than an average healthy young person to walk to the village so people will drive everywhere - i live there, i have small children, I drive everywhere. There are no bus services to the railway stations at backwell and yatton, the bus to the airport is only every hour and the connecting bus to bristol doesn't get you in in time to get to work at 9am. The last bus home from the airport is at 7pm - too early!</p>	

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		<p>The road system through Wrington regularly gets gridlocked if anything more than a school coach and 2 cars try to move through the village at the same time.</p> <p>All of these points have been formally submitted with the relevant evidence relating to specific council policy.</p> <p>Development here is unsafe, undeliverable and unsustainable and should NOT be included on any site allocation plan no matter how much pressure the council is under to meet targets.</p>	
Sally Bartlett	14822593//2	<p>I would like to add my agreement to the comments and opinions stated by the Wrington Village Alliance. Given the evidence that was submitted to the recent inquiry (APP/DO121/W/16/3166147) for planning application for 59 Houses on this site, it would be extremely short sighted of North Somerset Council to include this site for residential development. The evidence submitted to the inquiry by the WVA and residents at the public session proved that the Flood Risk Team, Highways and NSC planning have severely underestimated the effect of serious flooding and safety issues concerned with this site. It should be apparent to NSC that until the flooding issues in this area of Wrington are professionally and seriously investigated, the residents and businesses will be at risk of severe disruption and if building is allowed on this site, more homes will be flooded. The homes to be built will be at risk, the attenuation planned is the the result of computer modelling that by the developers own expert's admission does not take into account the effect on flooding caused by the natural and unmapped springs on the land.</p> <p>The footpath intended by the developers is undeliverable, this has been proved by the WVA and several experts.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>The land is BMV agricultural, outside the village boundary and is valuable countryside, a stepping Stone for wildlife and building on this land contravenes North Somerset's own Core Strategy. North Somerset may be a PUD (Persistent under delivery on the 5year housing supply) but for robust planning reasons. I urge the Council to stand firm in the face of extreme and unfair pressure from Central Government, to listen to the sensible advice from organisations such as CPRE and refuse to give permissions on sites ,that are just plain unsuitable for development.</p> <p>I would also urge the Council to listen and action the views of local residents, not just in Wrington, North Somerset cannot sustain the level of development planned, the infrastructure is just not there! Please do not let this consultation be just a paper exercise, this site should not be developed.</p>	
Katrina Russell	14828033//1	<p>-</p> <p>I originally submitted these comments below to NSC for the consultation regarding the Further Assessment of Residential Sites that went to the Executive Committee on the 5th September. The closing date for comments was 21st August and the report sent to the Committee must have been compiled within an extremely short period of time to allow Executive members to have and read the report before the 5th September. Therefore I do not believe that there would have been sufficient time to review the comments made in detail. It appears that the decision to include all the sites under review may have been made regardless of the comments submitted.</p> <p>I raised concerns about the Site Assessment for the Land at Cox's Green. Within the Executive report, against my comments NSC responded, "Site assessment is considered to be appropriate". Living within Wrington and using my local knowledge, my comments included that some of the answers/ scores given were wrong. How can this be ignored and the site assessment be considered to be appropriate when the scores are wrong? On reading Wrington Parish Council's response, I can see that they have highlighted additional errors in the scores for the site assessment. If the site assessment is wrong, this surely needs to be amended with the correct scores given and then reviewed</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>appropriately. NSC must accept that local residents and the Parish Council will have better knowledge regarding local matters.</p> <ul style="list-style-type: none"> • Site details <p>The Site Notes state that “The proposal is reduced from 59 units”. This is misleading as the application for 59 houses, which is awaiting decision by the Planning Inspectorate following an Appeal Inquiry in September, is for a much larger site, 3.68ha. The application site for the 28 houses is much smaller, 2.23ha. However, both applications require attenuation ponds; the area of which is the same in both applications, so the density of housing remains more or less the same even though the number of houses have been reduced.</p> <p>Within their Executive report, against my comments, NSC responded that there this a difference between the two proposals, in particular in terms of landscape. I do not believe this to be true. The density of housing alongside the roads is the same and what will be seen by people entering and leaving the village, via Havyatt Road or Nates Lane either by car or on foot, and seen by the surrounding residents will be the same.</p> <ul style="list-style-type: none"> • Flood Risk Status <p>All the roads surrounding the site (Havyatt Road, Cox’s Green, Nates Lane and Mill Lane) are subject to surface water flooding and impassable to cars. At times the site is essentially an island.</p> <p>In the most recent flooding in Wrington, on 21st November 2016, I had to abandon my car in the village as I could not reach my house via Havyatt Road, Nates Lane or Cox’s Green. I had to phone a friend to come and help me carry my 3 children through the flood waters so we could get home. Please see attached photo, Cox’s Green 211116. As an able-bodied adult, this situation would not have caused me too much anxiety but accompanied by my 3 young children, this was very frightening and stressful. Any residents on the proposed site would have been faced with exactly the same</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>situation as me that day. They would not have been able to access their houses. For anyone with children, the elderly or less able bodied, this would have been extremely frightening and stressful, as it was for me.</p> <p>Surface water flooding is a real problem and a real worry to local residents. There are a number of local residents who have had their cars written off driving through these flooded roads. Developing this site has the potential to worsen the existing problem in this area, with Havyatt/ Cox's Green Road being one of main access routes in/out of the village. Additional water entering the Yeo here will also increase the risk of flooding further downstream at Butts Batch, the other access road in/out of the village on this side.</p> <ul style="list-style-type: none"> • Landscape <p>The site is outside/ adjacent to the settlement boundary. Lumping a housing development here, on the edge of the village will totally ruin the rural setting of Wrington. The edge of the village here is as you would expect the edge of a village to be – less dense housing found along the edge of the roads with housing become denser as the roads lead you further into the village. Building houses here will be completely out of keeping with the existing character, which should be protected.</p> <ul style="list-style-type: none"> • Ecology/ Environment <p>The Ecology Report submitted by the developer showed a high level of bat activity along the hedgerows in the site. This assessment was also carried out between March and October 2015, which is considered to be out of date.</p> <ul style="list-style-type: none"> • Transport and Highways <p>There is no safe pedestrian access to the village from the site and neither of the current applications for the 28 or 59 houses have produced a viable solution to providing the necessary footway along</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Cox's Green into the village. Although NSC's Highways Department have not refused the most recent proposal for the installation of a footway along Cox's Green outside the Burnett's Industrial Estate, the Wrington Village Alliance Transport and Highways expert has produced a report highlighting health and safety issues along this stretch that have not been considered by NSC's Highways Team, regarding the turning circle for lorries entering/ exiting the Burnett's Industrial Estate, with HGV's needing to mount the proposed pavement. Also, the proposed footway would need to pass through residents' front gardens. Those residents would not be willing to release any of their land to the developers, so the proposed footway would not be able to be installed.</p> <p>All roads surrounding the site are narrow country lanes. They are already used by a lot of lorries, tractors and other farm vehicles. All it takes is for a tractor to meet a lorry/ bus, cars quickly back up behind both and chaos arises! Havyatt Road/ Cox's Green are also used as a "rat run" for vehicles wishing to travel from the A38 to the A370. In the winter months vehicles on Havyatt Road often need to drive on the wrong side of the road to avoid surface water which collects and remains on the roads for weeks at a time.</p> <ul style="list-style-type: none"> • Agriculture Land Value <p>The land has been described as probable Medium BMV land. These fields are currently used by a local Wrington farmer for grazing. Surely the fact that they are currently being used for farming shows that they have an agricultural land value? These are not empty fields not in use. There has also not been an actual soil survey carried out, only computer based modelling and the only way to establish the actual grade is to carry out a soil survey.</p> <ul style="list-style-type: none"> • Combat ability with surrounding uses <p>A "Yes" has been given. However, the proposal site is outside the settlement boundary and is opposite the Havyatt Business Park, which includes the Butcombe Brewery, Travis Perkins and PJ Hare. The access road to the site is very close to the access road into the Business Park, which is used</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>by lots of HGVs. Lorries often park on Havyatt Road along this stretch of road if they need to wait to enter the Business Park. Industry is typically found on the outskirts of villages so that the business of businesses does not interfere with residents. Problems arise when residential properties begin to encroach on business areas. Havyatt Business Park is a safeguarded employment site and it is NSC's duty to protect this. The Butcombe Brewery and PJ Hare have both submitted objections to the planning applications for this site, voicing their concerns over the negative impact building housing this close to the business park will have on their businesses.</p> <ul style="list-style-type: none"> • Physical factors <p>The site is susceptible to surface water flooding. Water collects in various areas of the site, in the centre of the site and along its edges with Cox's Green and Havyatt Road.</p> <ul style="list-style-type: none"> • Site Availability – Are there any known legal/ ownership constraints? <p>The current application proposals for the necessary footway into the village along Cox's Green requires land from a number of residents' private gardens to be taken. These residents are not willing to release their land for this purpose.</p> <p>Suitability Assessment</p> <p>2.2 Achieve reasonable access to a full range of educational facilities - Primary Education</p> <p>A Green has been awarded, stating that Wrington School has capacity.</p> <p>However, it is generally accepted that schools should not operate at full capacity and it is NSC's policy to aim to have surplus places in the region of 5-7%. Wrington School has a total capacity of</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>210 children. Therefore, Wrington School should have surplus spare places of 10 – 15 children per year. Therefore the spaces available should not necessarily be filled.</p> <p>Also, a developer cannot assume that spare places can be filled by children coming from a new development. Wrington is an attractive village for families or couples wishing to “settle down” and start a family. There are always new families moving into the village, who will also have a demand on the spare school places.</p> <p>The Council's pupil projections are recalculated annually. The projected figures for reception intake have been shown to increase and become more accurate closer to that actual year, as more families move into the village. For example, in the 2014 Pupil Projections it was predicted that Wrington reception class would have an intake of 24 in 2016. The 2015 Pupil Projections predicted 28. Actual intake for 2016 was 30. Therefore the figure for predicted spaces available in future years is already inaccurate and more than what it actually will be. This is reflected in the Council’s most recent Pupil Projections 2016 – 2020 which predicted 9 spaces in 2016, 11 in 2017, 19 in 2018 and 29 in 2019. However, these figures themselves are now already out of date, as in the April this year there was only 8 spare places in the school (data provided by the school on 02.04.2017).</p> <p>We are aware of 2 families that have recently moved into Wrington over the last few months and their children have not been able to gain places at the School. One family’s children are going to be at Churchill School and the other family’s children will be at Burrington. This does not help new families moving into the village integrate with the rest of village or allow them gain a feeling of being part of the community.</p> <p>It is NSC's policy that “school places can only be deemed to be 'available' to development residents if accessible via a safe route to school.” At present there is not a safe route to school from the site. Even if it was possible to install a footway along Cox’s Green, the footway disappears again further into the village and to obtain a safe walk to school children would need to walk via Rickyard Road, a walk in</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>the region of 1300m. This is much greater than both NSC's Desirable walking distance to school of 500m and their Acceptable walking distance to school of 1000m.</p> <p>This section should be changed to an Amber.</p> <p>2.4 Provide opportunities for people to work locally</p> <p>A Green has been awarded, however to say that there is good access to a wide range of local job opportunities within Wrington is simply not true.</p> <p>Few job opportunities arise locally and those which do come up are generally low paid. As stated in NSC <i>Assessing Sustainability and Settlement Hierarchy in rural Settlements</i>, business start-ups are recorded as 24, which is one of the lowest recorded across the district. The 2 industrial estates have various small businesses but limited job opportunities arise. Businesses that provided employment are moving out of the village or closing down, e.g. the Doctor's surgery moved to Churchill, the bank closed, the post office closed and relocated to Amor's store with reduced staffing. The bank is still empty, the post office is being sold as a residential property, the Doctor's surgery site is now 4 houses. To imply that people moving to a new housing development in the village are going to be able to access jobs in the village is unrealistic.</p> <p>This needs to be changed to Amber or even a Red.</p> <p>2.5 Achieve reasonable access to town centre services and facilities</p>	



