

## North Somerset Local Plan Pre-commencement Document Consultation Responses

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
Brigly			<p>Under the heading Housing Requirement it is stated: The overall housing requirement to be accommodated in North Somerset using the standard method as the starting point. What does this mean? Is the council duty bound to allow developers to build more executive homes so that companies like Persimmons get their reward for huge donations to the Tory Party?</p> <p>Or can the council encourage housing that is really needed?</p>	
ALAN SHAW	Mr		<p>The scope of the consultation seems to be comprehensive as required however I think that as this has the potential to influence the development of NS for many years to come there should be clear commitment to both consultation and reporting to the wider community ( many of whom may not be involved in this consultation) and to this end full use should be made of the press and of regional meetings where the impact of change will be felt the hardest.</p>	
Di Hassan			<p>I hope that the local plan will look at redrawing settlement boundaries to allow for recent developments and that the ruling will be established that NO developements will be allowed outside of the settlement boundary.</p>	
Vic Slater			<p>1. Point 10 of the Pre-commencement Document states that "The overall housing requirement to be accommodated in North Somerset using the standard method as the starting point."</p>	

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			<p>Has the starting point referred to been adjusted since the original calculations to take account of BREXIT. If it hasn't, it should be, as the demand for housing will now be considerably reduced with less Europeans wanting to live in the UK. This matter should be referred back up to central government if it can't be addressed locally.</p> <p>2. Why are there so many 4 and 5 bedroom houses being built on new developments when the housing demand is more focused on 1,2 and 3 bedrooms? If this is a matter of profitability, why doesn't the Council consider creating it's own Building force, as in the 50's. This would not reduce employment , as the same number of construction staff would be needed and it would also allow the correct sizes accommodation needs to be fulfilled, probably at more competitive prices.</p> <p>3. I have heard of instances whereby developers have requested that the 10% figure placed on larger developments for affordable homes, is reduced as their profitability is suffering! Is this fair?</p> <p>4. Why are developers allowed to defer building once they have received planning permission. I feel a time period of say 12 month maximum should be allowed and if within this time period, if site work had not commenced, planning should be withdrawn. A period to allow for completion should also be included to defer a developer from starting a project and then deferring it.</p> <p>5. Point 12 of the report makes no reference to homeless people. The council are sitting on sufficient numbers of brownfield sites whereby basic starter units along the lines of Scandinavian structures could be built to help homeless people build themselves again.</p> <p>I would be interested in your response.</p>	

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KRG22			<p>With regard to the content of the programme, in my view one of the key pieces of research required to inform the new NS Local Plan is to establish precise statistics of where residents work, and how they currently travel to work. I suspect that will not surprisingly reveal that a substantial percentage of residents live in NS but work outside of the county, many in Bristol. That can then be extrapolated to illustrate the likely % of workers in new residential areas who will also make the same journey.</p> <p>Establishing the main employment locations of residents and travel distances involved will help to determine new locations for housing, infrastructure improvements and the overarching principle should be to locate housing as near as possible to where people work. It will support identification of environmental gains from appropriate siting of new residential areas aligned to employment and existing / improved public transport infrastructure.</p> <p>Secondly researching how people choose to commute and why so many travel by car, will help to highlight the inadequacies and improvements required to public transport, if the environment is to truly take centre stage in the plan.</p>	
Rob Bryher	North Somerset Council		<p>Under point 8, you say the purpose of the Local Plan is to deliver the number of homes needed. I personally think the number one concern of the plan should be how to use spatial planning to reduce carbon emissions. This has repercussions for how and whether developments are allowed if they merely continue to provide the same amount of car parking and private car use as is currently the case. We should also insist on the highest possible energy efficiency grade rather than settling for less. The plan must have a much greater emphasis on transport in this mix. It is the leading area of carbon emissions in the UK (and the only one currently growing or staying still) and is a vital part of planning anything at all. If there's no other realistic option than to drive, a planning</p>	

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			<p>application should be refused, regardless of whether it is 1 dwelling or 1,000 dwellings.</p> <p>Under point 9, you state that the new plan will be "taking account of new priorities (such as addressing climate change)". I would suggest that this is not a "new priority" for the planning profession, it has been an active concern of policy for a number of years. I think you should consider changing this to "taking account of priorities that may be require greater urgency over the plan period (such as addressing climate change)".</p> <p>That's all I wanted to say. It's a climate EMERGENCY. Let's act like it and make this the number one priority in plan-making.</p>	
Roger Higgins	Flax Bourton Parish Council		<p><b>METHODOLOGY</b></p> <p>1.The Joint Spatial Plan was predicated on a forecasted growth in the number of new jobs during the planning period - 82,500 across the four unitary authorities. In forecasting the number of new homes required in North Somerset the actual number of new jobs created should be taken into account and the forecast of number of new housing units adjusted to reflect this.</p> <p><b>SPATIAL STRATEGY</b></p> <p>2. It is likely that any employment growth will be centred on the Bristol conurbation and the selection of development sites should reflect this to avoid unnecessary travelling with a priority for public transport. A point made in many responses to the JSP - including Business South West and First Bus.</p>	

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Peter Sloman	Weston College		<p>Thank you for sight of this document and the opportunity to comment. With regard to initial feedback, Weston College would wish to see North Somerset's ambition for Weston -super- Mare to be a university town feature heavily and influence the place making, regeneration and employment strategies.</p> <p>We look forward to receiving the draft plan documents in due course.</p>	
Sue Vallance			<p>Hello, the comment I would wish to make is that I am very pleased to see the protection of the environment mentioned in this document.</p> <p>So I don't believe that any future road building fits with a climate emergency. Transport needs should be based on buses and trains and deterring use of cars.</p> <p>Building a road across to Tickenham to speed drivers on to an already over crowded M5 seems ridiculous.</p> <p>I do not live in Tickenham so this is a general point related to such issues!</p> <p>There is a housing crisis but mainly that relates to rental costs and the lack of social housing.</p> <p>Both of these problems will not be solved by building low quality private housing estates on flood plains with fake offers of "affordable housing".</p> <p>Fake, as in not really affordable to people in genuine housing need.</p> <p>Thank you.</p> <p>Sue Vallance,</p>	

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			15 Chestnut Road,  Long Ashton.	
CLH Pipeline System Ltd	CLH Pipeline System Ltd		Thank you for your email to CLH Pipeline System Ltd dated 10 March 2020 regarding the above. Please find attached a plan of our client's apparatus. We would ask that you contact us if any works are in the vicinity of the CLH-PS pipeline or alternatively go to <a href="http://www.linesearchbeforeudig.co.uk">www.linesearchbeforeudig.co.uk</a> , our free online enquiry service.	<a href="#">CLH Pipeline Systems.pdf</a>
Bristol Port Company	Bristol Port Company		<p>We were interested to receive a message from NSC Consultations about the proposed new local plan, which provided a link to the pre-commencement document. We were pleased to see that the document includes a reference to the Port and suggest that its scope should also cover:</p> <ul style="list-style-type: none"> <li>• the role the Port already plays as a nationally significant infrastructure asset;</li> <li>• applicable national planning policy for ports; and</li> <li>• the creation of freeports, which are likely to include the Port.</li> </ul> <p>We look forward to contributing to the formal plan process when it gets underway</p>	

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Backwell Parish Council	Backwell Parish Council		<p>We are pleased North Somerset Council (NSC) have published the above decision and discussion document and are undertaking a ‘soft’ consultation inviting comments on whether the scope and timetable are appropriate and whether the document covers all elements related to Local Plan production. Backwell Parish Council and our Development Working Party have read it and wish to make the following points:</p> <p>1. <b>On page 1</b> within the background it is stated (we added the underlining) that the local plan will provide “...<i>the spatial land use framework to deliver the corporate objectives of making North Somerset a thriving and sustainable place through working transparently with residents, businesses and partners to deliver a broad range of new homes to meet our growing need with an emphasis on quality and affordability.</i>” Consultation and working transparently with residents will only be successful if NSC does not ONLY give choices between outcomes that are all opposed. Similarly, we are suspicious of “standard” calculations or previous policies that are managed as “givens” and at several points we perceive this to be a risk (see later).</p> <p>2. <b>On page 1</b> towards the end of the background you include an objective to “...<i>address inequalities, tackle the climate change challenge, create safe and healthy places to live and protect and enhance our environment.</i>” We strongly support the aim to protect our environment (see later) and <i>when needed</i> create safe and healthy places to live (including not building in flood risk areas) but “<i>addressing inequalities</i>” is badly worded and not a valid concept. NSC should be trying to improve the conditions of the less well-off rather than “<i>reducing inequality</i>”.</p> <p>3. <b>On page 2</b> we welcome the emphasis on <b>CLIMATE CHANGE AND ENVIRONMENTAL IMPLICATIONS</b>. Building houses and subsequent occupation is one of the activities that most damages the environment both in terms of the energy usage and the carbon release compounded by the</p>	

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			<p>destruction of natural areas. The impact of further housing upon climate change and the safeguarding and enhancement of finite environmental assets should be the among the most critical aims and objectives to be addressed through the Local Plan. Examples are the sites of special scientific interest such as our Maternity roosts for bats etc.</p> <p>4. Document <b>page 4 item 1.3</b> includes “<i>Along with Neighbourhood Plans prepared by parish or town councils, the Local Plan forms part of the Development Plan. Section 38(6) of the Planning and Compulsory Purchase Act stipulates that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.</i>” We welcome the repetition in this context that Backwell’s Neighbourhood Plan remains a key policy for determining planning applications.</p> <p>5. On <b>page 6 item 2.2</b> we note you hope to “<b>Set out how the housing requirement will be met to 2038 through its spatial strategy and allocate sites to fulfil this requirement.</b>” We would like to remind Officers of the JSP Inspector’s comments on the JSP and the importance of conceiving a spatial strategy based on the aims and objectives of the plan. In respect of the housing requirement, whilst we acknowledge that the Local Plan must be prepared within the context of the National Planning Policy Framework 2019 and the standard methodology for housing need (paragraph 60, NPPF), careful consideration must be given to whether North Somerset is capable of accommodating the quantum of housing which arises from the standard method, in accordance with paragraph 11b of the NPPF. In this regard, many of the important areas and assets identified by footnote 6 of the NPPF are present within NSC and affect the capacity of the area to accommodate new housing in a sustainable, balanced manner. Consequently, it remains critical that North Somerset co-operate with their neighbouring authorities including but not limited to the West of England authorities. In the event that NSC is unable to</p>	



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			<p>meet its housing requirement sustainably, it should determine whether neighbouring authorities could meet this need (paragraph 26, NPPF). An aspect that is of great concern to us, is that house building is not used <u>as a way to generate</u> funds for NSC to achieve its other policies. The NPPF requires NSC to consider the opportunities presented by existing and planned investment in infrastructure, rather than the potential for future investment generated by development (paragraph 72a).</p> <p>6. In relation to Neighbourhood Plans on page 7 2.8 you include <i>“As these are prepared by local communities and not the Council, they are not listed as part of the Local Development Scheme. However, the policies contained in any Neighbourhood Plan will form part of the Development Plan once it has been formally adopted by North Somerset Council following an examination and a positive referendum.”</i> That of course does apply to the Backwell Neighbourhood Plan.</p> <p>7. On page 8 item 3.6 when discussing waste, the following is included: <i>“Strategic waste policies and proposals are set out in the adopted West of England Joint Waste Core Strategy which covers the period to 2026. There are currently no proposals to review the plan, although this will be kept under review.”</i> We request that the siting of the Recycling Centre in the Backwell Coles Quarry site is reviewed in view of the fact that it is located away from the main conurbations and so forcing residents to take waste to Backwell usually by private car. We could suggest much better locations.</p> <p>8. In relation to your draft timetable on page 9 (reproduced below), we consider this needs to be completely reconsidered. Even before coronavirus, the interval between Issues and Options (June 2020) and the start of the consultation on the draft plan (January 2021) at 6 months was much too short. We will wish to inform our residents, initiate local debates and work through several stages of document preparation revision before we will be able to submit our Parish</p>	

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			<p>Council’s response to the Issues and Options. If NSC are to have time to consider and revise the proposals to take account of local responses, we suggest you will need <b>at least 3 months</b> to do that. Therefore, we suggest the Consultation on the Draft Plan should start later. Similarly, you must allow the time (perhaps 3 months) for NSC to reconsider and revise its proposals at each step until the submission to the Secretary of State. For those consultations to be “real”, we suggest a target Submission to the Secretary of State target date end of 2022 at the very earliest. Otherwise we will argue that NSC are not taking serious account of the responses of local councils / communities. <b>The coronavirus events with the associated expected economic recession will not only mean the timetable will need to be extended further, but also the magnitude of the need for new housing will need to be reviewed.</b></p> <p>9. In Appendix 1 Supplementary Planning Documents on <b>page 12</b> we wish to emphasise the importance of North Somerset and Mendip Bats Special Area of Conservation Guidance on Development SPD. It was our opinion on the basis of expert advice received that building on Grove Farm as considered in the now abandoned West of England Joint Spatial Plan (JSP), was not acceptable based on the risk to the Maternity roosts for example in the Brockley Hall Stables SSSI (a component of the SAC). It would be disappointing if NSC did not pay sufficient attention to the needs of environment and wildlife protection in this Local Plan process.</p> <p>10. In the pre-commencement document under <b>item 10</b> we wish to highlight the following:</p> <p><b>Housing Requirement:</b> <i>The overall housing requirement to be accommodated in North Somerset using the standard method as the starting point.</i></p>	

