North Somerset Site Allocations Plan: Proposed Modifications

Summary of representations received and Council response

November 2017

No	Respondent	Agent	Specific modifications comments relate to	Summary of comments	Council response
1	Fisher German		-	 Standard advice relating to pipelines 	Noted.
2	KRG22		-	Object to large scale development at Nailsea on the basis of insufficient transport infrastructure	The level of growth proposed at this stage can be accommodated as long as reasonable mitigation is provided by developers. Highways England are satisfied that there will not be a severe impact on the SRN.
3	National Grid	AMEC	-	No comment	Noted.
4	Coal Authority		-	No comment	Noted.
5	Historic England		-	 Concern regarding the council's evidence base to determine the level of harm to heritage assets, and request that a heritage report is produced for each additional allocation and the previously proposed Birnbeck Pier site 	The council has considered the potential impact on heritage assets from the additional sites identified in the proposed modifications as part of the further site assessment work. Where relevant, this has been referenced in the site specific notes column of Schedule 1 of the plan. The council are satisfied that the level of detail assessed to date is proportionate, and that current/future planning applications will be expected to demonstrate the level of impact on any heritage assets and mitigate against it if necessary.
6	Banwell Parish Council		-	 Concerned about the potential cumulative impact of additional traffic in Banwell as a result of the proposed allocations in Churchill, Sandford and Winscombe 	The level of growth proposed at this stage can be accommodated as long as reasonable mitigation is been provided by developers. Highways England is satisfied that there will not be a severe impact on the SRN.
7	Locking Parish Council		-	 Support the principle of protecting infill villages from further development, and 	Support noted.

			consider 821 additional dwellings a sufficient uplift	
8	Backwell Parish Council	-	• Support	Support noted.
9	Diane	AM50	 Unclear why AM50 deletes the requirement for a local shop as part of the Trendlewood Way allocation 	There was local opposition to this so the landowners deleted it from their initial plans.
10	Portishead Town Council	-	Agree with the proposals	Support noted.
11	Vic Slater	-	 Query over the quantum of housing required Proposed allocations at Coombe Farm and Shipham Lane Winscombe have previously been dismissed at appeal and should not be considered again Query over levels of growth required by the Joint Spatial Plan 	The housing requirement is set by the adopted Core Strategy. We appreciate that these sites have been previously refused, however the planning context has changed, which has led to them being re-assessed. The Joint Spatial Plan housing requirement is outside of the scope of the proposed modifications consultation.
12	Mr Sanders Sutherlan Property a Legal Services		 The council have failed to address the lack of housing supply in accordance with the Inspector's request The council have failed to assess all omission sites The council have failed to assess the sustainability of Bleadon as a location for growth The council have failed to specifically assess a particular site in Bleadon that is being promoted by the respondent 	The council's letter to the Inspector (CD2) sets out the council's proposed methodology for the further assessment work, and alternative calculations for the required uplift. To boost the five year supply, the new allocations must be deliverable, and as such sites that are not within the development pipeline have not been re-assessed, reflecting the developer view that it takes on average 5.5 years from submission of a planning application to seeing completions on site. The adopted Core Strategy sets the spatial hierarchy, and Bleadon is classified as an infill village.
13	Yatton Parish Council	-	The open green spaces identified in the emerging Yatton Neighbourhood Plan should be included in the Site Allocations Plan	The emerging Yatton Neighbourhood Plan proposes a number of Local Green Spaces in addition to locations already assessed through the Site Allocations Plan process. These additional locations will be assessed through the Neighbourhood Plan.

14	Gleeson		 The council have failed to plan for adequate housing provision Strategic Gaps (with particular reference to that between Nailsea and Backwell) are not supported by the NPPF as they are not an environmental designation. The inclusion of a Strategic Gap south of Nailsea in the SAP will hinder the JSP strategic development location. There is a lack of evidence to support the Strategic Gaps The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The principle of strategic gaps and their broad locations is adopted as part of the Core Strategy. The Joint Spatial Plan is outside the scope of this consultation. The specific site referred to has not been re-assessed as it is not subject to a pre-application or planning application. The Cite Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The principle of strategic gaps and their broad locations is adopted as part of the Core Strategy. The Joint Spatial Plan is outside the scope of this consultation. The specific site referred to has not been re-assessed as it is not subject to a pre-application or planning application.
15	Trustees of SSE	-	 The council have failed to identify sufficient sites A review of the Green Belt should have been undertaken Promotion of a specific site at Tower Farm, Portishead The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan must be in broad conformity with the Core Strategy, and as such no development is proposed in the Green Belt. The specific site referred to has not been re-assessed at this time given its Green Belt location.
16	St Modwen	-	 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 should not just reassess sites which are broadly consistent with the Core Strategy and in the development pipeline The council must not discount sites which are within the proposed Strategic Gaps The council must not discount omission sites which are not in the development The council's letter to the Inspector (CD2) sets out the council's proposed methodology for the further assessment work, and alternative calculations for the required uplift. The uplift is not intended to be an increase to the housing requirement, which is adopted in the Core Strategy. The Site Allocations Plan must be in broad conformity with the Core Strategy. To boost the five year supply, the new allocations must be deliverable, and as such sites that are not within the development pipeline have not been re-assessed, reflecting the developer view that it takes on average

				 pipeline if they are broadly consistent with the Core Strategy 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 still cannot demonstrate a five year land supply 5.5 years from submission of a planning application to seeing completions on site. The Inspector will assesses the evidence and conclude on the five year supply position.
17	Owner of 3 Main Road Cleeve	Nigel Bennett, Magenta Planning	-	 The council have failed to identify sufficient sites to address the Inspector's concerns The council should have assessed sites in and around infill villages Promotion of a specific site at Main Road, Cleeve The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan must be in broad conformity with the Core Strategy, as such development outside the boundary of an infill village is not supported.
18	Aston and Co		-	 Promotion of a specific site at Portishead within the Green Belt Amount of additional allocations identified is inadequate Other local authorities are releasing Green Belt sites, North Somerset should too The list of sites assessed is too narrow, and has been constrained by the requirement to only assess sites with a pre-app/planning application The council should publish an up to date proposals map showing all sites submitted The New Local Plan timetable has been delayed The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to be achieve the housing requirement. The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in
19	Blue Cedar Homes	Des Dunlop, D2 Planning	-	 Object to the lack of residential sites identified in Backwell Promotion of a specific site at Rushmoor Lane, Backwell The Core Strategy does not set specific housing targets for individual service villages. The site promoted has not been considered through the further site assessment process as it is not within the development pipeline, reflecting the developer view that it takes on average 5.5 years from