Respondent Name	Comment ID	Comment	Attached documents
		<p>A Green has been awarded, however Wrington’s status as a Service Village is questionable. It may have had service village status when this was originally determined (Settlement Function and Hierarchy 2007) but the loss of facilities and sustainable transport since, suggests that Wrington now meets the criteria of an Infill Village.</p> <p>A Service village is supposed “to provide a service role function beyond their immediate locality and normally serve the population of one to three parishes.” However, the population of Wrington need to use the services of other Service Villages. Residents of Wrington need to use the Doctor’s Surgery in Churchill (although often to get an appointment we are often now sent to Yatton Surgery). We need to shop in Budgen’s in Churchill, Tesco Express in Congresbury or Co-op in Yatton. To use a bank we need to go to Yatton. To use a cash machine we need to go to Budgen’s in Churchill or Tesco Express in Congresbury.</p> <p>If we are a Service Village, why do we always have to travel to and use the facilities and services of other villages? To award Wrington a Green, implies that we have the same services and facilities as other villages such as Congresbury, Yatton, Long Ashton, etc and the same as if we were on the edge of one of the towns! This is simply not a true reflection of what Wrington is really like or the services it has to offer its residents.</p> <p>This should be an Amber.</p> <p>4.2 To protect and where possible enhance biodiversity and geodiversity at a landscape scale, particularly with respect to protected habitats and species</p> <p>Amber has been awarded, however the Ecology report submitted by the developer for the recent applications has highlighted a high level of bat activity along the hedges of the site. We are concerned about the impacts of lighting on the bats. This is an intrinsically dark sky that should be protected.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Although the current applications propose low levels of lighting in their own lighting schemes (which may in themselves still be too high) the lighting that will emanate from the houses themselves cannot be controlled.</p> <p>This should be a red.</p> <p>4.3 Minimise impact on and where appropriate enhance valued landscapes, recognising its wider purposes (natural beauty, enjoyment and cultural heritage) whilst having regard for its economic and social well-being. Including that within or close to the Mendip Hills AONB.</p> <p>An Amber has been awarded, however the Planning and Regulatory Committee refused the application for 59 houses on the basis that the development failed to respect the character of the settlement, would be out of keeping with the rural landscape character and quality of the area and would result in harm to the rural setting and edge of the village here and was therefore contrary to DM10, DM32, CS5, CS12, CS14 and CS32.</p> <p>Although the number of houses has been reduced to 28, the area in which the houses are to be built has also been significantly reduced, so the density of housing remains the same. This type of development is not suitable for the rural setting of the edge of the village. It is out of context of the existing housing here and will cause an unacceptable harm to the character of the area, which is a picturesque rural village.</p> <p>This should be a red.</p> <p>5.1 Achieve reasonable access to sustainable transportation - frequency of bus services</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>A Green has been awarded, which gives the impression that Wrington has an acceptable and appropriate level of bus services. However this is not the case.</p> <p>Section 5.1 refers to Policy DM27 of Sites and Policies Development Management policies. Policy DM27 aims to ensure that “all new development is accessible by bus services and that services are provided at an appropriate level.”</p> <p>Wrington is served by one bus route only, the A2 which goes from Weston to Bristol Airport via Banwell, Winscombe, Sandford, Churchill and Wrington. These buses are available approximately hourly during the day, however only to those destinations mentioned above. Surely to achieve a reasonable access to sustainable transportation, it is not just the frequency of bus services that should be taken into account – the destinations are also surely important!</p> <p>Weston is the only main town that can be accessed via public transport from Wrington. Residents would not be able to get to the other towns of Nailsea, Clevedon or Portishead, or the train station at Yatton, or the majority of the other service villages. I work in Yatton and my husband works in Clevedon and neither of us can use public transport to get to work.</p> <p>To get to Bristol, residents would be able to change at Bristol Airport and get the Bristol Flyer. However the earliest A2 bus leaving the village arrives at the airport at 8.12am. There is then the walk to the Flyer bus stop, wait for the next bus and journey into Bristol, which is at least 30 minutes at quiet times, much longer at rush hour. So it would be not possible to get to work in Bristol for 9am. The journey is also expensive. Even with the Flyer residents discount card, a return journey from Wrington to Bristol would cost £11.50 and then there maybe be an additional bus journey depending on the place of work in Bristol itself.</p> <p>Therefore, it is not considered that Wrington should receive a Green, based on the fact that there is not an appropriate level of bus services from Wrington, due to the limited destinations that can actually be reached by bus.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>This should be an amber or red.</p> <p>5.2 Achieve reasonable access to sustainable transportation –</p> <p>Proximity to bus stops</p> <p>A green has been awarded, however the nearest bus stops would only be 400m from the northern end of the site.</p> <p>Also, DM27 states that, “The nearest appropriate bus stops should be compliant with the necessary disability legislation with raised kerbs.” The nearest bus stops on Silver Street are not disability compliant. The bus stop leading into the village is on a normal unraised pavement, which is particularly narrow. The bus stop leaving the village has no pavement at all and is on rough ground by the Recreation Ground. The closest bus stops to the site that are disability compliant are outside the Golden Lion, which is approximately 800m from the site. This distance would score a Red.</p> <p>Neither of the bus stops closest to the site have a shelter, as recommended. Also, DM27 states that pedestrian access to the bus stops should be a well-lit, safe route with clear sight lines. The pedestrian access to the bus stops on Silver Street are poorly lit and on a road, on a sharp, blind bend which does not have a foot way. As mentioned previously, installing a pavement here has not been shown to be possible.</p> <p>Therefore, this section needs to be amended to a Red.</p> <p>5.3 Achieve reasonable access to sustainable transportation - Pedestrian and cycleway links</p>	



Respondent Name	Comment ID	Comment	Attached documents
		<p>Amber has been awarded, however it is not considered that there is “safe and convenient connection to the surrounding area”. There are no footways on any of the roads surrounding the site or into the village. The roads are narrow and have a lot of HGVs, tractors and other farm vehicles using them. They roads are subject to surface water flooding and they are poorly lit. People walking on the roads wear hi-visibility vests even in the day and at night you need a torch to walk into the village. There are no cycleways nearby and cycling is not considered safe on these roads.</p> <p>The site should receive a Red score for this section. It has poor links to the surrounding area as it has no pavement or cycleway.</p> <p>The walk into the village is unsafe at a number of places where the footway disappears after Rickyard Road and then again on Silver Street into the village. There is a need to cross the road on Silver Street outside the Recreation Ground entrance where the pavement ends on one side of the road and starts on the other side. Crossing here is on a bend of the road, which is dangerous with children and pushchairs. More often than not I start crossing but then have to stop and back my pushchair and children onto the pavement again as a car comes round the corner. The facilities in the village itself are on roads without pavements, on a bend, with lots of parked cars at a busy road junction. The walk into the village really is treacherous in a number of locations, especially with children.</p> <p>This should be a red.</p>	
AG	14836193//1	<p>I would like to add my own strong objections to the others I see already submitted here. It is hard to imagine a more inappropriate location for development at Wrington. The serious access issues in Nates Lane, Coxs Green and Havyatt Road (narrow roads, blind corners and lack of pavements on all surrounding roads – which will not be solved by the proposals) mean that placing a new development here will put all new residents in danger when walking the roads, and existing residents (my own family included) in increased danger from the increased traffic. There are many other reasons against this development which have already been raised to the council (to name but a few – lack of</p>	