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			<p>This policy should not be adopted without serious reconsideration of the above. There are many factors which can change such speculation / predictions in unpredictable ways. Risking our local areas and causing “planning blight” in the hope of housing that is not subsequently built is a major risk of this process. We will seek evidence that permissions already granted have been implemented.</p> <p><b>Addressing Climate Change:</b> Maximise sustainability, carbon reduction, renewable energy, focus on active travel and public transport, flood risk and coastal change, food production, greening.</p> <p>As outlined above, building houses threatens all of the above goals. If building more houses is required, then they should be located close to existing conurbations to reduce the need for motorised transport and particularly use of cars for single occupancy trips. In addition, they should be properly built, properly insulated, low energy houses, with regard to the importance of a suitable percentage of affordable homes.</p> <p><b>Infrastructure:</b> Identification of strategic infrastructure proposals, including transport.</p> <p>Considering the Climate Change risks above, building infrastructure also has major environmental risks and could cause significant damage. Rather than investing in new or improved infrastructure, the Local Plan spatial strategy should direct development to locations with good existing infrastructure provision and well located to other complementary uses to minimise the need to travel i.e. housing located near existing centres of employment and community facilities, in accordance with paragraph 26 of the NPPF.</p>	

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			<p><b>Green Belt:</b> Consider whether exceptional circumstances warrant a review of locations within the Green Belt.</p> <p>One aspect the West of England JSP that clearly produced potentially damaging proposals was the determination to not change the allocation of Green Belt. That policy led to “leap-frogging” potential development sites to making proposals for locations far distant from the locations of employment. That mistake should not be repeated in this local plan.</p> <p><b>Environmental and historic conservation and enhancement:</b> Protection and enhancement of landscapes, wildlife and historic assets, strategic green infrastructure, AONB.</p> <p>As discussed above, protection of landscapes, wildlife, green infrastructure are three aspects we will be seeking to give maximum importance to.</p> <p><b>The effect of the coronavirus endemic will have to be reviewed and understood, before these considerations / discussions are continued.</b> We hope these comments are helpful and will do all we can to try and help you develop a successful Local Plan to the benefit of North Somerset and its people.</p>	
Clevedon Civic Society (J Tranter)	Clevedon Civic Society		<p>Our comments on the above are set out in the same sequence as the proposed local plan strategic policies in section 10.</p> <p><u>HOUSING REQUIREMENT:</u></p> <p>Assessment of housing numbers should be modified to reflect reduced immigration levels post Brexit.</p>	

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			<p>This policy should make reference to the provision of both affordable housing and social housing, and how it is to be achieved e.g. By providing sites and support for self builders.</p> <p><u>ADDRESSING CLIMATE CHANGE;</u></p> <p>To maximise sustainability and focus on active travel the coast path between Clevedon and Weston super Mare should be completed as a priority. This has been discussed but not realised for decades</p> <p><u>SPATIAL STRATEGY;</u></p> <p>Strategic locations and key sites should include affordable housing in the most sustainable locations, e.g. close to employment and town/village centres.</p> <p>There should also be a restriction on the number of elderly persons sheltered schemes and an emphasis on affordable housing for younger people.</p> <p>The Civic Society would not wish to see any additional new housing in Clevedon outside the natural boundaries formed by the motorway, the Land Yeo ,the sea, and the green belt.</p> <p><u>INFRASTRUCTURE;</u></p> <p>Completion of Coast Path between Clevedon and Weston super Mare.</p> <p>Extending the segregated footpath /cycleway network e.g. through the Gordano Valley to connect Portishead and Clevedon on the route of the disused WC&amp;P railway.</p>	

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			<p>With the additional new housing ,waste water and surface water treatment capacity will have to be increased if the systems are not to be overloaded with consequential environmental impact.</p> <p><u>GREEN BELT:</u></p> <p>The Civic Society is against any intrusion into the green belt, as”exceptional circumstances” establish a precedent. This is how towns and villages coalesce over time and the original sense of place is lost.</p> <p><u>EMPLOYMENT:</u></p> <p>Redevelopment of Clevedon Town Centre presents a unique opportunity to introduce more employment and affordable housing in a sustainable location..A strong policy supported by a masterplan is essential if this is to be achieved within the lifetime of this local plan.</p> <p><u>REGENERATION:</u></p> <p>See EMPLOYMENT above.</p> <p><u>TOWN CENTRES AND HIGH STREETS:</u></p> <p>In Clevedon all the objectives in this section of the pre consultation document could be achieved as redevelopment of the town centre is imminent. Adoption of the right policies and masterplanning will produce a town centre that can survive and adapt to future changes.</p> <p><u>PLACE MAKING,QUALITY DESIGN AND PROVISION OF COMMUNITY FACILITIES:</u></p>	

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			<p>The Civic Society supports all these objectives.</p> <p><u>ENVIRONMENTAL AND HISTORIC CONSERVATION AND ENHANCEMENT:</u></p> <p>The Civic Society supports all these objectives</p> <p><u>MINERALS:</u></p> <p>No comment.</p> <p>In addition to the proposed strategic policies listed we feel very strongly that there should be additional strategic policies dealing specifically with;</p> <p>-TOURISM,</p> <p>-SPORT,</p> <p>-CULTURE INCLUDING THE ARTS.</p> <p>These activities already contribute to the local economy and are likely to increase in significance in future.</p> <p>Local Plan policies which assist these sectors to grow would be of great benefit to the community.</p>	
Taylor Wimpey		Savills (Matthews)	<p>These representations are submitted by Savills on behalf of Taylor Wimpey in response to the North Somerset Local Plan: Pre-commencement Document (March 2020) (from here on referred to as the ‘Consultation Document’).</p>	

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			<p>Before commenting upon the proposed scope set out in the Consultation Document we would first like to express our strong support for the principle of progressing the new Local Plan so promptly after taking the decision to withdraw from the JSP. Over the past few years there has been a significant undersupply of housing compared to the requirement of the adopted Core Strategy and latterly the Governments ‘Local Housing Need Assessment’ (the ‘standard method’). This has not only contributed towards the substantial decrease in housing affordability and the negative social consequences that arise as a result, but it has also led to the authority losing a degree of control over housing land supply matters due to the application of the ‘presumption in favour of sustainable development’. The only way to overcome this and to boost open market and affordable housing delivery as required by national policy is to have in place a robust and deliverable local plan which allocates sufficient housing to meet the identified need. It is for this reason that we welcome and endorse the commitment of the authority to progress immediately with the Local Plan.</p> <p>We also welcome the opportunity to comment upon the scope of the emerging Local Plan at this early stage in the preparation process. Following the withdrawal from the JSP, the scope of this Local Plan is inevitably different to that which was envisaged as a subordinate local plan sitting beneath the JSP. In the remainder of this submission we set out our comments upon the proposed scope of the Local Plan. We are very conscious of not straying into substantive matters at this stage and instead focus our comments upon the scope and relevant methodologies to be employed in the preparation of the Local Plan. Our comments, which are based upon a knowledge of the West of England area and experience gained from development plans across the country, are intended to be helpful and assist the authority in developing a sound Local Plan.</p> <p><b><u>The Plan Period</u></b></p>	



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			<p>Paragraph 7 of the Consultation Document states that the Local Plan will cover the period from 2023-2038. In so doing, it states that <i>“this time period is consistent with the NPPF requirement for strategic policies within Local Plans to look ahead over a 15 year period from adoption”</i>.</p> <p>We have concerns over the soundness of both the start and end dates of the proposed plan period. We address these in turn.</p> <p><u>End Date</u></p> <p>Whilst we are strongly supportive of the local authority progressing the Local Plan immediately and welcome the ambitious timetable proposed through the LDS, history suggests that there is a reasonably high likelihood that the Local Plan will take longer to prepare than envisaged. If there were to be a delay, there is no flexibility in the programme to satisfy paragraph 22 of the Framework which requires that strategic policies in local plans to <i>“look ahead over a <u>minimum</u> 15 year period from adoption”</i> [our emphasis].</p> <p>Rather than reviewing the plan period depending upon progress as indicated in the final sentence of paragraph 7, we would strongly urge the authority to extend the plan period now to provide a degree of flexibility should the timetable slip. It is much more straight forward to extend the plan period at the start of the plan-making process rather than take the decision part way through the preparation process. By then decisions will have been taken on key strategic matters such as the scale of the strategic housing and employment requirements and the proposed locations for development.</p> <p>The 15 year period noted in the Framework is a minimum and there is no reason why the authority could not instead propose a 20 year plan period. Indeed, this is what a number of authorities across the country have done. Increasing the</p>	

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			<p>plan period to 20 years will only provide greater certainty for all involved including local communities and infrastructure providers.</p> <p><u>Start Date</u></p> <p>Notwithstanding the comments above regarding the end date of the plan period, we note that the authority propose that the plan period only commences in 2023. Pushing the start date for the plan three years into the future is extremely unusual and not in our view justified given the particular circumstances pertaining to North Somerset.</p> <p>The Inspector appointed to examine the remitted policies of the North Somerset Core Strategy expressed significant concerns over the housing requirement contained in the submitted Policy CS13. As noted at paragraph 3 of the Second Inspectors report dated 8 November 2016, <i>“the inspector at the time recognised the limitations of the evidence base but found Policy CS13, as modified, sound subject to there being a review in the short term based upon and up-to-date full objectively assessed need for housing. Paragraph 3.190 of the Core Strategy contains a commitment to review Policy CS13 by the production of a joint development plan by the West of England authorities with adoption by the end of 2018”</i> [our emphasis].</p> <p>This commitment to review the housing requirement subsequently enshrined in paragraph 3.190 of the Core Strategy stated that: <i>“Housing supply is monitored annually in order to ensure that there remains a flexible supply of deliverable and developable land for housing. Policy CS13 is an interim position which will be reviewed through the duty to co-operate by the production of a joint development plan, the JSPS, by the West of England authorities and with a replacement policy adopted by the end of 2018”</i> [our emphasis].</p>	

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			<p>As we know, the joint development plan - the JSP - referred to by the Inspector and in the Core Strategy has now been abandoned. In the circumstances, there is no justifiable basis upon which to adopt a base date of 2023 for the new Local Plan. Indeed, to do so would be to disregard a substantial backlog of housing need which has arisen in the period since 2018 and which will continue to rise in the period to 2023. Since the examining Inspector only found the Core Strategy housing requirement policy sound on the basis that it would be replaced in 2018, it is that date which ought to be used as the starting point for the Local Plan and the base date for calculating both housing need and housing delivery.</p> <p><u>Conclusion</u></p> <p>For the reasons explained above we contend that the plan period should be extended to cover 2018-2040. This would establish an appropriate base date reflecting the comments from the Core Strategy Inspector and would provide flexibility at the end of the plan period to ensure consistency with national policy even if the preparation process were to slip by two years.</p> <p><b><u>Backdrop to Local Plan and Scope of the Local Plan</u></b></p> <p>Paragraph 3 of the Consultation Document acknowledges that the withdrawal from the JSP process presents the authority with <i>“a fresh start for the Local Plan and an opportunity to step back and reassess the strategic context and spatial strategy options for North Somerset”</i>. We wholly endorse this sentiment.</p> <p>A considerable amount has changed in the planning system and development industry since the JSP commenced with the Memorandum of Understanding signed by the four authorities in February 2014. One major change was the publication of the 2019 Framework. This brought with it amendments to the</p>	

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			<p>planmaking process including, most notably, the introduction of the Local Housing Needs Assessment (also known as the Standard Methodology). In order to be found sound, it is the provisions of the 2019 Framework which need to be reflected in the new Local Plan.</p> <p>A further significant change which has come about since the publication of the draft JSP is the proclamation of a Climate Emergency in North Somerset. The plan-making process is one of, if not the most effective mechanisms for local authorities in tackling climate change and we believe this objective should be at the front and centre of the new Local Plan. In so doing the Local Plan must sit alongside the Building Regulations regime and be clear in it's scope and requirements for future growth.</p> <p>In so far as the construction of the individual buildings is concerned, it is the Government's intention that this process is controlled through Building Regulations. The recent consultation on the Future Homes Standard which is due to be implemented through updates to the Building Regulations will further increase thermal efficiency and insulation requirements etc and ensure a consistently high standard is achieved across the country. There is very little that the plan-making role of local authorities can therefore prescribe where individual building construction and performance is concerned.</p> <p>The two key roles that the Local Plan can play however are to support the increased generation of renewable energy and direct development to the most sustainable locations. The latter is particularly important, not only in minimising carbon emissions, but supporting social and economic sustainability objectives.</p> <p>For the reasons we explained at the time, we did not consider that the submitted JSP selected the most sustainable locations for strategic scale development. The fresh start presented by the new Local Plan provides the ideal opportunity to</p>	

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			<p>reconsider how future growth within the authority can help to effectively tackle climate change.</p> <p><b><u>Strategic and Non-Strategic Policies</u></b></p> <p>Paragraph 10 of the Consultation Document sets out the proposed strategic policy areas to be covered by the Local Plan, whilst Paragraph 11 explains the scope of the non-strategic policies. It is not entirely clear from the Consultation Document whether it is the Council's intention to combine the strategic and non-strategic policies in a single Local Plan. To a certain extent the distinction between strategic and non-strategic policies is academic if both are to be contained in a single Local Plan which progresses through the consultation stages as a single document. However, if the two were to be separated, the failure to allocate sites for development through the strategic part of the Local Plan would render the Local Plan inconsistent with Paragraph 23 of the Framework and would significantly undermine the soundness of the Local Plan.</p> <p><b><u>Local Plan Evidence Base</u></b></p> <p>Paragraph 12 of the Consultation Document explains the need to commission an up to date evidence base to support plan production. Whilst there may be some evidence from the previous Regulation 18 consultation on the Local Plan that can be reused, given the changes to the scope of the plan we agree with the authority that there will need to be a series of new evidence base documents produced.</p> <p>In addition to those studies to be commissioned by the authority, a number of detailed environmental and technical assessments have been produced by promoters of strategic sites within the authority to support the promotion of land through the JSP. Taylor Wimpey is happy to share those detailed assessments it</p>	