					submission of a planning application to seeing completions on site.
20	Strongvox Homes	Des Dunlop, D2 Planning	-	 Promotion of land at Butts Batch, Wrington 	The site promoted has not been considered through the further site assessment process as it is not within the development pipeline, reflecting the developer view that it takes on average 5.5 years from submission of a planning application to seeing completions on site.
21	Newland Homes	Daniel Sharp, Walsingham Planning		 The council have not undertaken the work required by the Inspector in her letter dated 26 June 2017 The council have decided to only assess sites within the 'development pipeline' Queries over deliverability of the sites selected for allocation at this stage Promotion of a specific site at William Daw Close, Banwell 	The council's letter to the Inspector (CD2) set out the council's proposed methodology for the further assessment work. The reason that only sites within the development pipeline have been assessed is to ensure short term supply, reflecting the developer view that it takes on average 5.5 years from submission of a planning application to seeing completions on site. The delivery trajectories for the new sites are based upon the developer/landowners own submissions. The site promoted at Banwell has not been through the further assessment process as there was no preapp or application for it.
22	Richards Developments	Daniel Sharp, Walsingham Planning	-	 The council have not undertaken the work required by the Inspector in her letter dated 26 June 2017 The council have decided to only assess sites within the 'development pipeline' Promotion of a specific site at Sousta Taverna, Congresbury 	The council's letter to the Inspector (CD2) set out the council's proposed methodology for the further assessment work. The reason that only sites within the development pipeline have been assessed is to ensure short term supply, reflecting the developer view that it takes on average 5.5 years from submission of a planning application to seeing completions on site. This site has not been further assessed as it is remote from the settlement boundary of Congresbury and therefore contrary to the Core Strategy framework
23	Progress Land (Sandford) Itd	Daniel Sharp, Walsingham Planning	-	 The council have not undertaken the work required by the Inspector in her letter dated 26 June 2017 	The council's letter to the Inspector (CD2) set out the council's proposed methodology for the further assessment work.

				 The council have decided to only assess sites within the 'development pipeline' Promotion of a specific site at Greenhill Road, Sandford The reason that only sites within the development pipeline have been assessed is to ensure short term supply, reflecting the developer view that it takes on average 5.5 years from submission of a planning application to seeing completions on site. This site has not been further assessed as it is located at an infill village and is therefore contrary to the Core Strategy framework.
24	Clevedon Town Council		MM36 MM71 MM76	 Land north of Churchill Avenue should remain as public open space Millcross site – in the event of the site not being needed for a hospital it should be used for affordable housing If Land West of Kenn Road is developed for housing rather than employment then at least 30% should be affordable housing Request that Brookfield Walk remains designated as a Local Green Space as Clevedon has a shortfall of green spaces Land north of Churchill Avenue remains a proposed allocation and is not subject to any modifications Millcross remains a proposed allocation and is not subject to any modifications Land West of Kenn Road remains a proposed allocation and is not subject to any modifications Land West of Kenn Road remains a proposed allocation and is not subject to any modifications Land West of Kenn Road remains a proposed allocation and is not subject to any modifications Land West of Kenn Road remains a proposed allocation and is not subject to any modifications Land West of Kenn Road remains a proposed allocation and is not subject to any modifications Land West of Kenn Road remains a proposed allocation and is not subject to any modifications Land West of Kenn Road remains a proposed allocation and is not subject to any modifications Land West of Kenn Road remains a proposed allocation and is not subject to any modifications Land West of Kenn Road remains a proposed allocation and is not subject to any modifications Land West of Kenn Road remains a proposed allocation and is not subject to any modifications Land West of Kenn Road remains a proposed employment site and is not subject to any modifications Land West of Kenn Road remains a proposed employment site and is not subject to any modifications Land West of Kenn Road remains a proposed employment site and is not subjec
25	South West Strategic Developments	Matthew Kendrick, Grassroots Planning	MM4	 The council have not tested sufficient capacity in response to the Inspector's letter Promotion of additional land adjacent to the proposed allocation at Oldmixon Road The council's letter to the Inspector (CD2) sets out the council's proposed methodology for the further assessment work, and alternative calculations for the required uplift. The proposed allocation boundary and capacity for the Oldmixon Road site is based on the current planning consent.
26	Tesco Stores Ltd	Simon Russell, Amethyst	-	 Concern that, following assessment, land at 173-175 Kenn Road Clevedon has not been selected for residential allocation Comments regarding the suitability and deliverability of the four sites in Clevedon that have been selected 173-175 Kenn Road was assessed, and the reasons for not taking the site forward are set out in our Executive Report from the 5th September. The suitability of the sites that are proposed within Clevedon was assessed through the further site assessment process, and is published on our website. The deliverability information is based on the

				trajectories provided by the developers and landowners.
27	St Congar Community Co- housing Ltd	Andrew Winstone, Walsingham Planning	 The council have not undertaken the work required by the Inspector in her letter dated 26 June 2017 Disagree with the council's conclusion that there is insufficient information to support a residential allocation for land off Station Road, Congresbury 	The council's letter to the Inspector (CD2) sets out the council's proposed methodology for the further assessment work, and alternative calculations for the required uplift. The Station Road Congresbury site is the subject of a current pre-application. At present there remain concerns regarding the impact of the proposals on heritage assets, and as such it is not appropriate to bring the site forward as a proposed allocation. If the issues can be overcome the scheme could be granted consent in future, without the need for an allocation.
28	Oliver Matthews		 Land at Rectory Farm, Yatton has been unlawfully emitted from the Site Allocations Plan evidence base The council have failed to follow the Inspector's request to test an additional 2,500 dwellings capacity The council's definition of those sites in the development pipeline is incorrect, sites without a pre-app/planning application submitted may be more sustainable than those that have been considered Yatton is a sustainable location for development Query whether the Youngwood Lane and Old Mill Road allocations are deliverable given their scale (450 and 350 respectively) Object to a number of the proposed allocations Promotion of specific site at Rectory Farm, Yatton 	This site was considered as part of the original site assessment work. It has not been re-assessed as there was no pre-application or application submitted at the time of the re-assessment work. The council's letter to the Inspector (CD2) sets out the council's proposed methodology for the further assessment work, and alternative calculations for the required uplift. The reason that only sites within the development pipeline have been assessed is to ensure short term supply, reflecting the developer view that it takes on average 5.5 years from submission of a planning application to seeing completions on site. The Core Strategy set the spatial hierarchy - that is outside the scope of this consultation. The Old Mill Road site is not proposed to be allocated for 350 dwellings, and whilst the developer submission for the Youngwood Lane scheme is for 450, the proposed allocation is for 170 dwellings. Rectory Farm has not been re-assessed, as no pre-app or planning application was before the council.

29	Mike Knight, South Bristol Business		-	 Support the increase in housing provision Support policies to increase business creation, although concerned whether there is sufficient land allocated for employment use Support welcomed. It is considered that the Site Allocations Plan makes sufficient provision for employment land. The requirements for land will be reviewed in the context of the emerging Joint Spatial Plan and adjusted through the new Local Plan. An Employment Land Review is being prepared to inform this process.
30	Redcliffe Homes	GL Hearn	AM35 MM8, MM9, MM12, MM17, MM18, MM19, MM20 MM25	 No objection to updated broad distribution of housing The council have failed to identify 2,500 dwellings as requested by the Inspector Adding only 821 additional dwellings will not deliver a five year supply Concern that the heritage assets at Birnbeck Pier (given the advice from Historic England) make it inappropriate to allocate the site for residential development Comments regarding specific sites proposed for allocation and their flood risk status or other potential constraints such as impact on heritage assets Support the principle of the proposed allocation at Cox's Green Wrington, but suggest that the capacity should be increased to 59 dwellings since the council withdrew their case at appeal for this scheme The proposed allocation at MM25 should not refer to a specific access point, the planning application includes two access points The modification requires the 'retention of hedgerows', however the planning application involves removal and translocation of hedgerows