Respondent Name	Comment ID	Comment	Attached documents
		supporting infrastructure within the village, frequent flooding events in the surrounding roads which damages homes and destroys cars, Wrington's infrequent public transport connections, inappropriate scale and character of development etc.). I am aware that North Somerset is under pressure to deliver new housing, but that should not be a reason to give a green light to a site in the wrong location which is simply not fit for development.	
Wrington Village Alliance	14836321//1	attached pdf: Objection from the Wrington Village Alliance, in addition to other objections.	 SAP-Consultation.WVA.Summary.pdf (110 KB)
Wrington Village Alliance	14836321//2	Please see the attached document for the Wrington Village Alliance's comments regarding MM25, Land at Cox's Green.	 WVA SAP MM25 301017.pdf (196 KB)
DP	17850561//1	<p>I would like to add my comments to the consultation.</p> <p>This would be a very poor choice of location for the following reasons:</p> <p>inadequate access to the village</p> <p>no plans to improve the already bad public transport</p> <p>lack of facilities for local employment hence more car traffic to at best, poor roads</p> <p>Small country school with no plans for extension</p> <p>environmental reasons. This area is well documented as flooding</p>	

Respondent Name	Comment ID	Comment	Attached documents
		no plans to improve the road network through the village including traffic calming	
Wrington23	17853473//1	<p>Hi I strongly object to this planning application. As a resident in this village for over ten years, I often have to avoid travelling down this narrow lane throughout the winter months due to it being badly flooded. Sometimes the water has been knee deep and impassable for cars. The road is very narrow. The school is heavily oversubscribed and many current families living here can't even get their children into the school. The public transport facilities are very poor and there is a lack of parking around the centre of the village. It is unsafe as it is for the village children crossing the busy centre of the village to get to school with no safe crossings. With the increase in traffic this area would become a death zone. The roads around this village are too narrow to cope with this amount of new traffic as it is the roads in and out of the village are so busy and dangerous with commuters speeding in and out. This application would be adding to an already struggling village. I feel there are plenty of other more suitable areas around this area that wouldn't have such a detrimental effect on the village. This in my opinion would be disastrous not just for the current residents but also for the new residents.</p>	
B Febrey	17859425//1	<p>I have lived in Wrington for 20 years.</p> <p>During this time I have seen a gradual increase in the traffic through the village, including 40 tonne trucks which use single track lanes to enter the village. If the number of vehicles increases, there is bound to be some very nasty accidents, the lanes can barely cope with the traffic that is currently using them, let alone if there is an increase in the size of the village.</p> <p>We are very fortunate that our home has not been flooded, even though we have come close on a couple of occasions. Some of our neighbours have not been so lucky. We live in a bungalow, so we</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>live in fear of being flooded, because we would not be able to save any of our possessions by moving them upstairs! I think (as do many people) that if the area of Cox's Green were to be build on, the whole of this side of the village would probably constantly be under threat of flooding.</p> <p>This is a beautiful village, and I do understand the need for new houses, but please build in places that won't have such an adverse affect on so many people. There are sites in the village, like the old industrial site at Gatcombe Farm which would be far more suitable, and far less likely to ruin so many peoples lives.</p>	
Steve Hogg	17894561//1	<p>I have been a resident in Wrington for 25 years during which time I have seen several new developments. I am not against new houses but feel very strongly that this latest application is totally unecessary and without any justification. There are many reasons why this development should not go ahead but the two that resonate most strongly with me are the lack of school places, and the risk of flooding. How can you just plonk a load of houses into a community when the local primary school is ALREADY full? It just doesn't make any sense. There are several parents with children going to different schools. The flooding risk is also very real. Many homes have been impacted by flooding in this part of Wrington and claims that ththe developers will mitigate this are far from convincing.</p>	
Steve	17895297//1	<p>I strongly object to the land at Cox's Green being added to the Site Allocation Plan. We have serious flooding in this part of the village and adding more houses would be insane. It is likely to cause major flooding to the surrounding houses and further flooding into the village. With all the evidence available to the council from the W V A on flooding with pictures as proof this is not the place to put houses. It's clear to anyone the road network in and out of the village can not cope with more traffic due to the fact the roads are narrow and not designed for heavy traffic. I have no doubt a serious accident will happen on these very narrow roads if the traffic increases. The proposed footpath from the site to the village is clearly not possible despite what the developers say as they would need to</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>acquire private land which is not available under any circumstances. I hope the council see sense and reject this site for building any amount of housing.</p>	
Rod T	17900801//1	<p>We strongly oppose this potential development for the reasons recently brought up in the public enquiry for a larger development on the same site. These have already been stated in the Wrington Village Alliance's submission for this new potential development, but in particular:</p> <p>(i) the additional traffic into the village to access amenities that are already stretched or oversubscribed such as the school, parking and the recent announcement about consultation to close the doctors surgery to name a few.</p> <p>(ii) the regular flooding of access roads to the area - we have had a car written off due to flood water in Nates Lane</p> <p>(iii) the safety of significant pedestrian traffic along the route, and the inability to provide a viable footpath option to the village centre</p> <p>(iv) the access needed to the Burnett Industrial Estate, which if cut back could risk these businesses moving elsewhere.</p> <p>In addition the proposed loss of a green habitat on this side of the village would adversely change the character of this side of the village, and would be totally out of keeping with the rest of the village..</p>	

Respondent Name	Comment ID	Comment	Attached documents
Dr & Mrs HR Denny	17923105//1	<p>We wish to comment on and oppose the plan under consideration to build 28 houses at Cox's Green Wrington (MM25).</p> <p>The fields on this site are on a flood plain bordered by the river and a network of springs which always floods during heavy rain. Wrington has had serious flooding issues in the past and this can only get worse if the land is concreted over.</p> <p>All the roads coming into the village are narrow, winding and can become very congested at peak times. Delivery lorries coming and going to the trading estates use our village as a rat run between A38 and A370 and frequently get stuck on the High Street. Parking is very limited and the school is full. If the application for 59 houses by Redcliffe Homes is approved on this site , and this also goes through, it will change the character and integrity of our lovely village for ever. Please protect Wrington from developments of this size.</p>	
Richard Thorn	17923233//1	<p>Your proposed plan for 28 new houses to be built on this site in no way answers or defeats the previous objections to the proposal for 59 houses by Redwood. All the points made about changing the character of the area, the lack of local amenities, especially places at Wrington School, the extreme danger from traffic on local roads, the proven risk of flooding, all these are in no way obviated by the reduced number of houses. If the government's stated objective in enhancing local participation means anything at all, then this is a model instance of the need for such advice, and the inadvisability of following top-down regulation which cannot logically counter local knowledge and interests.</p>	
Tony	4042689//2	<p>Objection made by Tony Harden. I am a Fellow of the Institution of Chartered Engineers and Chartered Engineer with many years experience in site allocations and planning applications.</p>	<p> main objection grounds pdf.pdf (117 KB)</p> <p> Appendix E - Flood Record v2.1 pdf.pdf (24.5 MB)</p>

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="501 464 831 491">Sustainable Development.</p> <p data-bbox="501 600 712 627">Pedestrian access</p> <p data-bbox="501 668 1688 730">Facilities in the village of Wrington are located at walking distances from the Cox’s Green site as set out in the table below:</p> <p data-bbox="501 772 1615 834">These walking distances are mostly greater than 800metres which is Institute of Highways and Transport (IHT) “<i>preferred maximum</i>” distance.</p> <p data-bbox="501 876 1675 1046">As North Somerset Council’s (NSC’s) sustainability review of July 2016 advises (page 13), the quality and safety of walking routes is crucial in determining whether they will be used by pedestrians. It further advises that routes should offer “<i>high quality connections between homes and facilities, to allow for a range of users</i>” and sets out a number of factors to consider when assessing the quality of routes.</p> <p data-bbox="501 1088 1693 1259">The walking route from the site to the village centre is far from ideal, involving crossing the highway from side to side at a number of points, narrow footways, obstacles, absence of defined footways, walking in the close proximity of cars and HGVs, being poorly lit and subject to flooding. It cannot by any stretch of the imagination be described either as a “high quality connection” or a “convivial” route (as defined by the IHT in Planning for Walking).</p>	<p data-bbox="1722 293 2123 355"> annex A to SAP commts tony harden pdf.pdf (298 KB)</p>