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			<p>has commissioned for the land to the south west of Bristol. This is particularly relevant to matters such as the Habitat Regulations Assessment where detailed evidence on the potential impact from development on European Sites is fundamental to the legal as well as policy soundness of the Local Plan.</p> <p>In addition, we would like to draw attention to two key evidence base documents which are crucial to the soundness of local plans - Green Belt Assessment and the Sustainability Appraisal. The scope and methodology of both of these evidence base documents are fundamental to the soundness of the Local Plan and we would welcome the opportunity to comment upon these before work commences on their production.</p> <p><b><u>Duty to Co-operate</u></b></p> <p>We welcome the explicit recognition of the importance of the Duty to Co-operate within the consultation document. Whilst a legal and policy requirement for all authorities, it is particularly important for those neighbouring one of the UK Core Cities and where the administrative boundary is tightly drawn around the existing urban area. In such locations it is crucial that all of the authorities within the same ‘functional economic area’ and ‘housing market area’ collaborate effectively to plan for the growth needs of these wider geographies. A failure to undertake genuine co-operation will not only lead to a plan being found unsound but it will unduly suppress the delivery of housing, exacerbating existing affordability challenges and the associated negative social consequences.</p> <p>Without wanting to pre-empt discussions between the authorities, it is highly likely that North Somerset and South Gloucestershire will need to agree with Bristol City how they will accommodate a proportion of it’s housing requirement. The evidence base supporting the JSP indicated that the housing</p>	

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			<p>needs of Bristol City were 48,080 dwellings over the plan period, yet there was only capacity within the urban area to deliver 33,500 dwellings. The Standard Method output for Bristol City indicates a need for a minimum of 2,382 dwellings per annum, equivalent to 47,640 dwellings over a 20 year period. In both cases, there is therefore a difference of around 14,000 – 15,000 dwellings between the assessed housing needs of Bristol City and what was assumed to be the capacity in the urban area. On that basis it is reasonable to assume that North Somerset, as one of the three neighbouring authorities, will again need to play some role in meeting the housing needs of Bristol through the emerging Local Plan. In this context, the Duty to Co-operate is extremely important, particular in distributing the housing needs of the Wider Bristol Housing Market Area in the most sustainable manner between the three consistent authorities. We have provide our view on how to approach this challenge in the subsequent section of these representations.</p> <p>It is often said that the Duty to Co-operate is not a ‘Duty to Agree’. Whilst we agree that this is the legal position, in practical terms a failure to agree on key matters such as the distribution of housing amongst the authorities would require the appointed Inspector at the Local Plan Examination to make a judgement based upon the available evidence. In our experience this is by no means ideal as any meaningful upward adjustment to the housing requirement of a submitted development plan invariably result in a delay to the examination process. We therefore urge the authority to adopt all reasonable measures to come to an agreement with the neighbouring authorities through the duty to Co-operate.</p> <p><b><u>How to address the housing needs of the Wider Bristol Housing Market Area</u></b></p> <p>For the reasons explained earlier in our representations we strongly support the</p>	

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			<p>authority in progressing promptly with the review of the Local Plan following the decision to withdraw from the JSP process. Doing so does however present the authority with one particular challenge – how to plan for the additional housing growth arising from the Bristol City Administrative area when the three other authorities in the West of England are likely to progress a Mayoral Spatial Development Strategy with a slower timetable than the North Somerset Local Plan.</p> <p>This matter is directly relevant to the scope of the Local Plan and will inevitably go to the heart of it’s soundness. It is also really important to acknowledge this challenge now and put in place a robust response at the outset of the plan-making process. Not doing so at this stage will put the Local Plan at greater risk of delay or being found unsound as it progresses through to the Examination stage.</p> <p>The simplest solution to this challenge would be to agree a split of the housing requirement arising from Bristol City which cannot be accommodated in the city and then to incorporate a contingency mechanism to bring in reserve site(s) should the requirement increase.</p> <p>The first part of this is effectively what happened through the JSP, where the unmet need of 14,580 dwellings within Bristol City was split broadly as follows:</p> <ul style="list-style-type: none"> <li>◦ North Somerset – 5,623 dwellings; and</li> <li>◦ South Gloucestershire – 9,472 dwellings</li> </ul> <p><i>(These figures include an overall uplift of 515 dwellings which reflects the difference between the housing requirement of 105,500 in the JSP and the ORS calculation of housing need which informed the Councils’ response to Matter 3a.)</i></p>	



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			<p>A similar exercise can be undertaken this time around with reasonable and balanced assumptions made to determine the capacity to accommodate housing development within Bristol City. This will determine the residual which will need to be met in neighbouring authority areas. The agreed figure for North Somerset can then be added to the housing requirement for North Somerset to form the basis for the Local Plan.</p> <p>If all of the Local Plan's within the Bristol Housing Market Area were being examined concurrently and at the same examination this would be sufficient. However, this is not the case and there is no means of testing either the requirement for or the urban capacity of Bristol City through the examination of the North Somerset Local Plan. For this reason, in addition to the figure above we consider that there is good reason why the North Somerset Local Plan should also include a contingency of one or more 'reserve sites'.</p> <p>These matters will then be resolved through the production of the Mayoral Spatial Development Strategy and/or Bristol Local Plan. If the housing requirement or the urban capacity assumptions upon which the housing requirement for Bristol City are predicated are found not to be robust, then there is no option but to increase housing delivery within the neighbouring authorities including North Somerset. If that were to be the case then the North Somerset would have available allocated 'reserved' sites to draw upon in order to ensure that the Local Plan remains up to date and does not need to be the subject of an immediate or early review.</p> <p>We recognise that the housing requirement is likely to be a sensitive matter and for that reason we strongly recommend that the West of England authorities engage collectively with all relevant external parties, including the development industry etc in coming to a decision on how this scale of development is to be determined and distributed. The forum for this may not be the Local Plan itself</p>	

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			<p>but engagement to inform a Statement of Common Ground. Nevertheless, the two processes are intrinsically linked and hence we have made reference to that process through these representations.</p> <p><b><u>Conclusion</u></b></p> <p>We would like to reiterate our support for the decision of North Somerset Council to press ahead with the preparation of the Local Plan. Once adopted the Plan will offer much needed certainty for all involved in or affected by the development process.</p> <p>The comments provided in these representations are intended to be constructive and help establish a scope for the Local Plan which will ensure it is found sound at the future Examination. If you have any queries regarding the comments or request any further information at this stage please do not hesitate to contact me.</p>	
Wrington Parish Council	Wrington Parish Council		<p><b>Paragraph 2</b> refers to “<i>the four authorities of Bristol, Bath and North East Somerset and South Gloucestershire....</i>” The authorities cited are only three in number because the involvement of North Somerset Council in the preparation of the (now rejected) Joint Spatial Plan for 2016-2036 has been omitted in error. This should be corrected.</p> <p><b>Paragraph 4</b> This Council welcomes the opportunity to become involved in the consultation process in the Spring (20 March to 19 June) of this year, leading to the re-launch of the new Local Plan for North Somerset.</p> <p><b>Paragraph 7</b> In the <b>Introduction</b> to the text, it is stated that “<i>The existing timeframe for planning documents within North Somerset is to 2026.</i>” Yet in this Paragraph 7 it is stated that “<i>the plan period will be 2023-2038.</i>” Why is</p>	

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			<p>this new plan to commence in 2023 when the existing plan is scheduled to be valid until 2026?</p> <p><b>Paragraph 8</b> This Council welcomes there being “<i>a strong focus on tackling climate change challenge, creating healthy places and addressing inequalities</i>” together with the necessary reviews of North Somerset’s Core Strategy and Sites and Policies Plans and looks forward to being offered the opportunity to contribute meaningfully to the debate and finalisation of the respective planning documents.</p> <p><b>Paragraph 9 (and Paragraph 10, Bullet 1)</b> It would be useful if consultees could be provided (at this pre-commencement stage), with details of the “<i>housing requirement standard method</i>” referred to in this paragraph in order to assess its suitability to this area’s perceived housing requirements and to consider whether local or particular anomalies should be taken into account when reaching a figure.</p> <p><b>Paragraph 10</b></p> <ul style="list-style-type: none"> <li>• <b>Addressing Climate Change:</b> Use of the word “greening” is not particularly meaningful and would benefit from a more fitting description in order that consultees understand precisely what is proposed .</li> <li>• <b>Infrastructure:</b> This Council welcomes the proposal to review transport and is keen to ensure that the activities of Bristol Airport (including air traffic <i>per se</i>) are included in the review of proposals, taking into account matters relating to Bullet 1 above.</li> <li>• <b>Green Belt:</b> There is no firm definition of what constitutes “exceptional circumstances” and it should be a pre-requisite to any review that a working definition of “exceptional circumstances” be agreed, consulted upon, published and adopted in order to be able to</li> </ul>	

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			<p>properly protect Green Belt areas from ‘commercial exploitation’ such as has happened hitherto.</p> <ul style="list-style-type: none"> <li>• <b>Employment:</b> This Council supports the provision of employment opportunities, but there must be great emphasis laid on their being in accessible locations. The role of the port and airport as employers should be re-considered in an impartial and critical manner by independent consultants in order to ensure accurate figures are used for assessment.</li> <li>• <b>Environmental and historic conservation and enhancement:</b> It is pleasing that not only protection but also enhancement of landscapes, wildlife and strategic green infrastructure etc. are seen to contribute towards a potential policy, but there should also be strong emphasis on ecology, nature and the environment all of which are contributory to environmental enhancement. A comprehensive approach will also help to add weight and inform under the heading “Addressing Climate Change”.</li> <li>• <b>Minerals:</b> What does this text actually mean? It surely isn’t rationing of coal for instance?</li> </ul> <p><b>Paragraph 11</b> This paragraph is very wide in its scope yet is not particularly specific. Could it not be broken down into sub-paragraphs with each setting out a precise point and thereby make the content more transparent to the reader?</p> <p><b>Paragraph 14</b> How will the housing requirements for each parish be arrived at and before any figure is incorporated within the strategic policies, it is imperative that each parish has the opportunity to understand the methodology used in this calculation and, if necessary, challenge the result (See also comment under Paragraph 9 above.). No doubt North Somerset Council will make this facility available to all parishes in the interests of transparency.</p>	

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			<p><b>Paragraph 19</b> Whilst noting the words used in this paragraph headed ‘Consultation’, it is earnestly hoped that the proposed ‘community and stakeholder engagement’ will be substantially better, more meaningful and more open to listen to and take on board the views expressed by those affected and their representatives than the so-called community consultations which took place in relation to the previous Joint Spatial Plan, which was condemned by all who attended the sessions. This Council would suggest a minimum consultation period of several months rather than the 6 weeks indicated would be more appropriate and realistic and that ‘holiday periods’ are avoided.</p>	
European Property Ventures (Somerset) Ltd	-	Katherine Else - Claremont Planning	<p>Claremont Planning Consultancy (‘Claremont Planning’) is instructed by European Property Ventures (Somerset) Ltd (EPV Somerset) to provide a response to the current consultation on the Pre-Commencement Document for the emerging North Somerset Plan 2023-2038.</p> <p>Claremont Planning has monitored the emerging planning policy in North Somerset and surrounding authorities for some time; and is aware of the failures of the West of England Joint Spatial Plan and the commitment to review the housing requirement in the Core Strategy. The Council previously consulted on an Issues &amp; Options draft; however this was in the context of the West of England Joint Spatial Plan, which is no longer being progressed. The commencement of the preparation of a New Local Plan is accordingly supported, however Claremont Planning is concerned that there are risks associated with the preparation of a new Local Plan if it is not based on appropriate, up-to-date evidence and a sound and justified spatial strategy.</p> <p>This submission therefore identifies Claremont Planning’s concerns with regards to the PreCommencement Document and the emerging Local Plan more widely. In addition, the response briefly considers and makes comments</p>	<p><a href="#">European Property Ventures.pdf</a></p>

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			<p>regarding the Sustainability Appraisal Scoping Report that has been published alongside the Pre-Commencement Document, although a detailed response to the Scoping Report is not proposed due to the lack of detail available at this stage of plan-making.</p> <p><b><u>Plan Period</u></b></p> <p>It is understood that the plan period is proposed to be 2023-2038, to be consistent with the NPPF requirement for strategic policies in Local Plans to plan ahead over a 15 year period from adoption. The Pre-Commencement Document acknowledges that this may need to be reviewed dependent on progress of the Plan. It is suggested that the plan period as proposed is overly optimistic and should be extended at least to 2040, in order to provide the Council with an appropriate buffer to accommodate any delays. Claremont Planning contends that delays that Local Plans may encounter during the preparation of the Plan, or during the examination, are likely to be beyond the control of the Council. This has been demonstrated in many examples recently such as plan timetables for Eastleigh and Central Bedfordshire where there has been an extended period of time between submission and the commencement of hearing sessions.</p> <p>The proposed timetable in the Pre-Commencement Document identifies that there will be two Regulation 18 and one Regulation 19 consultation, however, does not include substantial windows of time between the proposed consultations to adequately review the responses and prepare any additional evidence that may be required in order to respond to issues identified. The plan period should accordingly be extended to 2040 as a minimum, with the housing requirement and spatial strategy reflecting that extended period.</p> <p><b><u>Duty to Co-operate</u></b></p>	