31	Gallagher Estates	Simon Prescott, Barton Willmore	-	 There is no basis for the allocation to contain a specific requirement for open space Promotion of a specific site at Pill Green It is not sustainable to continue to use the Core Strategy framework to identify sites, the council should consider the strategic context being set by the Joint Spatial Plan The site promoted is within the Green Belt and is therefore contrary to the Core Strategy. The Site Allocations Plan must conform to the Core Strategy - the New Local Plan will be the document to deliver the Joint Spatial Plan growth.
32	Anchor	Jonathan Rainey, Pegasus	MM2	 Insufficient sites have been identified to provide the Inspector with certainty that the Core Strategy requirement will be delivered by 2026 and that a five year supply can be secured and maintained Land at Serbert Way, Gordano Gate is proposed to be retained as an employment allocation despite marketing evidence submitted in support of the site for housing Promotion of the Serbert Way employment allocation for residential development Support the principle of streamlining the three employment policies into one policy, however the wording of the new proposed employment policy is unsound The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan including the modifications now identifies 22,285 dwellings capacity in order to achieve the housing requirement. The Site Allocations Plan including the housing requirement. The Site Allocations Plan
33	Development Industry Consortium - Persimmon - Gladman - Redcliffe Homes - Rocke Associates - Taylor Wimpey - St Modwen - Gleeson Homes			 The Inspector was clear that the council must test up to 2,500 dwellings capacity, the council have not done this The council have fallen into a trap of only assessing sites that are in conformity with the Core Strategy. This has ruled out sites that are otherwise deliverable Strategic gap boundaries should have been revisited The council's letter to the Inspector (CD2) sets out the council's proposed methodology for the further assessment work, and alternative calculations for the required uplift. The Site Allocations Plan must conform to the Core Strategy. The reason that only sites within the development pipeline have been assessed is to ensure short term supply, reflecting the developer view that it takes on

				 The council have set an arbitrary cut off by only selecting sites with a pre-app or planning application, all omission sites should have been assessed Specific comments made on each proposed additional allocation, with a conclusion that only 14 of the 22 sites identified are deliverable within 5 years Even taking account of those sites now proposed to be allocated, the council cannot demonstrate a five year supply in accordance with the Sedgefield methodology and a 20% buffer The council's delivery rates assumed for Weston Villages are unachievable 	on site. In of the proposed jectories, is taken the developers and dence and conclude already made ding delivery rates rest of the district. difications
34	Edward Ware Homes	Alex Bullock, Pegasus	MM26	 The council should not have created a cutoff date for considering sites The amount of sites assessed is well below the Inspector's request to consider 2,500 dwellings The additional allocations are not sufficient in number to demonstrate a five year supply Disagree with the boundary the council propose for the Bristol Road Churchill site Promotion of an additional site south of Langford The additional site proposed methodology for assessment work, and alternative or required uplift. A cut-off date was required in order further site assessment work. The Inspector will assesses the eviction on the five year supply position. The boundary that the council have allocation allows for potential junction and carriageway widening that massupport the strategic growth proposition. The additional site proposed does pre-app or planning application an assessed as part of the further site. The decision to only assess sites with development pipeline was reflecting view that it takes on average 5.5 years submission of a planning application completions on site. 	or the further calculations for the er to progress the dence and conclude e proposed for the tion improvements y be needed to osed in the Joint not benefit from a d as such was not assessments work. Ithin the ng the developer ears from

35	Strongvox Homes	Alex Bullock, Pegasus	 The council should not have of date for considering sites The amount of sites assessed the Inspector's request to condwellings The additional allocations are sufficient in number to demonyear supply Promotion of land east of Brit Congresbury Promotion of land south of Washington Road, Banwell 	council's proposed methodology for the further assessment work, and alternative calculations for the required uplift. It was necessary to set a cut-off date, in order to progress the further site assessment work. The Inspector will assesses the evidence and conclude on the five year supply position. The site at Brinsea Road Congresbury is the subject of an appeal, with a hearing date set for November 2017.
36	Group West (Highridge)	Richard Walker, Pegasus	 Insufficient sites have been in secure a five year supply or e delivery of the overall Core Si requirement by 2026 Promotion of land in the Gree Highridge Green 	on the five year supply position. The Site Allocations Plan must be in broad conformity with the Core Strategy, and as such no development is
37	Persimmon Homes Severn Valley		 It is not appropriate that the revisited the calculation of th housing requirement. The council have not address that some of their existing su unlikely to come forward. Omission sites that are yet to a pre-app or planning applica been assessed. The interpretation of whethe accordance with the Core Stransparent. 	council's proposed methodology for the further assessment work, and alternative calculations for the required uplift. The decision to only assess sites within the development pipeline was reflecting the developer view that it takes on average 5.5 years from submission of a planning application to seeing completions on site. Sites are in

T		
AM27 AM31	 The Inspector recommended a collaborative approach but the council have not engaged with developer suggested sites. Promotion of the Farleigh Fields Backwell site Concern that employment led and playing field issues may constrain delivery at 	sites within infill village boundaries, or sites elsewhere that are wholly previously developed land. The site at Farleigh Fields, Backwell has not been reassessed, as it is at appeal - an inquiry has been held and a decision is expected by the end of November. Winterstoke Village is already delivering completions in line with the council's extant employment led
AM81 MM2	 Winterstoke Village The council will need to make a judgement regarding the loss of the playing pitch 	policy. Playing pitch issues on specific sites will be dealt with at planning application stage.
MM2	 The council will need to take a view on the loss of the sports pitches at Moor Road, Yatton, which is subject to an objection from Sport England Support the single policy approach Consider there is an issue about how criteria (i) to (iv) relate to each other, as the use of the word 'and' suggests that all criteria apply in all cases. This is different to previous policy E/5, which the new policy is largely derived from. The effect of the new wording could be to require a marketing exercise and report in all cases. This is unnecessary. Criterion (iv) is too wide. Criterion (iii) requires 'effective' marketing. It would be helpful if the supporting text could provide guidance on how the council would judge whether marketing is effective. The proposed modifications to the undesignated green space policy make substantial wording changes and demonstrate that the policy is actually unnecessary. The Core Strategy already 	Support for single employment policy noted. The Council consider the proposed criteria and the use of 'and' are necessary. The proposed modifications to policy SA8 on undesignated green space, including references to green infrastructure, are appropriate. While there is a policy in the Core Strategy on green infrastructure (CS9) that is a broad policy appropriate for the strategic plan, whereas policy SA8 is a detailed policy,