Respondent Name	Comment ID	Comment	Attached documents
		<p>NSC's Site Suitability document makes no reference to the lack of sustainable travel merely noting that the site <i>"is on the edge of"</i> Wrington.</p> <p>The long walking distances and route quality are contrary to NPPF para 35 bullets 2&3 which states that</p> <p><i>"development should be located and designed where practical to :</i></p> <ul style="list-style-type: none"> • <i>give priority to pedestrian and cycle movements.....</i> • <i>create safe and secure layouts that minimise conflicts between traffic and cyclists or pedestrians....."</i> • This development site is too far from the centre of Wrington to be acceptable. <p>Access by CyclingWrington has only a few basic services. There facilities that residents may wish to access by cycle or public transport from Wrington are generally west of the village in Yatton, Congresbury and Churchill (banking facilities, rail station, supermarket, gyms, swimming pools) - refer to table below:</p> <p>There are no signed or advisory routes to any of these locations. I cycle to some of these locations (there are more facilities in Yatton and this is the normal town that local residents go to for ATM/ library/cycle spares etc). This route, which goes along West Hay Road, takes about 15-20 minutes each way. This is not a safe route and has narrow sections of road, no lighting, no verge/footway, blind corners and very bad surface in parts. In addition the route crosses the A370 at a junction with substandard visibility to the north on the inside of a tight fast downhill bend on the A370 which makes the route dangerous when cycling eastbound. It is generally accepted in the village that only experienced adult cyclists use this route - it is certainly not a safe route for children or families. I and most of my friends did not permit our children to cycle this route unaccompanied until they were 18.</p> <p>Cycling is thus not a favourable mode of travel when accessing the local and wider area.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p data-bbox="501 328 680 355">Access by Bus</p> <p data-bbox="501 395 1711 564">Sadly, there is no bus service to either Yatton or Nailsea & Backwell railway stations which serve Bristol and on to London. This means that to get a train or get to “town” one needs to go into Bristol or Weston-super-Mare by the only bus serving Wrington (A2 bus). This is unfortunate because Wrington residents have no public transport option available for them to access either of the two local railway stations prior to onward travel.</p> <p data-bbox="501 604 1711 879">The bus service to Bristol is very limited. It requires a change of bus at Bristol Airport. There is only one bus that enables local residents to get into Bristol by 9am; this leaves the village at 07.59 and after a change at the Airport, arrives in Bristol shortly before 9am. Walking time or a third bus would be needed to get to any final destination which makes regular travel to work by bus very challenging. To return from Bristol there is a frequent service to the Airport. However the service to Wrington from the Airport runs only hourly with a last bus at 7pm. Traffic between Bristol and the Airport can be subject to delay en-route and there is thus a real risk of missing the hourly Wrington service and having to wait for the next one.</p> <p data-bbox="501 919 1711 1161">The Airport runs a discount scheme for the bus (between the Airport and Bristol) for local residents including those living in Wrington. On production of appropriate address evidence, residents are able to apply by post for a discount card. This reduces the return cost to £11.50. The service also recognises Diamond Travel cards but only when the holder also has a discount card. Without both cards a cost of £15 would be incurred to travel both to and from Bristol. Residents who might want to use the bus service to Bristol more frequently are put off using the service by the high cost, poor bus frequency and the need to change buses both ways.</p> <p data-bbox="501 1201 1711 1337">Of the 31 major employers in the South West (1) only 3 are in Weston-super-Mare and of these, only 1 (Tesco) is in walking distance of the A2 bus service. Notably Weston General Hospital is not within walking distance of the A2 route. Conversely 20 of these employers are in Bristol. (1Study on Regional Infographics produced by Business in The Community March 2017.)</p>	

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		<p>There is no Sunday or Bank Holiday bus service which limits further its use.</p> <p>Overall I consider the bus service would not be a practical option for most residents at the Cox's Green site.</p> <p>The report of officers to NSC (Planning and Regulatory Committee 12 July 2017) advises that "<i>public transport trips particularly to Bristol are unlikely to occur in significant numbers, particularly for travel to work to Bristol which is likely to be the major employment destination.</i>"</p> <p>Wrington Parish Council also considers that the bus service is not a practical option for most people and has advised that this A2 service is now under review, with Firstbus having announced that the route is not considered viable due to lack of use.</p> <p>Considering the need to change bus, the infrequency of the service, and the price, we conclude that public transport services to Wrington do not accord with the principles of or NSC policy DM24 or NPPF paragraph 35:</p> <p><i>"developments should be located to;</i></p> <ul style="list-style-type: none"> <i>• have access to high quality public transport facilities."</i> <p>Bringing together the cycle and public transport challenges in Wrington, development at Cox's Green would be contrary to NPPF para 29 which states that people need to be given "<i>a real choice about how they travel.</i>"</p> <p>Cox's Green Road</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>The road from the Cox’s Green proposed site into Wrington is also called Cox’s Green. It currently does not have a footway. NSC have advised that a footway would be needed to connect the Cox’s Green site to the village. Two engineering attempts have been made by developers unsuccessfully so far to design footway which would be needed to connect site to village. Both have been demonstrated as undeliverable due to third party land whose owners will not sell. The land in question that is in third party ownership are the gardens and front hedges of the four houses that front the east side of Cox’s Green called:</p> <ul style="list-style-type: none"> • Holker House • Hazelbrook • Littlebrook • Lark Rise. <p>We attach at Annex A letters from the affected residents demonstrating they will not sell and a solicitors letter as a first step in a potential Injunction to be served in the courts.</p> <p>The Key Constraints section of NSC’s Site Suitability document states that there is a key local highways constraint which can be mitigated by “ensuring safe pedestrian access to the centre of Wrington”. Further the Site Achievability section states that there are no viability constraints. These comments fail to note that any footway would need to go through third party land as noted above which contrary to the implication in the Key Constraints document is NOT in the control of Redcliffe Homes.</p> <p>Development would thus not be deliverable as defined by NPPF para 47:</p>	

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		<p data-bbox="504 395 1659 459"><i>“To be considered deliverable, sites should be available now, ...and be achievable with a realistic prospect that houses will be delivered on the site....”</i></p> <p data-bbox="504 564 1697 735">This section of road is at its current narrowest 5.1 and widest 6.2 metres in width. It is on a blind tight bend (approximate radius 50 metres) and is already quite challenging for passing vehicles. This route takes public service buses, school buses (taking Wrigton students to and from Churchill School which is the only state secondary school in the area), refuse vehicles, commercial vehicles and large agricultural vehicles.</p> <p data-bbox="504 778 1384 807">The relevant highway standards that guide acceptability of road widths are:</p> <ol data-bbox="568 847 1688 1337" style="list-style-type: none"> <li data-bbox="674 847 1581 911">1. Page 79 of Manual for Streets (MfS) states that a 5.5m width is needed to accommodate lorries/busses in lightly-trafficked roads <li data-bbox="674 919 1648 948">2. MfS para 6.5.7 expects bus routes, which this section of road is, to be 6m wide. <li data-bbox="674 956 1682 1019">3. Appendix E to NSC Highways Development Design Guide says that roads for use by public transport should be a minimum of 6.7 metres wide. <li data-bbox="674 1027 1688 1123">4. The current bus operator First Group does not publish road width requirements but another main operator, Stagecoach, states a “clear carriageway width of at least 6.2 metres must be consistently available.” (Stagecoach Design Advice 2017 para 1.1) <li data-bbox="568 1131 1688 1267">5. To build a footway along this section of road to connect the site to the village would in all probability need the road to be narrowed. Any reduction from the current 5.1- 6m width to build a footway in highway land would not be acceptable bearing in mind the range of 5.5m to 6.7m in these standards. <li data-bbox="568 1275 1653 1339">6. Most highway design authorities also recommend that road width should be increased on roads with tight radii such as Cox’s Green to allow for the swept area of larger goods 	

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		<p>vehicles and buses and the “cut in” of trailer units. Manual for Streets 2 para 8.6.12 states that “<i>carriageway widening requirements for horizontal curves should be assessed using tracking software</i>”. Stagecoach advise that “<i>local widening should be assumed on bends, in line with results of a realistic tracking exercise.</i>” (Stagecoach Design Advice 2017 para 1.1). I have undertaken some measurements of HGVs on this road and estimate that an additional 1.2 metre width is likely to be needed for a road on this radius i.e. taking the range of suitability to between 6.7 and 7.9 metres in width.</p> <p>7. The forward visibility distance around the bend is important for all highway users. At the current 85th% speed of 30mph, the stopping sight distance (SSD) is 43 metres (Manual for Streets). With vehicles approaching each other, both vehicles would need to be able to stop i.e. both would need a 43m SSD. This results in a 86 metre distance being needed to enable approaching vehicles to stop safely. I estimate from site inspection a current SSD of only about 40-50 metres would be achieved which is significantly less than the 86 metres required.</p> <p>8. The Transport and Highways section of NSC’s Site Suitability document notes concerns with the “<i>narrow country roads</i>” and suggests this can be solved at planning application stage. The work undertaken to date by a developer shows no such acceptable scheme can be designed due to the major departures from highway standards that would be required.</p> <p>9. If Cox’s Green were narrowed it would generate severe safety problems as vehicles would approach and not be able to stop in time. The result, if one of the vehicles is wider than a car, would be a severe risk of collision, or if they did stop in time, the need to reverse around a blind bend causing risk of a further accident. This would be contrary to NPPF para 32:</p> <p><i>“ Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”</i></p> <p>Flood Risk</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>The Flood Risk Status section of NSC’s Site Suitability document totally underestimates the flood risk at this site. The Suitability document merely states that “localised flooding issues are experienced”. The flood issues and risk are much greater than noted. There are four access roads to the site: Nates Lane, Cox’s Green North, Havyatt Rd and Mill Lane. In Appendix E we provide photographic evidence that all these access roads to the proposed development site flood regularly. Many of the photographs show vehicles driving through the flood waters, however according to Phil Martin, the Devon and Somerset Fire and Rescue Area Manager: “<i>if [motorists] see floodwater on the road they should not attempt to drive through it</i>”. Given this, these roads are impassable when they flood. The Flood Risk team at NSC have been contacted and they state they have no record of road flooding occurring; this is fundamentally incorrect.</p> <p>Where Havyatt Rd and Mill Lane cross the Congresbury Yeo, these parts of the road are in the functional flood plain and are expected to flood more than areas at the edges of the Flood Zones. This is graphically illustrated in the photographic evidence.</p> <p>Looking specifically at the section of Cox’s Green road that links the site to the village of Wrington, the photographic evidence demonstrates that this section has flooded 4 times in the last 9 years. The underlying problem is that this section of Cox’s Green road is in a different natural catchment area from the rest of the development site, it being low lying and the natural route for drainage having been built on by the Burnett Industrial Estate and two new houses immediately to the north and west. Any new drainage system to solve this flooding may be impossible to build requiring either third party land, a long route through Garstons to the open stream to the west or a deep sewer to the Yeo River.</p> <p>Consequently we are left with the situation that all access roads to the site flood regularly, now and will in the future as well. Therefore safe access to the site cannot be achieved. Allowing development here would be contrary to NPPF paras 102/103 where it must be demonstrated that development must have:</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p><i>” safe access and escape routes.... including by emergency planning.... ”</i></p> <p>Attachments:</p> <p>Annex A - Letters from solicitors and other residents.</p> <p>Appendix E - Photographic Evidence of Flooding on Access Roads</p> <p>No other annexes or appendices.</p>	