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			<p>The Pre-Commencement Document recognises the importance of joint working with other authorities on strategic issues under the Duty to Co-operate. However, it does not provide any specific parameters on what this will involve or which authorities the Council intends to work with. The Duty to Cooperate is a mandatory requirement for plan-making, recognised in the tests of soundness as set out in Paragraph 35 of the NPPF. It is therefore vital that the Council addresses this requirement appropriately from the outset of preparing the Local Plan, through meaningful engagement with neighbouring authorities. A number of Local Planning Authorities have recently been challenged at Examination, with Inspectors concluding that Local Plans have not met the tests of soundness, due to a lack of evidence of meaningful engagement and joint-working with neighbouring authorities. This has been the case in a number of Local Plan examinations recently where authorities were required by the Inspector to provide further evidence during the examination, or in the case of Sevenoaks and St. Alban's where the Local Plans were unable to proceed due to fundamental failings.</p> <p>It is particularly important that the Council engages with neighbouring authorities with regard to the Duty to Co-operate given the acute housing need issues in the West of England and constraints to housing delivery, such as the Green Belt. In order to fully understand the housing needs of North Somerset District, account should be taken of the need to accommodate the growth of other authorities within the Wider Bristol Housing Market Area, which should be based on an up-to-date housing requirement. This joint-working however should also recognise the potential for neighbouring authorities to assist North Somerset with accommodating growth, for example within Sedgemoor District.</p> <p>The potential for cross-boundary growth from North Somerset District to be accommodated within Sedgemoor District is an accepted principle, which was</p>	

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			<p>established in the Sedgemoor Local Plan 2011-2032 adopted in February 2019. This is confirmed at Paragraph 5.85:</p> <p><i>“informal discussions have taken place regarding the potential for any housing growth to be accommodated within Sedgemoor should the objective of accommodating North Somerset’s housing requirement prove to be unachievable within the district, particularly if overall housing numbers are increased”.</i></p> <p>Whilst this supporting text suggests that such an arrangement should only arise if North Somerset is unable to accommodate its housing requirement within the District, Claremont Planning suggests that this must be a consideration when establishing the spatial strategy for the emerging Local Plan. It also demonstrates a commitment from Sedgemoor Council to accommodate cross-boundary housing is required. The Framework requires in Paragraph 32 that Local Plans should be accompanied by a Sustainability Appraisal, which demonstrates how the Plan has addressed relevant economic, social and environmental objectives, and how significant adverse impacts on these objectives should be avoided and alternative options that reduce or eliminate impacts should be pursued. The Council should therefore fully consider all options with regards to the spatial strategy, recognising that whilst it will be important to accommodate growth within the District, there may be opportunities to secure some growth within neighbouring Districts. Such cross-boundary provision is likely to be more sustainable than other options within the District boundary.</p> <p><b><u>Housing Requirement</u></b></p> <p>The Council, in the Pre-Commencement Document, has not provided clarity</p>	



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			<p>with regard to what the housing requirement will be for the emerging Local Plan, or how it intends to calculate this. The housing requirement in the adopted Core Strategy identifies that a minimum of 20,985 homes are to be delivered within North Somerset in the period 2006-2026. The Council's latest Five Year Supply Position Statement (April 2019) establishes that against this target, 10,439 dwellings had been delivered during the first thirteen years of the plan period, resulting in a need to deliver 10,546 dwellings over the remaining seven years to fulfil the housing requirement. This translates to a need to deliver 1,507 dwellings per annum. The Five Year Supply Statement also provides the previous completions for each year since 1981/82, which clearly shows that peak delivery was 1,293 dwellings in one single year (1983/84). Whilst average completions since the start of the plan period in 2006 has only been 803 dwellings per annum. As a result, Claremont Planning has concerns that the authority will fail to fulfil the housing requirement for the current plan period that will have ongoing consequences for the District in respect of affordability and availability of housing. This should be a consideration when determining the housing requirement and strategy for the emerging Local Plan, alongside positive measures to boost housing delivery rates. This is further evidenced in the Council's Housing Delivery Test results. The results demonstrate that the Council has achieved only 73% and 78% in 2018 and 2019 respectively, which is significant under-delivery and has resulted in a 20% buffer on its housing land supply calculations and the requirement to produce a Housing Delivery Test Action Plan. An Action Plan was prepared in response to the 2018 test results, which refers to the emerging policy in respect of both the West of England Joint Spatial Plan and the Local Plan. It recognises that a new Local Plan requirement will be to confirm a five year supply of land for housing. Despite this, the new Local Plan should look beyond five years to ensure that a deliverable supply can be maintained throughout the plan period, avoiding recurring shortfalls in delivery such as that experienced previously. However, the Action Plan fails to acknowledge the delays between commencement of</p>	

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			<p>preparing a Local Plan and delivery from sites allocated within it. Particularly in the case of Green Belt sites, consent is rarely secured ahead of adoption of the Plan, thereby resulting in an extended period of time between identification of a site through the Plan and actual delivery of the first dwellings.</p> <p>The Council should ensure that other priorities identified in the Local Plan, such as addressing climate change and environmental considerations including landscape, wildlife and heritage do not result in the Local Plan Policy failing to deliver sufficient housing across the plan period. These constraints may restrict the potential for development at certain locations within the District, however this should be acknowledged within the spatial strategy and other more appropriate locations for development pursued. This should also include reinforced consideration of cross-boundary provision potential, as identified above, which could provide a solution and development opportunity to ensure that sufficient housing is delivered to meet the needs of North Somerset, whilst assisting in meeting needs from the wider housing market area without significant impacts on the environment.</p> <p><b><u>Sustainability Appraisal</u></b></p> <p>The Pre-Commencement Document establishes that a framework for the Sustainability Appraisal will be agreed at the outset and used to assess and inform the plan-making process. It is essential that this assessment is undertaken in a transparent and robust manner, with all reasonable alternative spatial strategies given appropriate consideration. Claremont Planning has reviewed the Sustainability Appraisal Scoping Report published alongside the PreCommencement Document which identifies the approach the Council will take when progressing the emerging Local Plan. The Scoping Report establishes the major constraints that should be taken into consideration when identifying the proposed spatial strategies and appropriate alternatives. This includes but is</p>	

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			<p>not limited to Green Belt and AONB designations; RAMSAR sites, SPAs and SACs; and flood risk from both tidal and fluvial sources. Whilst the Scoping Report sets out at a high level issues such as the ‘scale of the challenge’ and ‘potential role of the North Somerset Local Plan’ in respect of constraints and other challenges, there is a lack of detail provided at this stage as to how the constraints will be overcome and an appropriate spatial strategy devised that reaches an appropriate balance between protecting the environment and respecting designations, whilst delivering sufficient housing to meet requirements. It is essential that the Sustainability Appraisal process that accompanies the preparation of the Local Plan accurately captures the decision-making with regards to the level of housing being proposed and the spatial strategy that is to be pursued, in order to demonstrate that this is the most appropriate strategy when compared to reasonable alternatives. This should include cross-boundary opportunities, which must be given the highest consideration at the earliest stage of plan-making.</p> <p><b><u>Sedgemoor Cross Boundary Potential to Accommodate Housing</u></b></p> <p>As identified previously in this letter, Sedgemoor District Council in its adopted Local Plan 2011-2032 included provisions to accommodate a proportion of the North Somerset housing requirement if a need to do so arises. The Inspector’s report into the adopted Local Plan identifies at Paragraph 52 that this was in part due to recognition that based on commuting zones, the north-eastern part of Sedgemoor District is considered to fall within the Bristol Housing Market Area. Whilst North Somerset was at that time not anticipating that it would need to accommodate housing need within Sedgemoor District, the constraints at North Somerset may result in such a need arising. As a result, the Sedgemoor Local Plan specifies that an area of land to the north of the District could provide an opportunity to accommodate unmet needs, subject to further technical work relating to flooding and transport. The Inspector’s report</p>	

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			<p>identifies that a further main modification was proposed to set out that this may necessitate an early or partial review of the Local Plan. This is confirmed in the adopted Local Plan at Policy S1, which establishes that “Depending on the timing, nature and scale of any cross-boundary planning issues, an early or partial review of the Local Plan may be appropriate”.</p> <p>During the Examination of the Sedgemoor Plan Claremont Planning identified that an early review of the document would be required to address the unmet cross-boundary housing need; fully supporting the principle of including such provisions in the Sedgemoor Local Plan. It was identified as a fundamental requirement for the plan to recognise the challenges of housing delivery within North Somerset as part of the wider Bristol Housing Market Area and the significant demand for housing in the wider area. Over the past few years, EPV Somerset, has been actively promoting a parcel of land for development to the east of Burnham-on-Sea, located on the north-eastern corner of the junction between Love Lane and the B3140, identified on the Site Location Plan appended to this response.</p> <p>The site is well-related to the settlement of Burnham-on-Sea and abuts the settlement boundary. Comprising five field parcels, the site extends to approximately 5.6 hectares, which are currently used as pasture land. The entirety of the site is well bound by existing vegetation cover, with the edge of the urban area to the west, and further agricultural land lies to the north, east and south of the site. With regards to accessibility, the site is well located on the road network, with access possible from the B3140 and Love Lane, with existing pedestrian footpaths along the B3140. The opposite side of the roundabout from the site is occupied by a Tesco Superstore, and approximately 1 mile from the site is the town centre which provides a wider range of shops, facilities and local services. Local bus services serve the site with a bus stop</p>	

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			<p>located 150 metre away on The Frank Foley Parkway offering the regular 67 bus service between Burnham-On-Sea town centre and Wedmore village.</p> <p>The identified site is unconstrained in regard to environmental or historic statutory designations and no protected assets are located within or adjacent to the site. The site is not detrimentally affected by surface water flooding, with existing ditches existing between field parcels suitably providing land drainage. The Environment Agency flood risk map identifies that all lands to the north and east of the town have the potential to be inundated by tidal flooding but are actually defended at this time. This risk of tidal flooding influences the whole of the Burnham on Sea environment, with areas to the north identified as being at High risk, whilst land to the East is at Medium or Low risk and should therefore be considered to be preferential. The shoreline management plan aims to further reduce flood risk further through improvements to the seawall, which are to be funded by contributions sourced from new developments. Therefore, whilst flood risk is a consideration in respect of Burnham's growth, the Love Lane site should not be excluded solely due to this factor as coastal flood risk is a significant challenge to any development at Burnham-on-Sea, and further afield across North Somerset. Discussions with Sedgemoor Planning Department have identified that coastal barrier extension is intended and will establish new safety requirements at Burnham on Sea, similar to those provided at Bridgewater. As such, cross-boundary housing need can be accommodated and will provide the stimulus for delivery of improved tidal defences.</p> <p>Development at the Love Lane site would provide a significant opportunity to deliver housing to meet the needs of North Somerset, due to the excellent road links provided by the M5, which can be accessed via the B3140 which directly links to Junction 22 of the M5, less than 1.5 miles from the site. The M5 motorway provides highway connections to North Somerset District, as well as</p>	

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			<p>to road links to Bristol City Centre and surrounding areas, supporting commuting patterns. The site is also located less than 2.5 miles from Highbridge &amp; Burnham train station, which provides regular services to Weston Super Mare, Bristol and Bridgwater, as well as other destinations further afield.</p> <p>Claremont Planning has prepared a Concept Masterplan which is provided with this response and outlines the future development of land at Love Lane as part of a wider strategic expansion area to the east of Burnham. There is a strong rationale for further consideration of the site, given its robust relationship with the settlement edge of Burnham-On-Sea and its sustainable, accessible location close to the town's services. The site is unconstrained in regard to statutory designations and as such offers an excellent opportunity for residential development.</p> <p>Consequently, as the principle of locating some development within Sedgemoor District, and specifically at Burnham-on-Sea, has already been established through Sedgemoor's Local Plan, this is an option that North Somerset District should be exploring as part of the decisionmaking for the emerging Local Plan. Whilst it is entirely appropriate that the Council should be seeking to allocate as much growth as possible within the District, there are likely to be challenges due to constraints and the high level of housing need for both the District and Housing Market Area. As a result, the Council should be seeking to fully engage with neighbouring authorities at the earliest opportunity, in order to establish the full housing requirement and the most appropriate strategy to deliver growth against all reasonable alternatives. This should acknowledge the previous failings within North Somerset, the current difficulties regarding the Council's five year housing land supply position, and the high level of housing need arising from the wider Bristol Housing Market Area.</p> <p>Discussions with Sedgemoor and other neighbouring authorities in respect of</p>	

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			<p>cross-boundary housing should proceed, alongside the preparation of technical evidence should support the need to accommodate growth beyond North Somerset District's boundary, this should be acknowledged at the earliest opportunity by neighbouring authorities. Where this necessitates a partial or early review of the Local Plan, such as is the case in Sedgemoor, this should be undertaken without delay in order to ensure that the housing needs of North Somerset and the wider Bristol Housing Market Area can be appropriately met. EPV Somerset are committed to bringing forward development on land off Love Lane at the earliest opportunity to provide growth for Sedgemoor and contribute to meeting cross-boundary requirements as required.</p> <p><b><u>Summary</u></b></p> <p>Claremont Planning supports North Somerset in bringing forward a new Local Plan, in the context of the failings of the West of England Joint Spatial Plan and the challenges regarding housing delivery within the District. In recent years, North Somerset has failed to deliver sufficient housing, as demonstrated by the housing completion statistics and poor performance with regards to the Housing Delivery Test. The expedient preparation and adoption of the emerging Local Plan is therefore of vital importance to mitigate previous poor performance and ensure that sufficient housing is delivered across the next few years.</p> <p>Within the emerging Local Plan, Claremont Planning contends that the Council should diversify the locations for housing and increase the housing requirement in order to improve the likelihood of delivering sufficient housing across the plan period. The Council should also actively engage with neighbouring authorities through the Duty to Cooperate in order to ensure that the emerging Local Plan represents the most appropriate spatial strategy and is planning for an appropriate level of growth. This should encompass the housing needs arising from the wider Bristol Housing Market Area, as well as consider</p>	