Further	affords such green spaces protection	setting out detailed criteria to be applied in assessing
modifications	under policy CS9.	development proposals affecting green spaces.
suggested	In Schedule 1 there are no formal	development proposals arreating green spaces.
Juggesteu	modifications for the following changes:	The schedule 1 modifications listed are adequately
		dealt with by AM20 'revisions to reflect updated
	- dates in headings	housing land supply information at April 2017 and
	- change in total for Weston-super-Mare	
	- change in numbers for Clevedon Hall	other minor consequential amendments'.
	- change in total for Clevedon	As the Weston Gateway site has been deleted from
	- change in total for West End, Nailsea	the employment schedule and added to the
	- change in total for Nailsea	employment schedule, this was considered a main
	- change in total for Portishead	modification, whereas the residential sites that have
	 new application number for The 	been deleted are as a consequence of the
	Chestnuts	development being built out – therefore these have
	 new application number for 	been treated as additional modifications.
	Woodborough Farm	The policies map changes have been treated in the
	- change in total for Arnolds Way	same way.
	 new application number for Pudding Pie 	AM86 deals with the change in total at Weston. The
	Lane	housing totals are covered by AM20.
	 deletion at Pudding Pie Lane east 	
	 change in total for service villages 	
	- change in total for Barrow Hospital	
	- change in total for other settlements	
	- change in grand total	
•	In Schedule 2:	
	- Weston Gateway is deleted through a	
	MM, residential site deletions are dealt	
	with as AMs	
	- There is no modification for change in	
	total at Weston-super-Mare	
	- The change in total employment land is	
	listed as an AM which is inconsistent with	
	the fact that the changes to housing totals	
	are not listed.	
	In Schedule 3:	
	- the deletion of a local green space at	
	•	
	Brookfield Walk is listed as an MM, which	

				 is contrary to what has been done in Schedule 1 In Schedule 4: deletions are listed as AMs rather than MMs Policy Map Changes are inconsistent – some are MMs and some are AMs 	
38	Yatton Rugby Football Club	Richard Walker, Pegasus	-	 Insufficient sites have been identified to secure a five year supply or ensure delivery of the overall Core Strategy requirement by 2026 Yatton Rugby Club land should be removed from the Green Belt and allocated for residential use 	The Inspector will assesses the evidence and conclude on the five year supply position. The Yatton Rugby Club site promoted is not in the Green Belt. As there was no pre-app or planning application for the site it has not been considered as part of the further site assessments work. The decision to only assess sites within the development pipeline was reflecting the developer view that it takes on average 5.5 years from submission of a planning application to seeing completions on site.
39	Crest Nicholson (South West) Ltd	Jonathan Coombs, Pegasus	-	 Promotion of a site at Pineapple Farm, Congresbury The council have fallen short of the Inspector's requirement to identify a further 2,500 dwellings to ensure that a five year supply can be maintained and the plan period requirement met in full 	The site promoted is not subject to a pre-app or planning application and as such was not considered through the further site assessment work. The decision to only assess sites within the development pipeline was reflecting the developer view that it takes on average 5.5 years from submission of a planning application to seeing completions on site. The council's letter to the Inspector (CD2) sets out the council's proposed methodology for the further assessment work, and alternative calculations for the required uplift.
40	Mr Hardwick and Mrs Cooksley	Alex Bullock, Pegasus		 Promotion of land in the Green Belt at Plummers Hill, Easton-in-Gordano The council should not have created a cutoff date for considering sites The amount of sites assessed is well below the Inspector's request to consider 2,500 dwellings 	The Site Allocations Plan must be in broad conformity with the Core Strategy, and as such no development is proposed in the Green Belt. A cut-off date was necessary in order to progress the further site assessment work. The council's letter to the Inspector (CD2) sets out the council's proposed methodology for the further

				 The additional allocations are not sufficient in number to demonstrate a five year supply assessment work, and alternative calculations for the required uplift. The Inspector will assesses the evidence and conclude on the five year supply position.
41	Newland Homes	Kate Holden, Pegasus		 The council should not have created a cutoff date for considering sites The amount of sites assessed is well below the Inspector's request to consider 2,500 dwellings The additional allocations are not sufficient in number to demonstrate a five year supply Promotion of site at Claverham Works, Bishops Road, Claverham A cut-off date was necessary in order to progress the further site assessment work. The council's letter to the Inspector (CD2) sets out the council's proposed methodology for the further assessment work, and alternative calculations for the required uplift. The Inspector will assesses the evidence and conclude on the five year supply position. The site at Claverham was not subject to a pre-app or planning application and as such was not assessed during the further site assessments work. The decision to only assess sites within the development pipeline was reflecting the developer view that it takes on average 5.5 years from submission of a planning application to seeing completions on site.
42	Mactaggart and Mickel Homes	Tom Rocke, Rocke Associates	MM14	 No evidence that the council has tested the potential of up to 2,500 additional dwellings and there has been no robust consideration and rejection of potential sites on environmental grounds The council's letter to the Inspector (CD2) sets out the council's proposed methodology for the further assessment work, and alternative calculations for the required uplift. Being in the development pipeline was not set as an individual criteria, sites also had to be in conformity with the Core Strategy framework to be assessed. The next steps for the examination are a matter for the Inspector, not the council. Support for the principle of the allocation noted. The justification for the reduced area being allocated (when compared to the planning application boundary) is set out in the council's assessment of the site, which is available on our website.

Welcome the site specific notes relating to Youngwood Lane in relation to ecological issues, and request these are also included on the Engine Lane and North West Nailsea sites Request wording amendment to the Birnbeck Pier site specific notes, whilst the inclusion of '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' is welcome, the whole site is adjacent to the Severn Estuary and the need to take account of this should apply to development on the whole site, not just the island Moor Park (North Somerset) Ltd Park (North Somerset) Ltd Moor Park (North Somerset) Ltd Moor Park (North Somerset) Ltd Park (North Somerset) Ltd Moor Park (North Somerset) Ltd Park (North Somerset) Ltd Park (North Somerset) Ltd Park (North Somerset) Ltd Moor Park (North Somerset) Ltd Moor Park (North Somerset) Ltd Park (North Somerse				dwelling scheme proposed by the landowners would prejudice future strategic development	
Somerset) Ltd Rocke Associates the potential of up to 2,500 additional dwellings and there has been no robust consideration and rejection of potential sites on environmental grounds The council has failed to properly assess all potential sites in the development pipeline, the process for selecting/rejecting sites has been arbitrary and lacking in transparency Concern regarding specific omission site at Laney's Drove, which was originally listed on the council's sites in to 2,500 additional assessment work, and alternative calculated assessm	43 Natural England		-	 Welcome the site specific notes relating to Youngwood Lane in relation to ecological issues, and request these are also included on the Engine Lane and North West Nailsea sites Request wording amendment to the Birnbeck Pier site specific notes, whilst the inclusion of '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' is welcome, the whole site is adjacent to the Severn Estuary and the need to take account of this should apply to development on the whole site, not just 	The council would have no objection to these changes.
documents CD2 and CD2a. MM38	•	Rocke	MM38	 the potential of up to 2,500 additional dwellings and there has been no robust consideration and rejection of potential sites on environmental grounds The council has failed to properly assess all potential sites in the development pipeline, the process for selecting/rejecting sites has been arbitrary and lacking in transparency Concern regarding specific omission site at Laney's Drove, which was originally listed 	Being in the development pipeline was not set as an individual criteria, sites also had to be in conformity with the Core Strategy framework to be assessed. During the examination hearings the Inspector stated that she would be looking for the council to identify additional sites. At this point a draft list of sites was submitted to the examination to illustrate the scale of potential supply. This was subsequently refined, and a final version of sites to be assessed was published alongside the council's letter back to the Inspector,