Document Section	MM26
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Respondent Name	Comment ID	Comment	Attached documents
Churchill Parish Council	1190177//1	<p>CHURCHILL PARISH COUNCIL’S RESPONSE TO THE INCLUSION OF THE ‘LAND TO THE SOUTH OF THE A38 BRISTOL ROAD, CHURCHILL’ (Traffic Lights Site).</p> <p>Churchill Parish Council note that this site has now been included in the draft modification to the plan.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Churchill Parish Council does NOT SUPPORT such an inclusion. The council holds the view that the site should be withdrawn from the plan, and we have recently made a lengthy and well evidenced submission as a statutory consultee on an outline planning application for that site. The reasoning for excluding it from the plan includes:-</p> <p>1. OPENING COMMENT</p> <p>Any development of the site would be an unsustainable development outside the settlement boundary of a designated Service Village on prime agricultural land in a sensitive rural location. The development is an incongruous encroachment on the countryside, harmful to the landscape immediately adjacent to the Mendip Hills Area of Outstanding Natural Beauty and is not in keeping with the character of the settlement. Of equally serious concern is the major flooding risk it poses to the A38 and to neighbouring properties and the serious congestion and traffic issues raised by the proposed access on to the extremely busy A38. Irrespective of pressure on North Somerset Council to meet short term housing targets, the adverse impacts of this proposed development significantly & demonstrably outweigh the benefits of new housing and the site should be excluded from the plan.</p> <p>2. POLICY ISSUES</p> <p>The proposal is in conflict with Core Strategy Policy CS32 relating to Service Villages as a site of over 25 houses (outside but adjacent to the settlement boundary of the village). The proposal is also in conflict with planning policies within the Core Strategy and Policy and the North Somerset Local Plan which aim to minimise the dispersal of dwellings outside existing settlements in order to protect the character of the countryside and to reduce the need to travel. As a substantial site immediately adjacent to an AONB, it is also starkly in conflict with Paragraph 109 of the National Policy Framework which states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.</p> <p>CS20 supports an employment led economy seeking to increase sustainability by "decreasing out-commuting, provide for a large range of local jobs and reduce carbon emissions from unsustainable car use." Developing this site would result in a dormitory development for commuters which will achieve exactly the opposite.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>3. SUSTAINABLE DEVELOPMENT</p> <p>Churchill, by the assessment of NSC itself, has been assessed to be the least sustainable of the 9 Service Villages with the exception of Wroughton. The NPPF (para 7) sets out the three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:</p> <p>? <i>“An economic role –</i></p> <p>contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;</p> <p>? <i>A social role –</i></p> <p>supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and</p> <p>? <i>An environmental role – contributing to protecting and enhancing our natural, built</i></p> <p>contributing to and protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.”</p> <p>The NPPF (para 8) states that:</p> <p>“to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.”</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Any proposed development of this site fails to meet any of these criteria for sustainability:</p> <p><i>Economic -</i></p> <p>CS20 supports an employment led economy seeking to increase sustainability by "decreasing out-commuting, provide for a large range of local jobs and reduce carbon emissions from unsustainable car use." Development of this site would become a dormitory development for commuters which will achieve exactly the opposite.</p> <p><i>Social -</i></p> <p>The local primary school is already at capacity and is unfortunately on the other side of one of the busiest arterial roads of the south west but with no prospect of places being available for the new families. (See Schooling below). There are very limited social amenity infrastructure provisions within the village.</p> <p>The site is in very poorly positioned indeed. It is on the wrong side of the A38 in a self-isolating location which does not add at all to social cohesion and integration with the existing village. The creation of a substantial block of housing within what is exclusively strip development on that side of the A38 will be an incongruous oddity with 2 of its boundaries formed by the extremely busy A roads.</p> <p><i>Environmental -</i></p> <p>This development does not enhance the natural, built and historic environment. Please see Landscape and Transport and sections below.</p> <p>4. LANDSCAPE AND VISUAL IMPACT</p> <p>Development of the site would fail to protect and enhance the character, diversity and quality of the landscape. It would conflict with CS policies CS5 (landscape and historic environment), CS32 (Service Villages), the provisions of DMP policy</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>DM10 (landscape), DM11 Mendip Hills Area of Outstanding Natural Beauty) and would be contrary to paragraph 109 of the Framework.</p> <p>Moreover, significant weight should be given to the Mendip Hills AONB Management Plan 2014-2019 (MP), to the National Character Area (NCA) profile for the Mendip Hills (NCA 141) and the North Somerset Landscape Character Assessment Supplementary Planning Document (SPD).</p> <p>Detailed consideration should be given to the Appeal decision APP/00121/W/153138816 of Neil Pope, Planning Inspector, in respect of a proposed development of land south of Knightcott Road. The Inspector concluded that considerable weight can be given to the landscape issues and found it to be a major ground for rejection of the appeal. That development site ("the Knightcott site") was similarly adjacent to the AONB and the parallels with this site are extensive. It is difficult to see why a Planning Inspector would not reject this application on very similar grounds to those set out in Mr Pope's conclusions, with much the same reasoning and much the same weight.</p> <p>It is strongly arguable that the proximity of the Roman Hill Fort on Dolebury Warren makes this an even more sensitive site than the Knightcott site in respect of landscape and history. AONBs are, unlike National Parks, rather small areas and so much of their highly valued scenic quality derives from regions near their boundaries; consequently views outwards and inwards may assume great importance for the scenic integrity of the AONB itself.</p> <p>This is certainly the case at Dolebury Warren. Here the prospect north from the extensive east-west ridge contains, in the middle ground view, the settlement patterns of Churchill and Langford village as a substantial part.</p> <p>A notable feature of this settlement is the way it is broken up into small and varied built components, each separated from the others by trees, hedges and open fields. The proposed insertion, into this pattern, of a substantial block of uniform development would serve visually to join the built components together and to confer an urban appearance on an otherwise rural scene. This is indeed one reason why village settlement boundaries have become an important part of Local Authority planning policy. This visual transformation would be apparent within the AONB, not only along the Dolebury ridge but on Lyncombe Hill to the west and on Burrington Ham to the east.</p>	