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			<p>opportunities to accommodate growth in neighbouring Districts such as through a new extension to Burnham-on-Sea within Sedgemoor District, where this is deemed appropriate.</p> <p>We trust that the comments made within these representations will be given appropriate consideration as North Somerset Council begins the preparation of the new Local Plan. Should the Council require any further information regarding EPV's site at Burnham-on-Sea or any of the comments made in these representations please do not hesitate to get in contact with me on the details provided below. Claremont Planning will also provide a copy of these representations to the Planning Policy team at Sedgemoor District Council, to keep Officers informed of the representations that have been made given the potential repercussions for planning policy in Sedgemoor.</p>	
Backwell Residents Association	Backwell Residents Association		<p>Backwell Residents Association (BRA) has worked with Backwell Parish Council (BPC) in the preparation of a response to the above document. You will have received a letter, dated 31 March 2020, from BPC detailing the response to the pre-commencement document.</p> <p>BRA - which is an association with over 450 paid up households - wishes to state that it fully endorses the content of the BPC letter, and trusts that North Somerset Council will take on board the suggestions and proposals submitted, as it starts the formal process of developing their new Plan.</p>	
Richard Allam	Mr		<p>Hi, I live in Links Road Uphill and every summer struggle to park in close proximity to my home. I have two proposals which I would like to offer as solutions. The first would be to remove the restrictions between 46 - 60, as most of these properties have dropped kerbs, it would only be the home owners</p>	



Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>who could legitimately park across the drop kerb. The second would be to introduce on street charges and offer residents permits.</p> <p>Kind regards</p> <p>Richard Allam</p>	
British Horse Society	British Horse Society		<p><i>I am writing on behalf of the British Horse Society (BHS) in response to the current consultation on the North Somerset District Council Local Plan. The BHS is the largest and most influential equestrian charity in the country, working to improve the lives of horses and their owners through its four core foundations of education, welfare, safety and access.</i></p> <p><b><i>1. BACKGROUND TO OUR COMMENTS</i></b></p> <p><i>Nationally, it is estimated that there are <b>3.5 million people</b> in the UK who ride or who drive a horse-drawn carriage. North Somerset is a popular area for both horse ownership and horse riding both at small yards and major centres. We estimate that there are currently more than <b>87,000 horses</b> within the county contributing at least <b>£313 million each year</b> to the local economy, mainly through goods and services supplied by small businesses such as feed merchants, vets, farriers, trainers, saddlers, etc.</i></p> <p><b><i>Road Safety</i></b> is a particular concern to equestrians, who are among the most vulnerable road users. Between November 2010 and March 2019, the BHS received reports of 3,737 road incidents, in which <b>315 horses and 43 people were killed</b>. Research indicates however that only 1 in 10 incidents are being</p>	<p><a href="#">A case for the inclusion of equestrians to all public trails (British Horse Society).docx</a></p>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p><i>reported to the BHS; in 2016-17 alone, 3,863 horse riders and carriage drivers in England and Wales were admitted to hospital after being injured in transport accidents. (NHS Hospital Episodes Statistics)</i></p> <p><i>The BHS actively campaigns to improve road safety by making motorists aware of what to do when they encounter horses on the road (see <a href="https://www.bhs.org.uk/our-work/safety/dead-slow">https://www.bhs.org.uk/our-work/safety/dead-slow</a> – we recommend taking a few minutes to watch the ‘Dead Slow’ virtual reality film for an impression of how vulnerable equestrians are in proximity to cars and lorries).</i></p> <p><i>Because of the difficulties that equestrians encounter on roads, they avoid using them wherever possible. Road use is often unavoidable, however, sometimes simply because people have nowhere else to exercise their horses. An additional factor is that the bridleway network is fragmented, and roads are often the only available links between one RoW and the next.</i></p> <p><b><i>a) Recognition of equestrians as vulnerable road users</i></b></p> <p><i>Historically, pedestrians and cyclists have been considered as the main vulnerable road users. Equestrians are however increasingly recognised as being part of this group: during the Parliamentary Debate on Road Safety in November 2018 Jesse Norman, Under Secretary of State for Transport, stated that</i></p> <p><b><i>“We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders.”</i></b></p> <p><i>We therefore ask that the Local Plan includes North Somerset’s equestrians as vulnerable road users, to ensure that their needs are considered equally alongside those of pedestrians and cyclists.</i></p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p><b><i>b) Inclusion of equestrians in the Active Travel Strategy</i></b></p> <p><i>The term ‘Active Travel’ applies to journeys undertaken for a range of purposes, whether to reach a place of work or local amenities, or for recreation. It is also the case that many of the routes that are used to walk or cycle to work or school are the same routes which at other times provide for recreational use.</i></p> <p><i>It is now acknowledged that horse-riding is as much an ‘active travel’ mode as recreational walking or cycling. At the recent Parliamentary Debate on Active Travel in Westminster Hall, Robert Courts MP proposed that “<b>horse riders...ought to be thought about in the context of active travel as well.</b>” This was endorsed by Michael Ellis, Minister of State for Transport, who confirmed that “<b>Active travel includes horse riders and bridle paths – this debate includes them.</b>”</i></p> <p><i>Cambridgeshire and Peterborough Council has defined Active Travel as “Physically active modes such as walking, or horse riding. It also includes walking or cycling as part of a longer journey.” (See <a href="#">Cambridge and Peterborough report</a> )</i></p> <p><i>We therefore suggest that horse-riding should be included within the plan and would welcome the opportunity to contribute the development of this document.</i></p> <p><b><i>c) Equestrians to be included in any shared-use routes, wherever possible</i></b></p> <p><i>In order to maximise opportunities within development to help provide more off-road links for equestrians, where shared-use routes are created for active travel as a part of any development, planning policy should support the</i></p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p><i>automatic inclusion of horse riders on shared off-road routes, unless there are specific reasons why this is not possible.</i></p> <p><i>Conflict with cyclists is sometimes given as a reason for excluding horses from shared routes, but this rarely has anything to do with either the horse or the bicycle, simply the inconsiderate person who happens to be riding one or the other. Horse riders and cyclists as two vulnerable road user groups have more in common with each other than differences. This is illustrated by the work that the BHS is doing in partnership with Cycling UK in the current <a href="#">‘Be Nice, Say Hi!’</a> campaign and with Sustrans in their ‘Paths for Everyone’ initiative.</i></p> <p><i>The key to a successful shared route is the design: for example, rather than positioning a cycle path down the centre of a route with verges either side, the cycle path should be positioned to one side and the two verges combined to provide a soft surface for walkers, runners and horses on the other. (This also addresses the issue of horse droppings which, as research has confirmed, represent no danger to health and disperse quickly, particularly on unsurfaced paths.)</i></p> <p><b><i>d) Reference to the Hampshire Countryside Access Forum (HCAF) guidance <a href="#">Equestrians in Hampshire</a></i></b></p> <p><i>The HCAF has developed this guidance for planners and developers in response to feedback from local authorities, which indicated that they would welcome more information about how they can include equestrians in their work, engagement and consultation.</i></p> <p><i>Written by members of HCAF with support from Hampshire Countryside Service and the BHS, this document has been widely circulated within and beyond Hampshire, sparking interest from other authorities outside the county.</i></p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p><i>We would urge North Somerset District Council to incorporate the principles set out in this guidance into their planning policy: most particularly, <b>that equestrians should be considered and consulted with at an early stage within the planning of any major housing or infrastructure development.</b></i></p> <p><b>3. CONCLUSION</b></p> <p><b>“Good growth also means providing open space and leisure opportunities to encourage healthy and active lifestyles and encouraging more of us to use active forms of travel”.</b></p> <p><i>Horse riding is a year-round activity which (along with associated activities such as mucking out and pasture maintenance) expends sufficient energy to be classed as moderate intensity exercise. The majority of those who ride regularly are women, and a significant proportion of riders are over 45. For some older or disabled people, being on horseback or in a horse-drawn carriage gives them access to the countryside and a freedom of movement that they would not otherwise be able to achieve. There are also considerable psychological and social benefits from equestrian activities, as the BHS is demonstrating through the <a href="#">Changing Lives through Horses</a> initiative.</i></p> <p><i>Equestrianism is a popular activity in North Somerset, and one which contributes significantly to the local economy. The equestrian community in North Somerset currently has many difficulties in finding safe access within the County. Many issues could be addressed and resolved through good planning of future development. We hope therefore that the North Somerset Local Plan will include policies that will support this.</i></p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
Steve Lamb		Steve Lamb	<p>I am a planning agent acting for Tarmac Limited, operators of Stancombe Quarry in Flax Bourton.</p> <p>Tarmac wish to promote additional areas to the Local Plan as extensions to Stancombe Quarry on both a strategic policy and site allocation basis.</p> <p>The quarry extension areas would be for extraction of limestone to meet the demand for crushed rock aggregate, ready mixed concrete, concrete blocks and asphalt during the Local Plan period to 2038.</p> <p>Stancombe Quarry provides a vital source of construction materials to the area to assist with the built development envisaged in the Local Plan.</p> <p>Due to the current coronavirus epidemic the Tarmac offices are closed and more detailed information and plans cannot be supplied, however once society returns to normal this information can be provided and a meeting to discuss matters would be welcomed.</p>	
Cleeve Parish Council	Cleeve Parish Council		<p>The new Local Plan is an opportunity to avoid the failings of the Joint Spatial Plan by considering realistic alternative options which should be sustainable, thus reducing carbon emissions and avoiding biodiversity loss. We have two main comments:</p> <p>Housing: The base date for the New Local Plan is 2023. Its adoption is expected to be in January 2023. What is going to happen to the five-year housing land</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>supply (5YHLS) in the interim to avoid a continuation of planning by Appeal from housing developers? Currently, the Council cannot demonstrate a five year supply of housing land. As a parish, we are aware of all the Appeals from developers surrounding our locality and feel threatened and unsure how to protect our community. NSC must explain this point at the Issues and Options stage of consultation.</p> <p>Bristol Airport: CPC support the PCAA response. We agree that the Airport should be constrained to 10 mppa. If there is a need to examine growth beyond 10 mppa, a rigorous approach will be required with all information and assumptions clearly presented at the outset in the Issues and Options consultation. Detailed evidence of economic benefits against environmental costs would also be required. Thus if the Airport is to grow to 20 mppa within the Plan period options must reflect different scales of operation (expressed in passenger and flight numbers, peak road traffic flows, car parking provision and physical development on the site etc.) compared with the existing baseline situation and the commitment of 10 mppa. These options should be evaluated in terms of their environmental impacts, including implications for flights, surface access, highways, vehicle parking and physical development. The current proposal for expansion to 12 mppa and the scenario of continuing growth to 20 mppa should be compared with the current position and the commitment to 10 mppa.</p> <p>Please note that it is unlikely that the outcome of any public inquiry on growth to 12 mppa at Bristol Airport will be known or that the Airport will have submitted a new planning application ahead of the next two stages of consultation: Issues and Options Consultation (May-June 2020) and the consultation on the draft Plan (January 2021).</p> <p>Bristol Airport has failed to deliver a Master Plan for future growth of the Plan</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>period. The Master Plan was expected to be published in 2019. We therefore cannot comment of the impacts of future growth.</p>	
Somerset County Council	Somerset County Council, Environment Directorate		<p>I offer my comments on the Local Plan pre-commencement document with focus on the topic of noise and vibration and the intension is to highlight its timely consideration when striving to achieve good urban design. Good acoustic standards of building, and green space development, are intrinsic to the improvement of wellbeing and amenity and are site specific and easily overlooked without policy reference.</p> <p>I note that Building Better Building Beautiful Commission has now published three reports in 2020 on housing and neighbourhood development, focussed on the aspects of Cost &amp; Value, Building In Beauty and Living With Beauty. The Building Better, Building Beautiful Commission, established in November 2018, provided a report on 30 January 2020 and the Secretary of State has indicated that the government will now look to take forward many of the Commission's recommendations and publish its response alongside the Planning White Paper. It was announced that a National Model Design Code may also result by Autumn with the intension to set clearer, and more predictable parameters for securing well-designed places, and as such this code may have relevance to the strategic policies identified in the North Somerset Local Plan: Pre-commencement Document (March 2020).</p> <p>In my view acoustic consideration may have significance to a number of strategic policy headings identified in the Pre-commencement Document and the comments shown in blue relate to these observations:</p> <ul style="list-style-type: none"> <li>• Regeneration: More effective and efficient use of land, conversions, new uses, housing estates and other areas.</li> </ul>	



Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<ul style="list-style-type: none"> <li>◦ The policy terms of ‘efficient’ and ‘conversion’, if linked with residential development, might imply the need for acoustic (noise &amp; vibration) consideration if either the interaction of unwanted noise with residential amenity (internal &amp; external) is not to overlooked, or if the introduction of new residential sensitivities are not to constrain existing, or identified land uses nearby.</li> <li>• Town centres and high streets: Working with partners to bring forward brownfield sites, re-use vacant buildings and shops, increase people living and working in town centres, investment in the public realm. <ul style="list-style-type: none"> <li>◦ The comments made above would also apply.</li> </ul> </li> <li>• Place-making, quality design and provision of community facilities: Shaping attractive and healthy communities, green infrastructure, higher density at sustainable locations, raising design quality, creating character and identity, strategic gaps between or within settlements. <ul style="list-style-type: none"> <li>◦ While not related to strategic policy, the consideration of acoustics and soundscape may have significance when attempting to improve the quality of open community areas in urban design. In my view there is need for non-strategic policy to identify that functional acoustic performance, in addition to architectural form, is a component to achieving good design quality in buildings.</li> </ul> </li> <li>• Environmental and historic conservation and enhancement: Protection and enhancement of landscapes, wildlife and historic assets, strategic green infrastructure, AONB. <ul style="list-style-type: none"> <li>◦ Attention may need to be drawn to the attribute of tranquillity, and the adverse impact that unwanted noise from development may have on it when seeking to achieve conservation and enhancement objectives.</li> </ul> </li> <li>• Minerals: Aggregate apportionment and supply.</li> </ul>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<ul style="list-style-type: none"> <li>◦ Noise and vibration considerations would be associated with any mineral provision and this detailed within specific NPPF guidance. Constraints placed upon the efficient working of minerals will also need to be considered when determining any residential housing development near to identified mineral reserves. These comments might also apply equally in regard to protecting waste and waste processing facilities from housing encroachment and additional policy may be required for this.</li> </ul> <p>I am unaware of anyone in SCC tasked with providing a coordinated response and as such I offer these comments as part of any other responses from SCC. (Mike Highfield, Somerset County Council Acoustics Specialist)</p>	
JeremyC			<p>Note 10 Strategic Policies topic list starts with Housing Requirements, it should of course start with Climate Change and Green Belt Protection. Again Note 12 Sustainability and Green Belt Assessment is last on the list when they should of course be first.</p> <p>Although you do not state or infer that the lists are in priority order in their current form they are symptomatic of NSC ongoing and damaging fixation on building out the area of the unitary authority and running rough shod over the natural environment and the quality of life for existing and new council tax payers.</p> <p>Although my preference is detailed above at the very least the current and future topic lists should be placed in alphabetical sequence to at least give equality to all the items listed.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
Tom Leimdorfer			<p>This is a time of unprecedented change. The Sustainability Appraisal with the Baseline data is an excellent and clearly presented document. However, several assumptions behind constructing a new Local Plan no longer apply. Trends, projections and priorities need to be re-evaluated and the degree of uncertainty has increased dramatically in virtually all areas which a new Local Plan will need to address. This includes, Housing Requirement, Spatial Strategy, Infrastructure, Employment, Regeneration, Town Centres and High Streets, Community Facilities, Minerals.</p> <p>The one clear priority which we know without doubt is the need to address <u>Climate Change</u> with radical new policies and strategies. This cannot be any longer the the theoretical 'desirable if we can' policy, it must be central to all policies and planning decisions. This is acknowledged in paragraphs 8 and 9 of the document but it must be made a reality and not a paper exercise. The Core Strategy also had clear statements about sustainability and living within environmental limits, but these were routinely ignored or given less weight than other short-term considerations. Recent considerations of the Bristol Airport application demonstrated the extent to which officers were rooted in the past and out of touch with current imperatives. It may be understandable that officers see their job as producing documentation which they consider 'safe' based on past experience. It is a real challenge to be visionary at a time of great uncertainty. Government policies, guidance and processes are slow to change and local authority officers naturally feel the need to comply with what is currently there. At the same time, there is little point in producing a local plan reaching to 2038 based on assumptions which no longer apply.</p> <p><u>Housing requirement and Infrastructure</u>: Are past assumptions and the 'standard method' of assessment still valid, or are we simply following the legacy of JSP? Much of the housing currently being built or in prospect as a result of recent consents is primarily for car commuters. We need to think of</p>	

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			<p>rapid change to electric vehicles, far fewer privately owned, more shared by communities for hire, far more use of an expanded public transport network. The current extreme conditions may be temporary, but are likely to lead to many more people working from home and travelling less. The review of the <u>Green Belt appears to be essential</u>. Good public transport links will make some sustainable development close to the South Bristol Link Road logical, but less than the proposed 'Vale'.</p> <p><u>All new build must be carbon neutral</u> (passivhaus standard). Councils and Housing Associations must seek government funds to start making all their buildings carbon neutral. There needs to be a major increase in locally produced renewable energy. This will need to include a radical review of onshore wind, scrapping the current supplementary guidance. The Council should look for <u>direct investment in affordable housing as well as town centre regeneration</u>. There is a huge degree of uncertainty about the nature of future employment, retail and business opportunities following the Covid-19 crisis further complicated by Brexit. Active investment by government and local authorities will be essential but the type of investment must be governed by clear sustainability principles.</p> <p><u>Neighbourhood Planning</u> process had many positive aspects, but were limited by the need to comply with existing policies, which were getting out of date. Just one example: the Examiner would not allow the Congresbury NP to include transport policies such as local 20 mph limits because it was not in line NSC policy at the time. NSC policy has changed and now it would be consistent. Several other aspect of the NP which was supposed to look to 2036 were ruled out because they were not in line with the current Core Strategy.</p> <p>The Planning Policy Team have an unenviable task. They may feel they have to produce a plan which is consistent with current NPPF and government guidance, much of which needs to change. I would like to see a visionary,</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>radical draft document which challenges us to consider our values and the kind of society we would wish to see. As it is stated in paragraph 8, the focus must be on '<b>tackling the climate change challenge, creating healthy places and addressing inequalities</b>'. This will mean some old ways of thinking have to be abandoned.</p> <p>Tom Leimdorfer</p> <p>1 Verlands, Congresbury</p>	
Sedgemoor District Council	Sedgemoor District Council		<p>We note the above document and welcome the opportunity to comment upon it. Sedgemoor District is an adjoining local authority and therefore will be an important Duty to Co-operate consultee. The two Councils have cooperated closely together on both the Sedgemoor Local Plan (2019) as well as other cross-boundary strategic issues and we look forward to engaging positively into the plan-making process.</p> <p>We therefore are pleased to see the specific references under section 6 to the duty to co-operate.</p> <p>We note that the housing requirement will use the standard method as the starting point, it is not entirely clear at this stage whether the plan will deviate from this figure and if so what the circumstances will be to justify this although we are aware of pressures to accommodate additional growth from the wider Bristol area. We are aware of the challenges in accommodating the likely higher</p>	

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			<p>housing requirements and the difficulty this might have in terms of identifying sufficient sites and opportunities within North Somerset. Clearly this Council would wish to be advised as soon as possible as to whether there was any emerging expectation that some of North Somerset’s housing growth might potentially need to be accommodated in neighbouring districts.</p> <p>In term of the timetable set out in section 18, is this now subject to change given the current restrictions. It is challenging to undertake meaningful community consultation during the current lock down that is likely to extend into the suggested May-June 2020 Reg 18 period. Similarly elements of the evidence base are also likely to be delayed, transport assessments for example given the abnormal traffic conditions and uncertainties regarding future car use. Economic development needs and viability are also potentially going to prove challenging to undertake in the short term at least. It is difficult to predict the longer term impacts of the current Covid-19 crisis but from observation, what was already a very ambitious timetable is now likely to need updating although until there are at least some indications as to when current restrictions might be eased I appreciate that this is not really possible.</p> <p>Officers and the Council look forward to working closely on any cross boundary strategic issues including housing and transport for example and wish you well in progressing the local plan.</p>	
Tim James (NHS BNSSG CCG)	NHS Bristol, North Somerset and South Gloucestershire CCG		<p>Thanks for sharing the pre-commencement documentation and we look forward to working with you through the plan development process.</p> <p>In terms of the Pre-commencement document, there are references to creating “healthy communities”, but not explicitly to the provision of health services, or the effect of new developments on existing services.</p>	

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			<p>Am I right to think the references to “infrastructure” and the “Infrastructure Delivery Plan” will include the consideration of the effects of developments on existing health services and the requirements for new?</p> <p>If so, I think it would be helpful if this was more explicitly stated.</p> <p>In addition to physical infrastructure, a key consideration for us is the availability of staff to provide services for new populations. I would like to see this also being considered please.</p>	
Coal Authority	The Coal Authority		<p>Thank you for your notification received on the 10 March 2020 in respect of the above consultation.</p> <p>I have reviewed the document and can confirm that the Coal Authority has no specific comments to make at this early stage in the process.</p>	
Vic Slater			<p>My comments are all focused around housing in respect of the North Somerset Plan.</p> <ol style="list-style-type: none"> <li>1. The number of houses needed in the UK was estimated I believe somewhere about 10 years ago. Since that date, circumstances have significantly changed but has the Council referred back to central government for their observations. One very big change that will have an impact on the original assessments made is BREXIT. This inevitably will have the effect of dampening demand but has this been considered? Probably NOT.</li> <li>2. Homes need to be built for the homeless in North Somerset. You mention in the Pre commencement document the development of brown field sites. Surely</li> </ol>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>the Council can allocate some areas for development with Scandinavian style houses being erected to enable homeless people to have initial accommodation and give them the incentive to move on with their lives.</p> <p>3. If conceptually, the need for houses is "shortage", why are there so many 4 and even 5 bedroom houses being included in the new developments? Surely the demand should be focused on 1,2 and 3 bedroom houses, or could it be that the developer prefers building 4 and 5 bedroom houses which will produce a considerably higher profit for a modest increase in the footprint.</p> <p>4. I am all in favour of free enterprise but why should a developer seek planning permission and afterwards decide when they want to build. If planning permission is granted it should be on the basis that the development commences within say 12 months.</p> <p>5. Has North Somerset considered creating their own construction company as other councils have and which was the norm after the second world war. This would not affect employment adversely and may even increase it. It would certainly give greater control of the housing development, the overall cost and the size of houses built.</p> <p>I look forward to seeing the North Somerset Plan in due course.</p>	



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JADM			<p>Regeneration must be the first priority to help address climate change. Existing road rail and bus links between Bristol ,the Airport and Weston should be upgraded before considering the building of new roads. Rail and Metro links should be a priority.Housing should be near places of employment in Weston and Bristol. Start by building upwards in towns and use brownfield sites. Move the Green Belt outwards towards the AONB to release housing land near Bristol. Consider carefully any future development appeal by Bristol airport to help climate change. Work closely with other Councils so that you are all singing from the same hymn sheet so as to come up with a comprehensive and suitable plan for our area. Life and the way we live it will change dramatically after Covid 19 so consider the future implications in your pre commencement document.</p>	
Charles Wilson	Mr		<p>I wish to object to the proposal to prepare an independent Local Plan. Particularly at this time co-operation and partnership should be a driving force, not isolation and independence. This feels like a reactionary regression to the old NS Council and the difficulties encountered in preparing a Local Plan at taht time..</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>The housing market, economic, employment and travel to work activities are highly interdependent in this area, particularly between NS and Bristol. I believe NS will be disadvantaged by taking this unilateral approach.</p> <p>Surely it would be preferable to work with and have influence the other West of England authorities in a spirit of true partnership. Please reconsider.</p> <p>Charles Wilson RIBA MRTPI</p>	
John			<p>I don't expect you to get much general public feedback to these documents. If all you want to know at this stage is if we (the public) think that there is anything missing from your content and scope, then it could be said more clearly and in a shorter form. I don't think I saw what your methodology would be, unless that is simply your list of "other documents" and the timetable.</p> <p>Only a person experienced in the drawn out formulaic language of the ministry of circumlocution could bear to read it all. They are not easy to read and understand. There is a great deal of repetition. They are long and difficult to read on a computer. I don't think that many members of the general public will want to print off 80 pages or more to try and get a grip of the structure and feel able to home in on the areas relevant to their lives.</p> <p>My interest is to try to see whether you will set up a truly visionary plan to establish a southern motorway bypass around Bristol from M4 J18 to M5 J21 or 22. This would avoid the need for little expensive bypasses for Chrchill and the other villages. Places that have industrial estates like Nailsea need a direct link to this bypass motorway so that heavy goods can get to them without passing through residential developments. The new southern Bristol bypass would also give access to land that could be used for housing and business without</p>	