			MM2	 Request for the council to hold further examination sessions to investigate the merits of the omission sites Object to the extension of the Weston/Locking Strategic Gap Justification for this gap as has not been made Strategic gaps should have been reviewed as part of the council's work to find additional housing supply Welcome the consolidation of policies SA4, 5 and 6 into a single policy Concerns that the single policy is too restrictive as currently worded, and the use of 'and' between criteria should be replaced with 'or' 	The next steps for the examination are a matter for the Inspector, not the council. Strategic gaps were only reviewed relatively recently, in 2016, as documented in the Strategic Gaps Background Paper October 2016 published in support of the Publication Plan. While that document did not identify a need to amend the strategic gap between Weston super Mare, Locking and Parklands Village, it was subsequently considered that the southern extension of the strategic gap was appropriate, particularly having regard to the functions of strategic gaps and to paragraph 5.7 of the Background Paper. Support for single policy on employment noted. The Council consider the criteria and the use of 'and' are necessary.
45	Strongvox Homes Ltd	Faith Wright, Barton Willmore	MM9	 Support the inclusion of land at Wilson Gardens/Scot Elm Drive as a residential allocation In the context of the Joint Spatial Plan there is a strong case for new development across North Somerset, not only isolated to the 22 sites identified at this stage 	Support noted. The Site Allocations Plan needs to deliver the Core Strategy housing requirement, and currently (including the modifications) identifies 22,285 dwellings capacity. The New Local Plan will identify sufficient sites to deliver the Joint Spatial Plan requirements.
46	Hayes Family	Matthew Kendrick, Grass Roots Planning	-	 Promotion of land west of the M5, Locking for residential allocation Reference to the DCLG consultation on a new methodology for assessing housing need and the requirement for North Somerset to deliver 1,305 dwellings per annum Provision of an additional 821 dwellings is not sufficient to demonstrate a five year land supply The sites that the council has chosen, and their site assessments, lack credibility 	Land west of the M5 was assessed as part of the further assessments work, but discounted. The full site assessment is available to view on the website. The new DCLG proposed methodology (which is only a consultation at this stage) does not apply to the Site Allocations Plan, which is seeking to deliver the adopted Core Strategy housing requirement. The Inspector will assesses the evidence and conclude on the five year supply position. The site assessment methodology was set out in the council's response to the Inspector (CD2) and all

				 Comments on individual proposed allocations, their suitability and deliverability 	assessments have been published in full on our website. The deliverability information and trajectories for the sites proposed to be allocated are taken from the landowner and developer submissions.
47	Taylor Wimpey	Jeff Richards, Turley		 Promotion of site at Stowey Road, Yatton Object to the council challenging the quantum of housing required by the Inspector The council are wrong to have excluded sites simply because they are not in the development pipeline The council have not worked with the development industry as requested The council cannot demonstrate a five year supply, even with the new sites, if a 20% buffer is required Request additional hearing sessions 	The site at Stowey Road Yatton is the subject of an appeal and the Inspector's decision is awaited. The council's letter to the Inspector (CD2) sets out the council's proposed methodology for the further assessment work, and alternative calculations for the required uplift. The decision to only assess sites within the development pipeline was reflecting the developer view that it takes on average 5.5 years from submission of a planning application to seeing completions on site. The development industry commented on the methodology and supplied trajectory information. The Inspector will assesses the evidence and conclude on the five year supply position. The next steps for the examination are a matter for the Inspector, not the council.
48	The Church Commissioners for England	Josh Coldicott, Deloitte	-	 Promotion of a site at The Veale, Bleadon Broadly support the Site Allocations Plan, however consider that land at The Veale should be included as an allocation 	Support for the plan welcomed. The site at The Veale, Bleadon is located outside of an infill village, in the countryside.
49	Wrington Parish Council			 Support the policy context and protection of the Green Belt Cannot locate the relevant sustainability appraisal and concerned that there is no HRA Support the principle of settlement boundaries but request amendments to policy to ensure that development is only permitted within settlement boundaries 	Support welcomed. The Sustainability Appraisal and HRA are available on the council's website. Core Strategy Policy CS32 permits development of a certain scale (subject to criteria) outside of settlement boundaries. This remains the adopted policy context. The Mike Bush Paddock site has been previously assessed and is not considered appropriate for LGS designation, as indicated in the Background Paper on

				 Support the Local Green Space policy but request two additional sites: The Mike Bush Paddock, Wrington Hill Glebe Field extension The Glebe Field extension was also assessed and the council considered that it would be appropriate for a 0.04 area to be added to the 0.3ha proposed Local Green Space (LGS) area called "Glebe Field" (grass space, including a play area), off Church Walk, Wrington, which was in the submitted Plan. This proposal, which would result in a proposed LGS area of 0.34ha, was included in the council's Hearing Statement CS/12 for the Examination into the Plan.
50	Highways England		-	 On balance, the additional growth identified does not change the original view that the impacts of the proposed allocations, when the identified transport schemes are in place, do not constitute a severe impact on the SRN
51	Nailsea Holdings LVA LLP	lan Jewson, Walsingham Planning	AM105	 Welcome removal of land north of Greenfield Crescent and Woodland Road, Nailsea as proposed Strategic Open Space The council should not have excluded sites where a pre-app or application was not before them by 18th May 2017 The council should not have excluded sites that do not fully comply with the Core Strategy framework Noted. A cut-off date was necessary in order to progress the further site assessment work. The Site Allocations Plan must be in broad conformity with the Core Strategy.
52	Mead Realisations	lan Jewson, Walsingham Planning		 The council should not have excluded sites where a pre-app or application was not before them by 18th May 2017 The council should not have excluded sites that do not fully comply with the Core Strategy framework Promotion of four additional sites at: Land off Ebdon Road Land at Lynchmead Farm A cut-off date was necessary in order to progress the further site assessment work. The Site Allocations Plan must be in broad conformity with the Core Strategy. The four additional sites promoted have not been part of the further assessment process as they are not in the development pipeline.

				Land at Manor Farm, Collum LaneLand at Home Farm, Kewstoke	
53	Environment Agency		-	No further comments	Noted.
54	Keith		-	 Comments on the development of Weston-super-Mare, regarding dedicated cycle routes 	Not within the scope of the modifications consultation. The adopted Sites and Policies Plan Part 1 safeguards numerous cycle routes around the town.
55	Rowland Richardson		-	 The Site Allocations Plan only considers the housing numbers set by the government, and it does not consider planning holistically – urban planning, impact on infrastructure and forward planning must be considered 	The Site Allocations Plan must identify sufficient housing to deliver the Core Strategy requirement. The Site Allocations Plan is part of a suite of documents that make up the development plan, and should not be taken in isolation.
56	David		AM47 AM48	 As well as maintenance access to watercourses, pedestrian access should be provided/maintained so that there is a green walkway through the town of Clevedon 	Pedestrian access within specific sites is a matter to be dealt with at planning application stage.
57	Sutherland Property and Legal Services		AM96	 Object to the retention of the land in Kewstoke for a new school site as the land is in private ownership 	The council has a statutory duty to secure sufficient school places. Due to the limitations of the current Kewstoke School site retaining a site for a new school is necessary, so that as and when funding is available the school can relocate.
58	Bleadon Parish Council		AM103 MM75	 Object to the deletion of the land west of Bridge Road, Bleadon for proposed strategic open space 	The council cannot justify the retention of this site as there are no proposals or funding available to deliver a scheme.
59	Linden Homes	Lauren Taljaard, Barton Willmore	AM57 AM59 AM60 AM61	 Support the allocation Support the modification to the wording regarding possibility of a new school Object to the additional wording regarding surface water attenuation, run off and water quality as it is too vague, and specific reference should be made to the West of England Sustainable Drainage Developer Guide Section 1 (March 2015) 	Support welcomed. The wording in relation to water attenuation, run off and water quality has been agreed with the Environment Agency. The council do not consider it would be appropriate to refer to specific guidance, which may be subject to change.