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		<p>However, this is not a case of just visual impact but of the very proximity of a large residential development to a sensitive AONB which contravenes a plethora of policies referred to above and designed to protect such locations.</p> <p>5. BEST AND MOST VERSATILE LAND</p> <p>The NPPF (par 112) states that "Local planning authorities should take into account the economic benefits of the best and most versatile agricultural land.</p> <p>Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality."</p> <p>The site is on best and most versatile land Taking account of other proposed developments at Pudding Pie Lane and in Sandford, Winscombe, Banwell and Congresbury, there is the potential loss of very significant areas of best and most versatile land in what is a small radius area.</p> <p>6. HIGHWAYS.</p> <p>(i) Location</p> <p>The site is narrow & tapers between natural frontage of A38 Bristol Rd & A368 Bath Road. These principal roads create the western site boundary & form part of the traffic light controlled, 4 way, Churchill crossroads.</p> <p>Together with an adjacent upland area of Mendip AONB, these principal roads & their junction dominate the site.</p> <p>No accommodation is made re pending JSP & JTS. The site should not be included in the plan thereby avoid prejudicing these ongoing West of England policies.</p> <p>(ii) Access</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Vehicular access from the A38 Bristol Road would cause difficulty for school & medical centre traffic as well as other users approaching or leaving the acute Ladymead Lane junction.</p> <p>Movement risks in this area will be increased by the A38 bus stop.</p> <p>The statutory requirement for turning visibility East of the proposed access is questioned, particularly with the increased number of pedestrians that will be encouraged to use the proposed crossing point & footway.</p> <p>Existing evidence of westbound A38 queue lengths on the approach to the traffic lights demonstrates that the PAR requirements cannot be met. At peak flows on a daily basis A38 westbound is jammed past the proposed development access. This is exacerbated on Thursday & Friday late afternoons over several hours while the increasingly frequent restrictions on M5 add to this problem at any time of a 24 hour/7 day week.</p> <p>Parish council concerns regarding this in no way remove support from our view that the PAR correctly embargoes access from A368</p> <p>7. DRAINAGE/FLOODING</p> <p>(i) Surface Water Drainage</p> <p>The ground is of low permeability. Of the 3 infiltration tests recently commissioned by an applicant developer only one is completed and this gives questionable infiltration results.</p> <p>If ever developed as a site the council asserts that it will lead to major increases in flooding in and around the new development.</p> <p>(ii) Foul Water Drainage</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Wessex Water is having to undertake previously unforeseen work to accommodate recent development approved in Churchill Parish. These works may increase the flood risk adjacent to Langford Brook.</p> <p>If developed, this site will add to the need for even more FW drainage improvement & a raised urgency for North Somerset Council to address even more flooding in Lower Langford.</p> <p>(iii) General Comments:-</p> <p>North Somerset Local Flood Risk Management Strategy Feb 2014 identifies the top 15 communities in North Somerset which are considered to be most vulnerable to flooding from surface runoff, ordinary watercourses and groundwater. It identified the measures proposed to be taken in these communities to reduce flood risk, <u>subject to sufficient funding and resource availability.</u></p> <p>The top 15 communities in North Somerset considered being most vulnerable to flooding from surface runoff, ordinary watercourses and groundwater are:</p> <p>Backwell, Long Ashton, Churchill, Nailsea, Claverham, Pill, Clevedon, (East) Portbury, Congresbury, WIncombe, Hutton, Wrington, Langford, Weston-Super-Mare</p> <p>8. TRANSPORT</p> <p>The village is very poorly served in terms of public transport with 1 indirect bus per hour to Bristol, and no local cycle routes. There are no taxi businesses based in Churchill or Langford. Cycle rides to Yatton station would include the highly dangerous nature of the B3133 particularly with regard to pinch points on Stock Lane where HGVs regularly are obliged to cross the centre of the road. This is not in any way a safe cycle route. No local employment will be attracted or generated by development of this site which will be of a dormitory nature and all residents will rely heavily on private cars and commute to work.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Accordingly, any development of this site would lead to further undesirable and unsustainable out commuting to work and is contrary to local policies (CS20) and NPPF criteria.</p> <p>9. SCHOOLING</p> <p>Considerable additional primary school numbers would be generated by any proposed development of the site. This, when taken together with the 3 substantial and recently approved developments in the village at Pudding Pie Lane and Says Lane would lead to unsustainable and non workable schooling provision.</p> <p>Churchill Primary School is the only school within 2 miles of this site. It cannot be expanded on its current site to accommodate such an increase in its pupil numbers.</p> <p>We understand that there are no plans or funds for new primary schools in the area. The one site that might allow potential expansion opposite and across Pudding Pie Lane is one of the 3 approved housing sites. Therefore the proposal to include this site is unsustainable on grounds that there will be no adequate schooling provision at primary level. Any 'per pupil' financial contribution from the developers would be irrelevant. In addition any solution proffered of providing school transport to mitigate a lack of school places is of no value in light of the influx of development across a so many villages all of which have no capacity to cope with the scale of pupils these combined speculative developments will bring.</p> <p>In respect of secondary school places at Churchill School, there is no safe route to school from the site.</p> <p>10. PARISH PLAN AND COMMUNITY OBJECTION</p> <p>Between 2005 and 2008, the Parish produced a very comprehensive Parish Plan following an extensive review of various aspects of the village and full consultation with the all the householders. In respect of Housing and Development, overwhelmingly residents who expressed a view (89% of 1109) felt it was either vital or very important to preserve the character of the villages of Churchill and Langford. 33% were against any further development and 50% were in favour of some new housing but for local people or those in vital services. Whilst this document doesn't have the legal standing of the</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Neighbourhood Plan the Parish has begun the process of producing, it still has relevance today as the village has changed very little since it was completed in 2008.</p> <p>At a recent public meeting on 17th May 2017, attended by over 300 residents, considerable concern was expressed about the 3 approved applications and the proposal in the Joint Spatial Plan for a Garden Village nearby. These 4 developments and the JSP proposals amount to the rapid, un-cohesive and chaotic urbanisation of the villages of Churchill and Langford.</p> <p>11. CUMULATIVE EFFECT OF OTHER APPLICATIONS</p> <p>The village is facing a tsunami of speculative planning applications on greenfield sites outside the settlement boundary, 3 now approved and others in the application stage. There is the prospect of well over 250 new houses in a village of 880 dwellings and an increase in population of circa 1,100 to a current population of 2,200 (2011 census). This represents a 50% increase in population with no social, environmental and economic benefit whatsoever, and more importantly, no infrastructure improvement provision in the immediate future.</p> <p>Neighbouring villages of Winscombe, Sandford, Congresbury, Banwell, Yatton and Claverham also face significant developments.</p> <p>CONCLUSION :-</p> <p>This Parish Council asserts that the Site Allocations Plan needs to recognise all the above factors that evidence and demonstrate that the inclusion of this site in the submitted modification to the Plan is not justifiable or acceptable.</p>	
sstockwell	17904513//3	Please see my comment entered in relation to Broadleaze Farm, Winscombe, at MM24.	
Mendip Hills AONB unit	698049//5	North Somerset Site Allocations Plan – Main Modifications Consultation	

Respondent Name	Comment ID	Comment	Attached documents
		<p>With reference to the above consultation and the Executive Committee decision on 5 September 2017 to include an additional 22 housing sites comprising 821 dwellings within the North Somerset Site Allocation Plan, comments from the Mendip Hills AONB Unit as follows:</p> <p>Included within the additional 22 housing sites are a number of proposed housing sites adjacent to or in close proximity of the nationally protected landscape of the Mendip Hills Area of Outstanding Natural Beauty. Land off Shipham Lane, Winscombe as set out on the Site Allocation Plan: Further Assessment of Residential Sites sheet is partly within the Mendip Hills AONB.</p> <p>These sites include:</p> <ul style="list-style-type: none"> • MM22 Land off Shipham Lane, Winscombe (outside settlement boundary and part of site within the Mendip Hills AONB) – proposed units 28. • MM23 Land adjoining Coombe Farm, Winscombe (outside settlement boundary and adjacent to Mendip Hills AONB) – proposed units 24. • MM24 Broadleaze Farm, Winscombe (outside settlement boundary and adjacent to Mendip Hills AONB) – proposed units 80 (74). • MM29 Station Road, Sandford (outside settlement boundary – not related to settlement boundary and adjacent to Mendip Hills AONB) – 16 units. • MM26 Land south of Bristol Road, Churchill (outside settlement boundary) – 41 units. <p>Further, Land north of Greenhill Road, Sandford was granted planning permission at appeal – proposed units 118.</p> <p>Thus, there are proposals for a cumulative total of 307 (301) dwellings on the northern edge of the Mendip Hills AONB.</p> <p>The Countryside and Rights of Way (CRoW) Act 2000 confirmed the significance of AONBs and Section 85 places a statutory duty on all relevant authorities to have regard to the purpose of conserving and enhancing natural beauty when discharging any function in relation to, or affecting land within an Area of Outstanding Natural Beauty. Potential development proposals outside of the boundaries of AONBs that may have an impact within the designated area are also</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>covered by the ‘duty of regard’. The primary purpose of the AONB designation is to conserve and enhance natural beauty. The Mendip Hills AONB Partnership produced the AONB Mendip Hills Management Plan 2014-19 as required by the Act on behalf of the joint local authorities. The Management Plan under paragraph 1.4 sets out a Statement of Significance on the special qualities of the Mendip Hills AONB and these qualities include views in and out of the AONB, settlements of Mendip stone largely confined to the spring line, retaining dark skies and a sense of tranquillity.</p> <p>The National Planning Policy Framework (NPPF) under paragraph 115 sets out that ‘great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.’ Further, with regards to Land off Shipham Lane, Winscombe, the NPPF sets out that ‘Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest and meets with other considerations as set out under paragraph 116.’</p> <p>Within the Site Allocations Plan: Further Assessment of Residential Sites assessment sheets, whilst it is identified on a number of sites that ‘Site development may have some adverse impact’ on the Mendip Hills AONB, there is no analysis of the impact of development proposals on the special qualities and landscape characteristics of the nationally protected landscape and regard to the purpose of conserving and enhancing natural beauty. Of particular concern are the suburban densities proposed immediately adjacent to the Mendip Hills AONB which do not reflect surrounding village densities and impact on landscape characteristics of settlement edges. Further, consideration must also be had to the potential cumulative impact of the proposed housing sites on the tranquillity of the Mendip Hills AONB and in particular highways considerations and cumulative impact on the road network system. One of the issues impacting on the Mendip Hills AONB is that routes across the AONB are frequently used as short cuts by through traffic, affecting both tranquillity and the environment of the nationally protected landscape. We further highlight strong concerns regarding the inclusion of MM29 (Land at Station Road, Sandford), a proposal for 16 units of suburban design adjacent to the Mendip Hills AONB outside of the settlement boundary and contrary to the spatial strategy and Policy CS33 of the adopted North Somerset Core Strategy.</p> <p>Should you require further information, please do not hesitate to contact the Mendip Hills AONB Unit.</p>	

Document Section		MM27	
Respondent Name	Comment ID	Comment	Attached documents
sstockwell	17904513//4	Please see my comment entered in relation to Broadleaze Farm, Winscombe, at MM24.	
Cresten Boase	5118977//3	Please see my comment in respect of Land at Shipham Lane, Winscombe, at MM22	