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			<p>cramming it into existing developed space which has grown without adequate sensitive and thoughtful planning control.</p> <p>The area is a mess and needs someone with really good planning skills to get us out of this mess. A garden city approach perhaps? And lets not put all our money into Weston Super Mare. North Somerset is bigger than that.</p>	
Elizabeth Porter			<p>I would like to see more emphasis on improving Public Transport, by both Bus &amp; Train. It is in the documents but in the context of reducing car use (albeit a good objective).</p> <p>My personal criteria for success will be a Bus Service between where I live &amp; Nailsea Town Centre. Even just to Nailsea &amp; Backwell Station! Plus far more trains which stop at Nailsea &amp; Backwell.</p>	
David			<p>I would have expected the Climate Emergency Policy adopted by the Council to be referenced amongst the list of relevant Policies in the Local Development Scheme document.</p> <p>Many of the other SPDs mentioned are quite old, and will be out of date, particularly in respect of Climate Emergency and Carbon Neutrality Policies adopted by the Council and National Govt.</p>	
Nailsea Town Council	Nailsea Town Council		<p>Nailsea Town Council acknowledges the content of the North Somerset Local Plan : Pre-commencement Document and wishes it to be known that they fully support North Somerset Council on the Local Plan process and acknowledge</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>that the Town Council wishes to be involved in all discussions on matters relating to Nailsea and the surrounding areas.</p>	
- Parish Councils Airport Association	Parish Councils Airport Association		<p>The PCAA represent 28 parishes surrounding Bristol Airport. Parishes have agreed the following submission by email. Our comments are as follows.</p> <p>North Somerset Council should consider the following points at the next stage:</p> <ul style="list-style-type: none"> <li>• The base date for the new Local Plan is 2023. We expect that the current NS CS23 Policy to remain in-place until the new Plan is formed. <i>'CS23: Bristol Airport Proposals for the development of Bristol Airport will be required to demonstrate the satisfactory resolution of environmental issues, including the impact of growth on surrounding communities and surface access infrastructure.'</i></li> <li>• It is unlikely that the outcome of any public inquiry on growth to 12 mppa at Bristol Airport will be known or that the Airport will have submitted a new planning application ahead of the next two stages of consultation: Issues and Options Consultation (May-June 2020) and the consultation on the draft Plan (January 2021). This being the case, the PCAA believe that the assumptions in respect of airport growth should be clearly stated at the time of these consultations.</li> <li>• Note that the Airport has failed to deliver a Master Plan for the time period of the new Local Plan. In the absence of an Airport Master Plan which was expected in spring 2019, there has been no discussion on the environmental impacts of growth beyond 12 mppa to 20 mppa. NSC must recognise that a) the thousands of objections to the planning application 18/P/5118/OUT show that local communities do not want further growth at the Airport b) it is unfair to expect parishes and residents to respond to these consultations on airport growth to 2038</li> </ul>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>with no information on the environmental impacts. We would therefore expect a ‘do nothing’ approach to be the favoured approach in the Issues and Options and the draft Plan consultations.</p> <ul style="list-style-type: none"> <li>• We appreciate that NSC is operating in an aviation policy vacuum as the new strategy known as ‘Aviation 2050’ is not expected to be published until later this year. Note that the Government is also planning a consultation on a Net Zero emissions target for the aviation sector later this year.<sup>1</sup> It is therefore important that NSC makes clear its own policy on ‘Carbon Offsetting’ which should indicate that carbon offsetting should not be used to allow development of infrastructure that pollutes. It should only be used to reduce current emissions and is a policy of last resort.</li> <li>• There is no certainty that we will meet our current and future UK carbon budgets in which case steeper reductions will be required within the period of the Local Plan to 2038. The Committee on Climate Change will publish its annual Progress Report at the end of June. This will indicate whether the UK is on track for Net Zero Emissions at 2050 and is keeping within budgets already set. Any recommendations by the Committee of Climate Change should be incorporated within the next consultation of the Local Plan. There must be flexibility within the Plan to reduce carbon emissions further.</li> <li>• We note that the North Somerset Climate Emergency Strategic Action Plan omits any reference to Bristol Airport or the construction of new roads to and from the Airport. We request that the criteria for the building of a new road is made public within these consultations. It is important that the public are able to assess why these new roads will be needed, what sectors they are supporting and how they have been judged to be really necessary. The explanations should show clear alternatives and explain the reasons why a public transport option is not pursued.</li> </ul>	

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			<ul style="list-style-type: none"> <li>• A policy statement should be given on ‘replacement land’ which is necessary for any development in order to replace wildlife habitats destroyed. The policy should state that ecological surveys should be carried out on all ‘replacement land’ and that they become mandatory parts of the environmental statements submitted in support of planning applications.</li> <li>• We recognise that the Local Plan is a strategic document but we believe that important policies are not yet in place to support some of the decisions which will be made in the Plan for example: Carbon Offsetting; Criteria for building new roads; and Replacement of Habitats.</li> <li>• The Corona Virus may result in major structural changes in the way people work due to video-conferencing. We believe that one of the main reasons for growth at an airport, that of business connectivity, will be reduced.</li> <li>• If the Airport is to grow to 20 mppa within the Plan period options must reflect different scales of operation (expressed in passenger and flight numbers, peak road traffic flows, car parking provision and physical development on the site etc.) compared with the existing baseline situation and the commitment of 10 mppa. These options should be evaluated in terms of their environmental impacts, including implications for flights, surface access, highways, vehicle parking and physical development. The current proposal for expansion to 12 mppa and the scenario of continuing growth to 20 mppa should be compared with the current position and the commitment to 10 mppa.</li> </ul> <p>Our comments on the consultation are as follows:</p> <p>Sustainability Appraisal Scoping Report 2020:</p>	

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			<p>The report acknowledges that the Bristol Airport planning application 18/P/5118/OUT was refused and that ‘<i>planned expansion has the potential to impact a range of environmental (and socio-economic) receptors</i>’. Thus, the Association believe that the Airport should remain constrained at 10 mppa and the permitted development rights of the Airport should be removed. Removing the permitted development rights of the Airport goes beyond the ‘Retain Existing Policy, Option 1’ in the consultation titled ‘Local Plan 2036, Issue and Options’. We request that this point is considered in the next stage of consultation.</p> <p>Pre-commencement document:</p> <p><b>Addressing Climate Change:</b> A constrained airport would maximise sustainability by not allowing an increase in carbon emissions from further development of infrastructure on site, from car travel to and from the airport and from increased flights and it would allow carbon reduction measures to be taken through carbon offsetting to compensate for current activities.</p> <p><b>Spatial Strategy:</b> A totally constrained approach would recognise that Bristol Airport is situated in the wrong location. Dr Fox MP sent a letter to North Somerset Council dated January 2020. Dr Fox says that "expansion cannot continue indefinitely so the question becomes one of balance." He asks "What is a reasonable limit for expansion?" As there is already planning to allow a further increase to 10 mppa we would suggest that this should become the balance figure. If there is need to examine growth beyond 10 mppa a rigorous approach to the estimation of economic benefits against environmental costs would be required.</p> <p><b>Infrastructure:</b> There is need for sustainable public transport in order to decrease car travel to and from the Airport within the 10 mppa planning</p>	

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			<p>consent. No new roads should be built. The Department for Transport published a consultation titled 'Decarbonising Transport – Setting the Challenge' on 26 March 2020 which recognises that emissions from cars must be reduced. North Somerset Council should be transparent on any future infrastructure that is being proposed including showing the evidence for the need of the infrastructure. There should be no presumptions about the future of the airport or related proposals such as the 'South West Economic Link' (increasing capacity on the A38 south west of Bristol) or links to the M5 (increasing capacity on the A368 corridor and a new M5 Junction 21A).</p> <p><b>Green Belt:</b> There should be no review of the green belt on and surrounding the Airport. We suggest that the green belt is extended to protect the Mendip Hills, an Area of Outstanding Beauty.</p> <p><b>Employment:</b> There is an error in paragraph 3.43 of the Sustainability Appraisal Scoping Report. Due to technology many jobs at the airport have not materialised.</p> <p><b>Place-making:</b> Through the very nature of its operational activities, the Airport cannot contribute to enhancing communities or their well being.</p> <p><b>Environmental:</b> Bristol Airport activities impact in a harmful way on the Climate, Biodiversity, Communities and the Mendip AONB.</p> <p>References 1.</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876251/decarbonising-transport-setting-the-challenge.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/876251/decarbonising-transport-setting-the-challenge.pdf</a> (paragraph 2.56)</p>	



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Simon Hegarty			<p>It is with regret that I notice that there is very little reference in this Pre-Commencement Consultation document to the reasoning behind the JSP Inspectors' decision to find the JSP unsound. There is mention of the JSP's Inspectors' first report in July but not the second one in November which contained detailed reasoning. The JSP documentation is also to be removed from the website. While there is mention of a "fresh start" being taken, it would seem vital for the Local Plan to take full account of the thinking and comments of the 2 experienced JSP Inspectors and for their findings to be referenced in the consultation and preparation of the Local Plan so the same mistakes are not made and a truly "fresh start" is taken.</p> <p>There is an exceedingly strong public interest argument which asserts that the data now withdrawn in this case is essential to the informed examination of all future plan proposals. The lost deliberations represent, not only the data gradually accumulated over several years by the four Local Authorities themselves, at substantial public expense, but also the effort expended by a small army of interested parties, many with special expertise, and all concerned to contribute to the ongoing consultation processes taking place ever since 2015. Furthermore, the Examination proceedings themselves, including the Inspectors' own contributions, are thereby lost. Work done for the Joint Spatial Plan provides a substantial part of the foundation upon which a new Local Plan, for each Authority, will need to be based. Embedded therein is much of the most recent pertinent data upon which responsible planning must rely.</p> <p>NSC Executive and its Senior Planners should be encouraged to take full account of the serious past mistakes and undertake a much more meaningful consultation than that undertaken in the JSP process. Having wedded themselves to their own selection of SDLs at the outset, they seemed wholly unwilling to take any account of the cogent and well expressed input of the public and various bodies and action groups throughout the JSP process. It was</p>	

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			<p>only the Examination process which obliged them to address the failings of the plan and even then they failed to respond to the Inspectors' initial concerns. The selection of the majority of the SDLs (including Churchill) was but one of the main criticisms of the JSP Inspectors.</p> <p>Therefore the lessons and findings of the JSP must be referenced and taken account of in the consultation on and formulation of the new Local Plan. Failure to do so will suggest that NSC and its Senior Planners are as obdurate as previously and this will reduce further the public's already limited confidence in the local planning process. The ultimate danger is that the Local Plan will fail as badly as the JSP.</p> <p>A "fresh start" does not mean sweeping away the lessons of the past. It means recognising them, learning from them and benefitting from them.</p>	
Deirdre Marshall			<p>I have read your pre-commencement document (March 2020) I would like to comment on the following.</p> <p>Point 10 : Food production is mentioned under Climate Change and also the need for strategic intra-structure proposals for transport.</p> <p>Point 14: Backwell's Neighbourhood Plan had already identified development requirements in the village sufficient to meet anticipated demand. Building work is well under way.</p> <p>As you will be aware the defunct JSP identified the need to build 700 houses on Grove Farm anticipating that the major employment opportunities will be in Bristol.</p>	

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			<p>This would have involved building on agricultural land needed for food production, so food production will be reduced. Approx. 200 cars passing through Backwell and Flax Bourton along the A370 commuting to Bristol, when the roads are already congested at peak times. Noise, pollution and congestion will ruin both these villages.</p> <p><u>Government sponsored Neighbourhood Plans must not be side-lined to suit the developers. The Local Plan states that “neighbourhood plans ...must not promote less development than is set out in the strategic policies for the area” So who decides how many houses can be integrated into the village without destroying it’s character and overwhelming the infrastructure.</u></p> <p><u>Surely small pockets of development can be made in many villages “spreading the load” rather than destroying the character of a few villages.</u></p>	
Revd.Patrice Sessions	Bleadon-Hillside Community Association		<p>I write on behalf of Bleadon-Hillside Community Association.</p> <p>Our residents would value the opportunity of commenting on the newly developing spatial plan through our committee, and would be grateful if you would please keep us in the loop/advised as matters are discussed.</p> <p>We would like to suggest that a gentle review of the project every,say, 5 Years might be helpful as the whole plan is to develop over 15 years and inevitably there will need to be changes over time.</p>	
Woodland Trust (SW)	Woodland Trust		<p>As the UK's leading woodland conservation charity, the Woodland Trust's vision is for a UK rich in native woods and trees, for people and wildlife. We work to protect, restore and create native woods, trees and their wildlife for the future.</p>	

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			<p>We manage over 1,000 sites, including over 200 across the South West, and have 500,000 members and supporters.</p> <p>Thank you for the opportunity to comment at the Pre-Commencement stage of the new Local Plan process for North Somerset. Please see below some brief comments and we look forward to further engagement on the Plan process.</p> <p>At a time of climate, nature and health crises - which are very much interrelated, Local Plans play a crucial role in place-shaping for a healthy and resilient future in the face of much change. We urge North Somerset Council to be truly ambitious in new policies and approaches to respond to these challenges in an integrated way.</p> <p><b>Pre-Commencement Document:</b></p> <p>We note the policy areas and highlight the importance of ensuring that green infrastructure principles are embedded across all areas of the Plan, and underpin healthy places. We welcome the West of England Green Infrastructure Strategy currently in development, and the West of England Nature Recovery Network as a local response to Government's 25 Year Environment Plan, as highlighting landscape-scale issues and opportunities.</p> <p>We highlight the strengthened protections in the updated National Planning Policy Framework for ancient woodland and ancient &amp; veteran trees (alongside other irreplaceable habitats) at para 175c. As you consider potential policies, our <a href="#">Planners' Manual for Ancient Woodland and Veteran Trees</a> may be a useful resource.</p> <p>In the context of the climate and nature crisis, we have published our <a href="#">Emergency Tree Plan</a> which considers the role of trees &amp; woods, and actions at local authority level. This calls for Local Plans to be bold in requiring at least</p>	

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			<p>30% canopy cover across new developments, and we welcome working with North Somerset Council on developing such a policy.</p> <p>We acknowledge that it is not the remit of the Local Plan to directly address wider land management, but it clearly plays an influencing role. We urge a strategic approach to the delivery of Biodiversity Net Gain as well as the forthcoming requirement for Local Nature Recovery Strategies. We are seeing elsewhere, and would strongly encourage North Somerset to consider, development of a 'call for sites for nature recovery' mechanism alongside other innovative approaches to ensure these new requirements act as catalysts for joined-up action on nature recovery and climate. We highlight the role of the West of England Nature Partnership in supporting this thinking.</p> <p><b>Sustainability Appraisal:</b></p> <p>Regarding the '<i>Potential role of the- North Somerset Local Plan</i>' for the 'Climate Emergency' (pg 49), we would expect this to also include the role of natural climate solutions in not only capturing and storing carbon, but also helping build resilience to the impacts of climate change (i.e. role- of green infrastructure in reducing flood risk, urban heating, etc.) - and thus the interrelated goals of nature recovery and responding to the climate emergency. This area should also explicitly address both mitigation and adaptation to climate change.</p> <p>We welcome the acknowledgement on pg 59 (Biodiversity, Geodiversity &amp; Green Infrastructure) that development can both enhance and negatively impact on ecological corridors. It is crucial that a systems-based approach (which considers connectivity and scale) is taken to the application of Biodiversity Net Gain and natural capital.</p>	