60	Yatton Parish Council	AM69 AM81	 Pleased to see the amendments to the site specific criteria for the Yatton Station allocation Strongly of the view that there should be absolutely no eventuality where an access road across the Orchard is allowed at the Moor Road allocation Noted. Whilst it is preferable that the access road does not go through the orchard, It is the council's position that if it can only be delivered that way, then Natural England must be in agreement.
61	Rob Turvey	AM35 MM14 MM54 MM55	 Any properties constructed on the Uplands Public Open Space should be of similar structure and design to those that the land currently borders. Youngwood Lane site should not be allocated, as the highway network is unsatisfactory. If it is to be allocated, then the Uplands site should be removed. The adopted Core Strategy and Sites and Policies Plan Part 1: Development Management Policies contains policies regarding design and placemaking. Subject to satisfactory mitigation, the level of growth currently planned for Nailsea can be accommodated.
62	S. Lyon	MM3 MM14	 The re-worded policy SA8: Undesignated Green Space applies favourably to land at The Uplands, Nailsea Opposed to the development of Youngwood Lane, Nailsea as the road network is inadequate The Undesignated Green Space policy will not apply to sites that are allocated for development. Highways officers are satisfied that the level of growth currently planned for Nailsea can be accommodated.
63	Sport England	AM41	The proposed Bournville School Selworthy Road site allocated for housing is a playing field, as it contains a playing pitch as shown in past aerial images and therefore must meet one of the five exceptions set out in Sport England Policy If replacement sports provision is required, this will be dealt with at planning application stage.
64	Ellandi LLP	MM13	 Ellandi support the inclusion of the Weston College, Somerset Square Nailsea site as an allocation, but object to the ground floor uses being specified as A1 or A3 uses only The specific uses listed in the notes column of the application are those set out in the planning application.
65	CP30	MM14	 Development south of Nailsea within the boundary of Youngwood Lane is a sensible option, the only obvious problem is road infrastructure which would need updating The level of growth proposed at this stage can be accommodated as long as reasonable mitigation is provided by developers. Further development south of

					Nailsea (as currently proposed in the Joint Spatial Plan) will require significant infrastructure improvements.
66	Nailsea Town Council		MM14	 Object to 170 homes at Youngwood Lane Nailsea, as this is contrary to the Town Council's policy. 	Noted.
67	Richard Lewis		MM14	 If Youngwood Lane is to be added then The Uplands should be removed. 	The council are proposing both sites as allocations.
68	Nailsea Action Group		MM14	 Believe that Youngwood Lane should not be added as an allocation, but if it is, then the Uplands site should be removed as the status of this land is contested 	The council are proposing both sites as allocations.
69	Network Rail		MM14	The Youngwood Lane proposed allocation is near to Grants Mill level crossing. Any development that would result in a material increase or significant change in the character of traffic should be refused unless it can be demonstrated that safety will not be compromised.	This will be considered through the planning application if necessary.
70	Angela Love		MM14	 Believe that Youngwood Lane should not be included as an additional allocation, however if it is included then The Uplands site should be removed. 	The council are proposing both sites as allocations.
71	HHGL (Homebase and Bunnings)	G R Planning	MM16	 Support the changes to the Old Mill Road allocation Given that Standard Life (site owners) have confirmed that the existing Wyndham Way Retail Park will be retained as is, request that the boundary is amended to reflect this 	Support noted. The boundary reflects the extent of the developers land ownership.
72	The Hughes Family		MM16	 Object to the allocation on the basis of loss of employment With more houses, additional cars would inevitably follow 	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity. A transport assessment would be required with any planning application.

73	Dr Andrew Morrison	MM16	Object to the allocation on the basis of loss of employment and increased traffic	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity. A transport assessment would be required with any planning application.
74	M Dilloway	MM16	Object to the plans to redevelop Old Mill Road	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity.
75	Jones	MM16	 Object to the plans to redevelop Old Mill Road Portishead does not have infrastructure in place to cope with additional housing 	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity. A transport assessment would be required with any planning application.
76	Michael Parker	MM16	 Old Mill Road could provide a vibrant link between the High Street and Railway Station/Marina, but not at the cost of the existing businesses 	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity.
77	Sarah Mattison	MM16	Support saving Old Mill Road, do not want to see housing on the site	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity. The allocation is currently proposed for a mix of employment, retail, leisure, cafes, bars, restaurants and some residential.
78	Derek DeVote	MM16	Do not support the allocation of the site for 350 houses and large retail units	The allocation is currently proposed for a mix of employment, retail, leisure, cafes, bars, restaurants and some residential.
79	Colin Hughes	MM16	Object to allocating housing on the Old Mill Road site	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity. The allocation is currently proposed for a mix of

				employment, retail, leisure, cafes, bars, restaurants and some residential.
80	Michael Selby	MM16	Object to allocating Old Mill Road for retail and 300 houses	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity. The allocation is currently proposed for a mix of employment, retail, leisure, cafes, bars, restaurants and some residential.
81	Patrick Gardner	MM16	 Object to this employment site being allocated for low paid unskilled occupations such as retail, leisure cafes and bars. Object to the promotion of the site for 350 dwellings 	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity. The allocation is currently proposed for a mix of employment, retail, leisure, cafes, bars, restaurants and some residential.
82	Claire Cleeves	MM16	Continue to object to the allocation of the Old Mill Road site for mixed use development including residential.	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity. The allocation is currently proposed for a mix of employment, retail, leisure, cafes, bars, restaurants and some residential.
83	Ferenc Vamosi	MM16	 In spite of the claims of the developers there will be no cinema or retail units so the whole area will be turned into residential 	The allocation is currently proposed for a mix of employment, retail, leisure, cafes, bars, restaurants and some residential. The allocation is currently proposed for a mix of employment, retail, leisure, cafes, bars, restaurants and some residential.
84	Steve Gillingham	MM16	 Object to the redevelopment of Old Mill Road and the loss of the existing jobs on site 	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity.
85	Ryan Peake	MM16	Object to the proposed redevelopment of Old Mill Road	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity.

86	Ali Price	MM16	Object to the increase in housing proposed at Old Mill Road	The allocation is currently proposed for a mix of employment, retail, leisure, cafes, bars, restaurants and some residential.
87	Andy Cleeves	MM16	Object to the allocation of Old Mill Road for mixed use development	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity.
88	T Fowler	MM16	Object to the allocation of Old Mill Road for redevelopment	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity.
89	G Kirton	MM16	Object to the proposal for more houses and flats on the site, displacing existing businesses	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity. The allocation is currently proposed for a mix of employment, retail, leisure, cafes, bars, restaurants and some residential.
90	Ryan's Garage	MM16	Object to the Old Mill Road redevelopment proposals, at the cost of existing businesses	The modifications as currently drafted seek to ensure that existing businesses will be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity.
91	Standard Life Investments	MM16	 The council have not identified sufficient additional allocations to meet the Inspector's requirements The new allocations are not sufficient to demonstrate a five year land supply Promotion of the Old Mill Road site for 350 dwellings Changing the wording of the site specific notes from 'small amount of residential' to 'some residential' does not reflect the site's potential. The schedule should not list the dwelling capacity as 0. There is no evidence to justify the council's requirement for the 'need' to 	The council's letter to the Inspector (CD2) sets out the council's proposed methodology for the further assessment work, and alternative calculations for the required uplift. The Inspector will assesses the evidence and conclude on the five year supply position. It is unclear at this stage what level of residential the scheme may be able to accommodate. The modifications as currently drafted seek to ensure that existing businesses will either be relocated or incorporated into the redevelopment, and that overall there is no net loss of employment capacity.