Document Section		MM29	
Respondent Name	Comment ID	Comment	Attached documents
sstockwell	17904513//5	Please see my comment entered in relation to Broadleaze Farm, Winscombe, at MM24.	
Mendip Hills AONB unit	698049//4	<p>North Somerset Site Allocations Plan – Main Modifications Consultation</p> <p>With reference to the above consultation and the Executive Committee decision on 5 September 2017 to include an additional 22 housing sites comprising 821 dwellings within the North Somerset Site Allocation Plan, comments from the Mendip Hills AONB Unit as follows:</p> <p>Included within the additional 22 housing sites are a number of proposed housing sites adjacent to or in close proximity of the nationally protected landscape of the Mendip Hills Area of Outstanding Natural Beauty. Land off Shipham Lane, Winscombe as set out on the Site Allocation Plan: Further Assessment of Residential Sites sheet is partly within the Mendip Hills AONB.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>These sites include:</p> <ul style="list-style-type: none"> • MM22 Land off Shipham Lane, Winscombe (outside settlement boundary and part of site within the Mendip Hills AONB) – proposed units 28. • MM23 Land adjoining Coombe Farm, Winscombe (outside settlement boundary and adjacent to Mendip Hills AONB) – proposed units 24. • MM24 Broadleaze Farm, Winscombe (outside settlement boundary and adjacent to Mendip Hills AONB) – proposed units 80 (74). • MM29 Station Road, Sandford (outside settlement boundary – not related to settlement boundary and adjacent to Mendip Hills AONB) – 16 units. • MM26 Land south of Bristol Road, Churchill (outside settlement boundary) – 41 units. <p>Further, Land north of Greenhill Road, Sandford was granted planning permission at appeal – proposed units 118.</p> <p>Thus, there are proposals for a cumulative total of 307 (301) dwellings on the northern edge of the Mendip Hills AONB.</p> <p>The Countryside and Rights of Way (CRoW) Act 2000 confirmed the significance of AONBs and Section 85 places a statutory duty on all relevant authorities to have regard to the purpose of conserving and enhancing natural beauty when discharging any function in relation to, or affecting land within an Area of Outstanding Natural Beauty. Potential development proposals outside of the boundaries of AONBs that may have an impact within the designated area are also covered by the ‘duty of regard’. The primary purpose of the AONB designation is to conserve and enhance natural beauty. The Mendip Hills AONB Partnership produced the AONB Mendip Hills Management Plan 2014-19 as required by the Act on behalf of the joint local authorities. The Management Plan under paragraph 1.4 sets out a Statement of Significance on the special qualities of the Mendip Hills AONB and these qualities include views in and out of the AONB, settlements of Mendip stone largely confined to the spring line, retaining dark skies and a sense of tranquillity.</p> <p>The National Planning Policy Framework (NPPF) under paragraph 115 sets out that ‘great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.’ Further, with regards to Land off Shipham</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Lane, Winscombe, the NPPF sets out that ‘Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest and meets with other considerations as set out under paragraph 116.’</p> <p>Within the Site Allocations Plan: Further Assessment of Residential Sites assessment sheets, whilst it is identified on a number of sites that ‘Site development may have some adverse impact’ on the Mendip Hills AONB, there is no analysis of the impact of development proposals on the special qualities and landscape characteristics of the nationally protected landscape and regard to the purpose of conserving and enhancing natural beauty. Of particular concern are the suburban densities proposed immediately adjacent to the Mendip Hills AONB which do not reflect surrounding village densities and impact on landscape characteristics of settlement edges. Further, consideration must also be had to the potential cumulative impact of the proposed housing sites on the tranquillity of the Mendip Hills AONB and in particular highways considerations and cumulative impact on the road network system. One of the issues impacting on the Mendip Hills AONB is that routes across the AONB are frequently used as short cuts by through traffic, affecting both tranquillity and the environment of the nationally protected landscape. We further highlight strong concerns regarding the inclusion of MM29 (Land at Station Road, Sandford), a proposal for 16 units of suburban design adjacent to the Mendip Hills AONB outside of the settlement boundary and contrary to the spatial strategy and Policy CS33 of the adopted North Somerset Core Strategy.</p> <p>Should you require further information, please do not hesitate to contact the Mendip Hills AONB Unit.</p>	

Document Section	MM3
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Respondent Name	Comment ID	Comment	Attached documents
Amy Shepherd, SCC	11359617//1	Introduction	

Respondent Name	Comment ID	Comment	Attached documents
		<p>Somerset County Council welcomes the opportunity to respond to this consultation.</p> <p>Please find comments from the County Council Acoustics Specialist.</p> <p>Should you have any queries regarding the comments, please contact Amy Shepherd, Corporate Performance Officer on 01823 359225 or aashepherd@somerset.gov.uk</p> <p>Consultation response</p> <p>The County Council Acoustics Specialist has comments relating to MM3.</p> <p>The policy SA8 (Undesignated Green Space) states the following:</p> <p>‘Development proposals affecting undesignated green spaces will be acceptable provided they do not have a detrimental impact on green infrastructure by adversely affecting spaces which make a worthwhile contribution to amenity and/or the townscape, character, setting, visual attractiveness of the settlement.’</p> <p>With the supporting statement:</p> <p>‘The assessment of whether the effect of the development is acceptable or not in terms of the impact on green infrastructure should be made with regard to its effect on the value of the site for amenity, and/or the townscape, character, setting and visual attractiveness of the settlement.’</p> <p>The location of undesignated green spaces could be close to commercial land uses and as such noise sensitive housing development acceptable under the current SA8 could then have a constricting influence on commercial land uses, and the County Council Acoustics Specialist considers that this point is not identified. This same point is however made within the revised text associated with Policy SA4 when considering the impact of changing development uses of commercial/business land.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>While Policy SA8 might enable the development of housing it may also be necessary to highlight that there may be a need to adopt special design features if housing is to be compatible with existing, or potentially acceptable, impacts that might arise from adjoining land uses. Guidance in this consideration is provided within the recently published ProPG.</p> <p>The County Council Acoustics Specialist would also make a more general point regarding any housing development allocated to land near to major highways. Present requirements of Noise Action Planning require highway authorities and the Highways Agency to recognise residential development that is exposed to high levels of traffic noise from major roads, as identified by noise mapping, and to then propose and undertake mitigating actions where possible. It would therefore appear logical that any new development sites near to major roads should not conflict with NAP aspirations and be such as to require retrospective mitigation to be taken under the Environmental Noise (England) Regulations 2006.</p>	
Rob Turvey	14724001//1	<p>The Uplands Open Space is precisely the type of site that “makes a worthwhile contribution to amenity and/or the townscape, character, setting, visual attractiveness of the settlement.” It is intensively used by Nailsea residents to exercise, relax and breath good clean air whilst witnessing and enjoying nature and the changing seasons. It’s development for housing will be a huge public amenity loss and its current inclusion in the SAP should be removed.</p>	
Richard Lewis	14731809//2	<p>If Green space is important why is land south of the Uplands, Nailsea still being considered for development. This is an area that is widely used by the public of the town.</p>	
David	17725569//2	<p>Where existng green space is developed a detailed wildlife assessment should be carried out, and measures taken to ensure that wildlife corridors are maintained through these spaces.</p>	

Respondent Name	Comment ID	Comment	Attached documents
Sport England	8126849//1	<p>Further to the original response to the 2016 publication version of the Site Allocations, Sport England has a couple of comments to the proposed modifications consultation publication.</p> <p>Clarification in relation to Policy SA8 Undesignated Green Space – MM3 (para 4.45 page 30)</p> <p>Playing pitch / playing field sites fall under the protection of para 74 of the NPPF. This includes playing field land that were once used as playing pitches for pitch sport as defined by legislation and there is no time limit on land last used. Unless there has been a change in land use by formal application or permitted development.</p> <p>Leisure colleagues at the Council have just initiated a Playing Pitch Strategy and this work should all playing field land / playing pitches in N Somerset including those in use, those who have had a past use and ones allocated for future use. These sites should be captured on the Local Plan Proposals/Constraints Map to guide future development proposals.</p> <p>Response required – clarification that playing pitches/playing field land does not form undesignated green space (Policy SA8).</p>	

Document Section	MM36
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Respondent Name	Comment ID	Comment	Attached documents
Clevedon Town Council (I Johnson)	8141825//1	Clevedon Town Council has made the following comments on the main modifications consultation;	

Respondent Name	Comment ID	Comment	Attached documents
		<p>BROOKFIELD WALK to remain as a designated Local Green Space and a Strategic Open Space (MM36, MM71, MM76). Clevedon has a shortfall of green spaces as has been confirmed by North Somerset Council in the past. This is an essential green space in the town.</p> <p>Please note these comments are subject to ratification at the next full Council meeting on 22nd November 2017.</p>	

Document Section	MM38
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Respondent Name	Comment ID	Comment	Attached documents
Gladman Developments Ltd	11199745//1	<p>Strategic Gaps</p> <p>Introduction</p> <p>This representation is an individual response submitted by Gladman Developments Ltd (Gladman) to the current consultation on the Main Modifications of the Sites and Policies Plan Part 2: Site Allocations Plan (SAP). Public consultation commenced on 18th September and closes on 30th October 2017.</p> <p>This representation deals with the issue of Strategic Gaps only. Gladman have previously submitted evidence on this issue within their Matter 5 (Local Green Space and Strategic Gaps) Hearing Statement to the SAP Examination and also provided oral evidence on this matter at the Hearing session on 18th May 2017.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>The Inspector’s Post Hearing Note to the Council (ID-4) responds to the urgent need for North Somerset to identify additional housing to ensure there is confidence that the adopted housing requirement will be met in full by 2026. The Inspector requires additional sites to conform broadly to the Core Strategy spatial strategy and provide a wide choice of sites, the outcome of which would inevitably be a requirement to seek positive opportunities for growth on the edge of the larger settlements, including within strategic gap. The Council, within their main modifications, have still failed to achieve this goal.</p> <p>Strategic Gaps are not supported by the NPPF, they are not an ‘environmental’ designation and certainly are not they type of designation protected by NPPF 14 footnote 9. They do not preclude land from benefitting from the presumption in favour of sustainable development. Their role in North Somerset, in terms of shaping a sustainable pattern of development, has not been properly tested or justified.</p> <p>The opportunity existed for the Council to consider the merits for the proposed Strategic Gaps and realise the opportunities that existed for sustainable development in those areas so they achieve their housing goals. The negative approach, ruling out the positive consideration of land within gap (the principle of which was justified many years ago, against now out-dated planning policy and housing requirements) is an approach that is unjustified and ineffective. It is not sound, it is stifling the district and preventing the Council from achieving their modest goals for sustainable development outlined the Site Allocations Plan.</p> <p>Post Submission of Hearing Statements to SAP Examination</p> <p>Prior to the Hearing sessions commencing, the Council published a retrospective Sustainability Appraisal for the Strategic Gap designations (CS13 Council Statement Matter 5.4). This document was tailored to fit with the Council’s published draft policies and clearly failed to consider reasonable alternatives. The alternatives considered on this topic are ‘SAP allocation’ or ‘No Plan’. This is not acceptable and fails to adequately justify the imposition of such a policy. As a consequence, the plan as proposed to be modified remains unsound.</p> <p>SCI (Meet Housing Requirement) states that there would be a ‘neutral effect’ because the SAP makes sufficient allocations to meet the housing requirement. The Council acknowledge in CD4a (September 2017) that they cannot</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>demonstrate a five-year housing land supply (4.8 years) - a shortfall of 375 dwellings on their own five-year deliverable supply. Using the development industry consortium's five-year deliverable supply figures, the shortfall is significantly greater at 3,421 dwellings (3.2 years).</p> <p>At the hearing sessions held in May 2017, the matter of Strategic Gaps was not fully explored as it had become quite apparent that the Council had failed to develop a plan that positively planned for housing in the area. Whilst the Inspector, in requiring the allocation of additional housing sites, notes the environmental constraints in the district and a number of environmental/technical factors that will slow down the delivery of allocated sites, she does not, in any way, suggest that land within strategic gap should be ruled out. Conversely, she requires additional sites to conform broadly with the Core Strategy spatial strategy and provide a wide choice of sites, the outcome of which would inevitably be a requirement to seek positive opportunities for growth on the edge of the larger settlements, including within strategic gap. Significantly, the NPPF calls for:</p> <ul style="list-style-type: none"> ▪ Local planning authorities to seek opportunities for sustainable development avoiding adverse impact on the three dimensions of sustainability and where possible pursue alternative options which reduce or eliminate negative impacts (NPPF 152). ▪ The plan to be justified with reference to reasonable alternatives (NPPF 182). <p>Strategic Gap between Weston-super-Mare, Locking and Parklands Village</p> <p>The Strategic Gap between Weston-super-Mare, Locking and Parklands Village has been amended to include land to the south of the existing designation, the static homes on Fir Tree Avenue and Oaktree Parks. The Council maintains in MM38 that this is a logical southern extension of the part of the strategic gap between Oaktree Parks Ltd and Locking and would help to retain the separate identity, character and landscape setting of the settlements.</p> <p>It is unclear why the Council <u>now</u> considers that adding a spur to the south of the existing Weston-super-Mare, Locking and Parklands Village Gap is necessary or sound. There is no explanation in any of the supporting evidence to justify this amendment.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>The Council undertook a detailed review into the boundaries of the proposed Strategic Gap in October 2016. In respect of the gap between Weston-super-Mare and Hutton, no alterations were proposed save for an extension to the west to allow it to abut the settlement boundary of Weston. The land put forward in the February 2017 extension was not even considered. In respect of the gap between Weston-super-Mare, Locking and Parklands Village, no alterations were recommended and the report specifically stated:</p> <p>‘Taking account of the above, there is no identified need to amend the boundaries of this strategic gap.’</p> <p>Gladman strongly objects to the proposed amendment to include land east of the Oaktree Caravan Park and west of the former Elm Grove Nursery site. Gladman’s outline application on Land at Elm Grove Nursery, Locking (application ref: 15/P/1205/O) was refused in March 2017, with the first reason for refusal stating the development of this site would cause coalescence between the Locking settlement boundary and Oaktree Park. The Landscape Officer had <u>no objection</u> to the application in his consultee response and maintained that:</p> <p>The proposed development of up to 145 houses and associated green infrastructure would be appropriate within this landscape context and it is judged that the effects, as a result of the proposed development, would not give rise to any unacceptable landscape and visual harm.</p> <p>The result of this proposed designation is restricting a wholly sustainable site, adjacent to the settlement boundary of Locking, from being delivered and significantly boosting the Council’s current dire five year housing land supply position. Gladman’s site was included in Part 1 of CD2a – Schedule of sites to be assessed but was not chosen to be assessed further.</p> <p>In our Matter 5 Hearing Statement to the SAP Examination (HS-5-5), Gladman contested that there is absolutely no justification whatsoever for the inclusion of this land within the strategic gap; indeed, it appears that it has been submitted at the last minute for inclusion within the strategic gap by the Executive Member for Housing to prevent development from taking place on this site, which incidentally falls within his ward. This is the first opportunity the proposed extension of this strategic gap has been made available for public consultation.</p>	

Respondent Name	Comment ID	Comment	Attached documents
		<p>The Council's own Sustainability Appraisal and evidence base fails to demonstrate that the proposal to include a strategic gap policy in the SAP is justified. It fails to set out the benefits of gap policy and how it is essential to help shape the future settlement pattern so as to allow for the projected growth whilst avoiding loss of settlement identity. It fails to test the effect on the three dimensions of sustainable development with and without strategic gap policy.</p> <p>Gladman do not consider that it is necessary or justified to include strategic gaps around service and infill villages, as Core Strategy Policies CS32 and CS33 already provide policy protection in this regard. As requested by Inspector Bore at the Remitted Policies Re-examination, flexibility has been built into these policies to allow residential development adjacent to smaller villages, however such sites are subject to criteria which ensure that only sustainable development will be permissible. As such, any development which is likely to cause significant adverse landscape harm, such as the erosion of a perceptual or functional gap between settlements, would not be acceptable in any event as it would not be considered sustainable.</p> <p>The lack of evidence presented on this matter underlines the fact that the Council's proposal is inconsistent with national policy which does not provide support for local designations which prevent sustainable development, it is unnecessary and undermines the effectiveness of the plan to deliver sustainable development. It is a policy led by the political desire to prevent development in this area and not, as Strategic Gaps should be, to prevent coalescence of settlements.</p>	

Document Section	MM54
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Respondent Name	Comment ID	Comment	Attached documents
Rob Turvey	14724001//3	For the reasons set out at MM3 & MM54 above neither Youngwood Lane nor The Uplands should be included in the SAP	

Respondent Name	Comment ID	Comment	Attached documents
Diane	8052353//1	The proposed development to the south of Nailsea (Youngwood Lane) appears inconsistent with maintaining a strategic gap between Nailsea and Backwell, particularly as it would set a precedent for large numbers of additional houses to be approved on adjacent land in the future, stretching further across the valley towards Backwell.	

Document Section	MM55
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Respondent Name	Comment ID	Comment	Attached documents
Rob Turvey	14724001//5	<u>MM55</u> - Without prejudice to Policy DM35 of the Sites and Policies Part 1: Development Management Policies, any properties constructed on the Uplands Public Open Space should be of similar structure and design to those that the land currently borders.	

Document Section	MM62
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Respondent Name	Comment ID	Comment	Attached documents
ajh	11806881//2	See Attachment for comments regarding MM25 and MM62	 20171030 - SAP Submission.pdf (106 KB)

Respondent Name	Comment ID	Comment	Attached documents
Tony	4042689//1	see comment from Tony Harden under MM25	

Document Section	MM71
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Respondent Name	Comment ID	Comment	Attached documents
Clevedon Town Council (I Johnson)	8141825//2	<p>Clevedon Town Council has made the following comments on the main modifications consultation;</p> <p>BROOKFIELD WALK to remain as a designated Local Green Space and a Strategic Open Space (MM36, MM71, MM76). Clevedon has a shortfall of green spaces as has been confirmed by North Somerset Council in the past. This is an essential green space in the town.</p> <p>Please note these comments are subject to ratification at the next full Council meeting on 22nd November 2017.</p>	

Document Section	MM75
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Respondent Name	Comment ID	Comment	Attached documents
Bleadon Parish Council	8134145//2	<p>Reference AM103 – Community Facilities Schedule (page 84) Topic; Strategic Open Space – West Bridge Road Bleadon; Proposed amendment: Delete the strategic open space allocation; Comment: ‘Land is privately owned and proposal not funded or in any programme.’</p> <p>Bleadon Parish Council objects to any change to the original description of the allocation of the land west of Bridge Road, Bleadon and supports the continual designation of use of the land as being for recreational purposes.</p>	

Document Section	MM76
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Respondent Name	Comment ID	Comment	Attached documents
Clevedon Town Council (I Johnson)	8141825//3	<p>Clevedon Town Council has made the following comments on the main modifications consultation;</p> <p>BROOKFIELD WALK to remain as a designated Local Green Space and a Strategic Open Space (MM36, MM71, MM76). Clevedon has a shortfall of green spaces as has been confirmed by North Somerset Council in the past. This is an essential green space in the town.</p> <p>Please note these comments are subject to ratification at the next full Council meeting on 22nd November 2017.</p>	

Document Section	MM79
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Respondent Name	Comment ID	Comment	Attached documents
Wrington Parish Council	1019201//3	<p>Policy SA8 – Community Use Allocations</p> <p>We have commented previously that we were pleased to see that designation of land to the south (and east) of Rickyard Rd had been carried over as strategic open space for community use. We had emphasised our support for this designation.</p> <p>We now find it suggested under MM79 and AM107, and what is described as;</p> <p>‘Strategic Open Space - South of Rickyard Road, Wrington’, to ‘Delete the strategic open space allocation’ with this justified as the ‘Land is privately owned and proposal not funded or in any programme’.</p> <p>It seems to us irresponsible that NSC should propose this change when there has been no local consultation on the matter and we suggest that NSC was not in any position to reach this conclusion. The Council has certainly not been asked to comment on any plans for the future or on any programme.</p> <p>Of course the land is privately owned, as most land is, although the landowner was in agreement with the original designation. There are two pieces of land concerned, these separated by a track connecting Silver Street to Rydings Farm. An all weather bowling green was constructed on part of the land to the south of the track. This is now a well used and very successful community facility.</p> <p>Possibilities considered for future use are a multi-use games area on land between the track and the Recreation Field, and an all weather football pitch on the land to the north of the track. This community use designation is accepted, well known locally and provides a basis for longer term planning, and should certainly not be deleted. We would urge NSC to reconsider this since, if not, the land might then not be available when it is needed for a future community use development.</p>	

Report run at 9 Nov 2017 15:53:40. Total responses: 155.