				accommodate the existing businesses within the site
92	Jones		MM17	 Object to the proposed allocation at Harbour Road/Gordano Gate, as Portishead cannot cope with any more housing developments Noted, although the site now benefits from planning consent (subject to a legal agreement).
93	Ellandi LLP		MM2	 Policy SA4 requires additional text to make it clear that any alternative proposals for retail uses will be subject to sequential and impact tests. At present the Site Allocations Plan is silent on the application of sequential and impact tests for town centre uses. Development Management Policies DM66 and DM67 cover sequential and impact tests for town centre uses. Given that the development plan applies as a whole, it is not necessary to repeat the content of these policies in SA4.
94	McCarthy and Stone Retirement Lifestyles Ltd		MM2	 The removal of schedule 3 and the more positive re-wording of SA4 is welcomed, however the policy should acknowledge that many good employment uses fall outside of the B1-B8 employment sectors. Request further consideration is given to criteria (iii) of the policy, as some sites may have a former/existing B use that could provide wider social, health and economic benefits without requiring retention of a B use. Promotion of land at 173-175 Kenn Road Clevedon for an extra care residential supported living use, which would also provide jobs. This policy is specifically intended to safeguard employment within the B use classes. Other policies support the delivery of employment from non B uses. The site has been considered through the further site assessments work, but is not proposed to be allocated for a residential use.
95	Tesco Stores Ltd	Simon Russell, Amethyst	MM2	 Whilst it is welcomed that the schedule of protected employment sites has been removed, it is of some concern that the council continues to not recognise the merits of non B use classes This policy is specifically intended to safeguard employment within the B use classes.
96	Wrington Parish Council		MM2	 Whilst the Havyatt Business Park allocation may not be a proposed change, The land referred to is not subject to any proposed modifications. It is a residual part of the site that has been carried forward from the replacement local plan.

			it is difficult to see how any extension to the existing operations could be justified	
97	Standard Life Investments	MM2	 The re-drafted policy conflicts with the sentiment of the Core Strategy Criteria (i) of the new policy cannot be satisfied unless existing employment areas are specifically defined. Compliance with it is unachievable as the loss of an existing B use would by definition harm the range of land and premises available for business use. Criterion (iii) includes the term 'incompatible development' but does not define incompatible The criteria should apply individually, rather than collectively Core Strategy Policy CS21 requires that retail centres be defined by the Sites and Policies DPD Policy DM60 says proposals for main town 	Policy CS20 of the Core Strategy seeks to provide new B use class employment sites. Policy SA4 supports this. The proposed approach to existing sites is similar to that already in force through existing policy. It is not considered that existing sites need to be defined. A key policy focus is in safeguarding a supply of the most suitable sites – the reference to 'range' is intended to ensure that a variety of sites are available. Reference to incompatible development could be explained in supporting text or in guidance to support the policy approach. It is considered that this may be a site specific issues that is best addressed on a site by site basis. Part 1 of the Sites and Policies Plan: Development Management Policies defines the retail boundaries Specific allocations can also occur within the town centres There is no reason why sites falling within the defined town centres cannot be allocated for specific uses.
98	Yatton Parish Council	MM21	Concern regarding access to the proposed allocation at Land south of Cadbury	Concern acknowledged. This has been dealt with through the planning application, which has now been granted subject to a legal agreement.
99	G C J Ballard	MM22 MM23	 Request that the council and Inspector are aware of previously dismissed appeals on the sites at Coombe Farm and Shipham Lane 	The council are aware of the previous appeals, however the planning context has changed and the sites have now been reconsidered.
100	Cresten Boase	MM22 MM23 MM24 MM26	 Part of the Shipham Lane allocation encroaches into the AONB The cumulative effect of traffic and other environmental factors must be considered There is no evidence that building in the countryside is necessary, or that there is 	Whilst the developer's original submission extended into the AONB the boundary of the allocation has been drawn so as not to encroach into it. Where potential cumulative effects are identified, these will be addressed through the assessment of detailed development proposals.

			no land of lesser environmental value that could be built on The council should prioritise the use of brownfield land and sites near employment and transport links	The additional sites identified are in conformity with the Core Strategy. Utilising brownfield sites remains a priority for the council.
101	S Stockwell	MM22 MM23 MM24 MM26 MM27 MM29	 The proposed allocations in Winscombe, Sandford and Churchill are not sustainable as no new infrastructure is proposed, with particular reference to roads and schools The council should be forcing developers to build the houses they already have permission for The Broadleaze Farm site is in conflict with the Core Strategy as it does not maintain the strategic gap between Winscombe and Sandford The proposal is in breach of Core Strategy Policy CS32 as it is outside the settlement boundary and for more than 25 dwellings Reference to various other development management policies 	Highways and education officers are satisfied that with appropriate mitigation, the level of additional growth proposed through the modifications can be accommodated. There is no defined strategic gap between WInscombe and Sandford. As the Broadleaze Farm site is adjacent to the settlement boundary of a service village it is in conformity with the Core Strategy spatial hierarchy.
102	Mendip Hills AONB unit	MM22 MM23 MM24 MM29 MM26	 Concern that the site at Shipham Lane is partly within the AONB Along with the recently allowed appeal at Sandford, when taken with the sites at Shipham Lane, Coombe Farm, Broadleaze Farm, Station Road Sandford and Bristol Road Churchill there are now 301 dwellings proposed on the northern edge of the AONB. Whilst the council have noted that there are potential adverse impacts from developing these sites, there is no analysis of specific impacts on the special qualities and landscape characteristics of this national designation. 	Whilst the developer's original submission extends into the AONB, the proposed allocation boundary does not. The site specific details for each of the sites mentioned include a reference to the AONB. Any potential adverse impacts will be dealt with on a case by case basis at planning application stage.

103	Robert Court	MM23	 Object to the inclusion of Broadleaze Farm as it is not a sustainable site Reference to other proposed allocations and potential cumulative impacts 	As the Broadleaze Farm site is adjacent to the settlement boundary of a service village it is in conformity with the Core Strategy spatial hierarchy.
104	E Gibbs	MM25	Object to the proposed allocation at Cox's Green on the grounds that Wrington is not a sustainable settlement Particular reference to - lack of public transport - flooding - pedestrian safety - lack of local services - limited school places	Wrington is defined as a service village by the adopted Core Strategy spatial hierarchy. The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website. Any site specific mitigations will be dealt with at planning application stage.
105	Tony Harden	MM25 MM62	 Object to the proposed allocation at Cox's Green on the grounds that Wrington is not a sustainable settlement Specific reference to flood risk of the site 	Wrington is defined as a service village by the adopted Core Strategy spatial hierarchy. The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website. Any site specific mitigations will be dealt with at planning application stage.
106	DP	MM25	 Object to the proposed allocation at Cox's Green on the grounds that Wrington is not a sustainable settlement Specific reference to flood risk of the site 	Wrington is defined as a service village by the adopted Core Strategy spatial hierarchy. The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website. Any site specific mitigations will be dealt with at planning application stage.
107	Wrington resident	MM25	 Object to the proposed allocation at Cox's Green on the grounds that Wrington is not a sustainable settlement Specific reference to flood risk of the site 	Wrington is defined as a service village by the adopted Core Strategy spatial hierarchy. The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website. Any site specific mitigations will be dealt with at planning application stage.

108	B Febrey	MM25	 Object to the proposed allocation at Cox's Green on the grounds that Wrington is not a sustainable settlement Specific reference to flood risk of the site 	Wrington is defined as a service village by the adopted Core Strategy spatial hierarchy. The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website. Any site specific mitigations will be dealt with at planning application stage.
109	M Fry	MM25	 Object to the proposed allocation at Cox's Green on the grounds that Wrington is not a sustainable settlement 	Wrington is defined as a service village by the adopted Core Strategy spatial hierarchy. The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website.
110	Steve Hogg	MM25	 Object to the proposed allocation at Cox's Green on the basis of lack of school places and risk of flooding 	Education officers consider that the development can be accommodated and any contributions to education that are required will be secured through a legal agreement. Any site specific mitigations will be dealt with at planning application stage.
111	Katrina Russell	MM25	 Object to the proposed allocation at Cox's Green on: flood risk grounds landscape impact ecological value of the site transport and highway safety agricultural land value compatibility with surrounding uses General comments regarding the sustainability of the village of Wrington 	Wrington is defined as a service village by the adopted Core Strategy spatial hierarchy. The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website. Any site specific mitigations will be dealt with at planning application stage.
112	Wrington Village Alliance	MM25	 Objection to the proposed allocation at Cox's Green, including copies of recent appeal closing submissions Particular reference to the following topics: impact on nearby safeguarded employment site flood risk 	Wrington is defined as a service village by the adopted Core Strategy spatial hierarchy. The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website. Any site specific mitigations will be dealt with at planning application stage.

			 landscape impact ecological issues transport, highways and access agricultural land value site character Comments on the sustainability of Wrington village 	
113	Sally Bartlett	MM25	Object to the proposed allocation at Cox's Green	Wrington is defined as a service village by the adopted Core Strategy spatial hierarchy. The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website.
114	AJH	MM25 MM62	 The council have not identified or quantified the environmental cost of the proposed allocation Comments on the sustainability of Wrington village Specific comments in relation to flood risk 	Wrington is defined as a service village by the adopted Core Strategy spatial hierarchy. The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website. Any site specific mitigations will be dealt with at planning application stage.
115	Rod T	MM25	 Object to the proposed allocation at Cox's Green potential highway impact and pedestrian safety flood risk risk of impact on Burnett Industrial Estate 	The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website. Any site specific mitigations will be dealt with at planning application stage.
116	Steve	MM25	 Object to the proposed allocation at Cox's Green on the grounds of flood risk and transport 	The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website. Any site specific mitigations will be dealt with at planning application stage.
117	AG	MM25	 Object to the proposed allocation at Cox's Green on the grounds of flood risk, access and transport and lack of infrastructure 	The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website.

118	Dr and Mrs Denny	MM25	Object to the proposed allocation at Cox's Green on the grounds of flood risk and transport	Any site specific mitigations will be dealt with at planning application stage. The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website. Any site specific mitigations will be dealt with at planning application stage.
119	Richard Thorn	MM25	Object to the proposed allocation at Cox's Green on the grounds of flood risk, lack of school places and transport	The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website. Any site specific mitigations will be dealt with at planning application stage.
120	Wrington Parish Council	MM25	 Object to the proposed allocation at Cox's Green with particular reference to: site is adjacent to the Green Belt boundary impact on openness of Green Belt unsustainability flooding pedestrian safety 	The site has been considered through the further site assessments work, a copy of the assessment is available on the council's website. Any site specific mitigations will be dealt with at planning application stage.
121	Churchill Parish Council	MM26	Object to the proposed allocation at land south of Bristol Road on the grounds that: - this is an unsustainable location impact on AONB - conflict with CS32 - landscape impact - loss of best and most versatile land - highways impact - prejudicing future JSP strategic road improvements - flooding and drainage - schooling - contrary to parish plan - cumulative impact when considered with other sites	Churchill is defined as a service village by the adopted Core Strategy spatial hierarchy. As the site is adjacent to the settlement boundary of a service village it is in conformity with the Core Strategy. The boundary of the site proposed has been reduced by the council, to ensure that the scheme will not prejudice any future highways improvements that are necessary in this location to support the proposed strategic growth around Churchill. Any site specific mitigations will be dealt with at planning application stage.

			 Comments in relation to the classification of Churchill as a service village 	
122	David	MM3	The undesignated green space policy should require a detailed wildlife assessment to be carried out where green spaces are developed	Adopted Policy DM8 of the Sites and Policies Plan Part 1: Development Management Policies requires ecological survey assessments where development proposals may cause adverse impact.
123	Richard Lewis	MM3	 If green space is important then the land south of The Uplands should not be considered for development 	The Undesignated Green Space policy will not apply to sites that are allocated for development.
124	Rob Turvey	MM3	 Object to the proposed residential allocation at The Uplands on the grounds that the undesignated green space policy should apply 	The Undesignated Green Space policy will not apply to sites that are allocated for development.
125	Sport England	MM3	Require clarification that playing pitches do not form undesignated green space	Adopted Policy DM68 of the Sites and Policies Plan Part 1: Development Management Policies affords protection to playing pitches and other sporting, cultural and community facilities, not the Undesignated Green Space policy.
126	Somerset County Council	MM3	 The location of undesignated green spaces could be close to commercial land and as such noise sensitive housing development that is acceptable under SA8 could have a constricting influence on commercial land uses 	Policy SA8 does not permit housing development.
127	Gladman Developments Ltd	MM38	 The Inspector directed the council to identify additional 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 the Strategic Gap. Strategic gaps are not supported by the NPPF The matter of strategic gaps was not fully explored at the hearing sessions once it became apparent that additional housing sites were required 	The Inspector did not specifically require the council to seek development opportunities within strategic gaps. The concept of strategic gaps, the policy context and their broad locations is set by the adopted Core Strategy Policy CS19. Strategic gaps were only reviewed relatively recently, in 2016, as documented in the Strategic Gaps Background Paper October 2016 published in support of the Publication Plan. While that document did not identify a need to amend the strategic gap between Weston super Mare, Locking and Parklands Village, it

			 It is unclear why the council have now amended the boundary of the Weston-super-Mare/Locking gap Comments on a planning application at Elm Grove Nursery, Locking It is not necessary to include strategic gaps around service and infill villages, as Core Strategy Policies CS32 and CS33 provide protection to settlements 	was subsequently considered that the southern extension of the strategic gap was appropriate, particularly having regard to the functions of strategic gaps and to paragraph 5.7 of the Background Paper. Policy CS32 is a permissive policy that allows development outside the settlement boundaries subject to certain criteria. Strategic gaps are needed having regard to adopted policy CS19, to help retain the separate identity, character and/or landscape setting of settlements and distinct parts of settlements.
128	Diane	MM54	 The proposed development at Youngwood Lane Nailsea is inconsistent with maintaining a strategic gap between Nailsea and Backwell 	The proposed allocation and proposed strategic gap boundaries do not conflict with one another.
129	Wrington Parish Council	MM79 AM107	 Object to the Land south of Rickyard Road, Wrington being deleted as a proposed strategic open space 	The land is in private ownership, and there is no proposal or funding for a scheme on this site. As such, the council cannot justify retaining the proposed designation.