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Jan Murray	CALRAG		<p><b>Comments from Churchill &amp; Langford Residents Action Group (CALRAG)</b></p> <ol style="list-style-type: none"> <li>1. <b>North Somerset Local Plan and West of England Joint Spatial Plan (JSP):</b> This new local plan is an exciting opportunity to embrace future growth in North Somerset whilst at the same time rejecting the failings of the previous Joint Spatial Plan (JSP). This local plan must not and cannot be a repeat of the JSP which the Inspectors found to be so seriously flawed. The Inspectors' main concerns were focussed on the spatial strategy and allocation of Strategic Development Locations (SDLs). However, the evidence-base acquired during preparation of the JSP remains crucial to all future plans*. Local plan preparation must now take a different course.</li> <li>2. <b>Evidence for Issues and Options consultation:</b> The JSP contained extensive investigations which remain pertinent to the preparation of future local plans. The Issues and Options documentation <b>must be open and transparent and ensure that the evidence including some that was collected for the JSP, as well as that relating to transport modelling is detailed and clearly presented.</b> Furthermore, the evidence about land use assumptions that were used for the analysis and proposals of the Joint Local Transport Plan should also be made clear.</li> <li>3. <b>Climate Change:</b> The Climate Change Emergency declared by North Somerset Council (26<sup>th</sup> February 2019) to go Carbon Neutral by 2030 must now be taken into account in the new Local Plan.</li> <li>4. <b>Green Belt Review:</b> In order to achieve a rational assignment of residential development, a Green Belt Review must be carried out so that houses are built close to</li> </ol>	<a href="#">CALRAG response to Pre Comm Local Plan.docx</a>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>employment and public transport. The Green Belt review is essential particularly for the Belt surrounding Bristol. Introduced some sixty years ago but in present circumstances, it is producing an impossible constraint, especially in an already seriously spatially constrained North Somerset.</p> <p><b>Question:</b> Is it realistic to progress to Issues and Options consultation in May/June prior to carrying out a comprehensive Green Belt Review?</p> <p>5. <b>Employment and Housing:</b> A notable feature of North Somerset is that employment opportunities are concentrated in Bristol. New housing should be concentrated in locations close to the jobs in Bristol. The current plethora of totally unsuitable, opportunistic planning applications is leading to bad planning and unnecessarily overstretched planning departments and unprecedented local anger. This needs to be addressed as a priority.</p> <p>6. <b>Remote Strategic Development Locations (SDLs):</b> Such SDLs as Churchill/Mendip Spring as proposed in the JSP, would be unsustainable and inappropriate since they amplify the energy expenditure required for commuting transport and should not be included in any future Local Plan. This fact will remain, as Bristol grows, even if some fraction of commuting is removed by remote working. The proposed SDL at Churchill (SDL7.6) is an extreme example of these highly problematic locations.</p> <p>7. <b>Infrastructure – Transport:</b> National circumstances have altered profoundly since the JSP was submitted and rejected. Such changes must ensure equally profound changes in the planning process for all local authorities. We have now both a nationally recognised climate emergency and also an unprecedented crisis provoked by COVID-19. Furthermore, the recent</p>	

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			<p>rejection by North Somerset Council of the Bristol Airport Expansion proposals must profoundly change future infrastructure requirements. The primary aim must be to greatly reduce energy expenditure, much of which is devoted to transport.</p> <p>A major reassessment of local transport priorities is also required. Ever-expanding roads schemes offer no evident answer.</p> <p>8. <b>Public Transport:</b> More energy-efficient transport modes including a greatly expanded rail service, should be sought.</p> <p>9. <b>Environmental and historic conservation and enhancement:</b> CALRAG fully supports the Pre Commencement document #10 <i>“Protection and enhancement of landscapes, wildlife and historic assets, strategic green infrastructure, Mendip Hills AONB”</i></p> <p>10. <b>Public Consultation:</b> CALRAG is extremely concerned that public involvement in this Pre Commencement consultation and the forthcoming Issues and Options (May/June) due the current circumstances, is not practicable with no facilities to inclusively and appropriately consult all residents due to Covid-19. Even Parish Councils are unable meet. Will North Somerset Council review the timetable for the consultations.</p> <p>* It is particularly unfortunate that (on 7/4/2020) removal from public access took place of all the collected JSP documentation. This removal of information (of which the WoE authorities are custodians, not owners, and which was publicly financed) is totally unacceptable and must be reversed in the public interest.</p> <p>On behalf of Churchill and Langford Residents Action Group</p> <p>Robin Jeacocke</p> <p>Jan Lyons</p>	



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			Jan Murray	
Environment Agency	Environment Agency		<p>Thank you for referring the above Pre-commencement Document, which was received on 10 March 2020.</p> <p>I can confirm that the Environment Agency concurs with the proposed content, scope and methodology of the plan and looks forward to future involvement in the Local Development Framework process.</p> <p>Please quote the Agency's reference on any future correspondence regarding this matter.</p>	
Tickenham Road Action Group	Tickenham Road Action Group		<p>We have seen through the JSP work that focussing on the housing requirement can lead to inappropriate transport proposals and routes. The Local Plan should consider the wider multi modal transport needs (e.g. key transport corridors between towns, cities, motorways and airports) when identifying transport proposals.</p> <p>Bruce Campbell</p> <p>Tickenham Road Action Group</p>	
J Milward			<p>I would like to respond on behalf of <b>Butcombe Parish Council</b> with the following points -</p> <p>1. Butcombe Parish Council would like to see the Local Plan process transparently informed by North Somerset Council's declaration of a Climate</p>	

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			<p>Emergency in 2019. This should be explicitly stated in all Local Plan documents. There is no mention of the Climate Emergency in the Pre-commencement consultation paper. There seems to be little point in North Somerset Council going to the trouble of voting to adopt a Climate Emergency unless this issue now underpins the development of future planning policy.</p> <p>2. One of the key local planning issues has been the proposed expansion of Bristol Airport and the potential social and environmental degradation resulting. We would like to see Bristol Airport considered as a separate topic in the Local Plan, with particular emphasis given to solutions to the scourge of unauthorised offsite Airport parking.</p> <p>Yours sincerely, JUSTIN MILWARD</p>	
WilliamM	Family concern		<p>Hi</p> <p>Please find my comments on the pre-commencement document which I hope you find of use. If you would like any further feedback then please feel free to make contact. I am looking forward to the next iteration and would like to be part of its development.</p> <p><b>PORTISHEAD LOCAL PLAN</b></p> <p><b>Perspective</b></p> <p>The comments are general views.</p> <p><b>History.</b></p>	<p><a href="#">PORTISHEAD LOCAL PLAN.docx</a></p>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>The Plan should be set against the historical growth of Portishead and the wider South West. Showing the town as a vibrant place where people want to live and grow. The plan should have a comment on the migration patterns of people moving from low employment areas to find work in better places. The emphasis being people want to live in nice places and economy moves with people. For our town to grow we need our plan to show that Portishead is an open and welcoming community and not a large retirement or commuting dormitory settlement.</p> <p><b>Land Locked.</b></p> <p>Portishead is pressed against the Bristol Channel and flanked by extensive fluvial flood zones in the ‘muddy’ Gordano Valley and is further restricted by the Green Belt which constrains Portishead in a tight knot of slow strangulation.</p> <p><b>Green Belt.</b></p> <p>The green belt must change to allow for growth and the local paradigm for Portishead seems to be to defend the ‘sacrosanct’ Green Belt at all costs. The Green Belt misrepresents itself as something to do with green issues but should be reworded to say, ‘under no circumstances should any houses be built especially around me’.</p> <p>Let us build on elevated levels and rewild flood areas and move the Green Belt to other places and protect and grow as many trees as humanly possible.</p> <p><b>The Joint Spatial Plan.</b></p> <p>The writings (JSP) seem to be so vast as to give any reader the ability to use the variety of plans and the reader a wide range of interpretations. The whole pile of documents is fantastic for information gathering but far too big and when used</p>	

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			<p>with the other documents are overly complex the whole should be made simpler for people to read.</p> <p>Many of the plan writings and idea developers are mostly from people who have hard fixed ideas that to protect natural England is their mantra and any development especially houses are bad then plans will be written in an unbalanced and bias way. Portishead needs to break out and the plan needs to show it has an attitude to allow land availability for individuals to build their own houses that fits the need of the community and the individual.</p> <p>A good thing would be if the town planners went out and identified infill sites and proactively help and assisted individuals to build their own homes, more like our European neighbours. If the council implemented the spirit of the self-build edict and help people find the land, then the housing problem would significantly diminish.</p> <p>Self-Build is the way forward and we should look at other countries and change the mind set of our planners and local politicians to stop mass greedy developers and set a principal of own design to suit people's dreams. Self-Build is absent from the report, should this be one of the plans earliest considerations?</p> <p><b>Climate Change.</b></p> <p>The Pre-commencement Document should at the outset have a backdrop of the rising sea water and climate change that <b>will occur</b>. The 15 year lookahead feels far too long to plan for impenetrable changing events and to allow for more rapid seasonal changes say 10 years would be more appropriate.</p> <p>Climate change is a global event and the local plan should reflect this. We should do all we can, but our efforts must be set against the backcloth of global realities which we have little control over. Recent studies indicate 40% of</p>	

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			<p>emissions come from overseas. What <b>we consume</b> should be set as a milestone this will focus minds on CO2 as heavy industry has moved overseas but the manufacturing still produces heavy greenhouse gasses which should be a concern as the pollution still comes home to roost. The UK should work with others and manage these shared emissions and the local plan should give heavy weight to this point.</p> <p><b>Rising Seas.</b></p> <p>By 2118 according to recent studies the level of potential flooding in Portishead's High Street will be about 8.8m and the current level of the road is about 7m so water surges will potentially be 1.8m above what it is now? If this is the case, then every 10 years or so we will see a rise of about 200mm and as a large proportion of Portishead is in a floodplain insurance might not be able to cover the future so let's resist building in flood areas or if we do then allow for undercrofts or elevated housing designed for floods and lest not forget boat moorings when floods do occur.</p> <p><b>Innovative House Building.</b></p> <p>The current virus pandemic and future climate change will no doubt affect human culture and may trump all other issues facing humanity. Design of our built environment should focus on construction design to take account of future viruses and methods to reduce their impact at design stage.</p> <p>The general attitude that construction in our society as a lesser career choice is a fundamental problem for our ability to train crafts and engineers. Meeting the need for housing and building for communities requires a step change in our education system. We simply are not training for craft apprentices. The local plan has a need to show that training our young for the jobs we need is the</p>	

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			<p>foundation of any plan as without basic training who will do the work to build our future.</p> <p>Boom and Bust is the worst thing for builders. The local community should ensure that the local builders are provided with continuous work to allow for local employment and facilitate local builders to take on apprentices. The plan should ensure that we in the community should prioritise work for the local builders. Local Architects and local builders should be promoted to assist ordinary people to commission houses for dreams and aspirations of local people.</p> <p>We should move away from the mass housing developers who are building the smallest houses seen in the last 100 years for the biggest profits they can design for.</p> <p>The move away from houses being entirely built on site to factory-controlled production is the way forward. We can set conditions within our local plan to promote flat pack housing to improve quality and reduce the amount of skilled trades needed. Factory house production should be encouraged as it produces more quality it reduces waste and emissions.</p> <p>Let's build on elevated levels and re-wild flood areas with plenty of trees and move the Green Belt to other places and not set up new housing estates in a way that increases travel distances which intern produces more CO2.</p> <p><b>UK Planning need to change.</b></p> <p>The planning system is reactionary, incredibly tortuous, and open to wide interpretation which all comes down to the subjective views and prejudices of the individual planning offices and inspectors. Many viable small applications are turned down using vague criteria which go even further on top of the Green</p>	

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			<p>Belt restrictions. Inspectors can set aside legal precedent and change the rules to suit their own ideas and can find easy ways to reject rather than pass applications.</p> <p>Council planners can tick boxes from their offices that they need specialist consultants to produce expensive reports. The applicant must pay for these often-generic reports that we suspect half the time do not get read, only perhaps beyond the conclusions. The council planner can obtain some of this information and be dealt with quite simply rather than adding unnecessary additional costs to the customer.</p> <p>The council's effortless way is to tick a box and wait for a consultant to respond and hold up or even stop a planning application. It seems that the planning application is one of the main reasons that houses are not being built and this needs to have some weight in the local plan.</p>	
Viv Tomkinson	Congresbury Residents Association Group		<p>These comment are submitted on behalf of Congresbury Residents Action Group (CRAG)</p> <ol style="list-style-type: none"> <li>1. We want to endorse the comments submitted by Tom Leimdorfer on 16<sup>th</sup> April 2020. Comment ID 936033/1</li> <li>2. The timetable detailed under Paragraph 18 is unrealistic - it suggests that the Issues and Options consultation will be undertaken in May and June 2020 - but given that the consultation on the Pre-Commencement Document does not close until 22nd April it seems highly improbable that the Council will be able to launch Issues and Options consultation</li> </ol>	<p><a href="#">210420 CRAG comments on LP Pre-Com doc.docx</a></p>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>in May 2020. We believe that it is important that NSC set out a realistic and meaningful timetable that is genuinely achievable. This will enable more proactive monitoring to ensure that the critical milestones are achieved.</p> <p>3. Paragraph 10 sets out the strategic policies which will be contained in the Local Plan. This includes a policy on Infrastructure to identify strategic infrastructure proposals including transport. CRAG believes that the issue of transport is extremely important as a key factor that will be material to the whole of the Spatial Strategy. Therefore, we suggest that Transport should be the subject of a separate strategic policy in the Local Plan. There is a risk that Transport would become subsumed by other infrastructure issues if it remains as a component of an overarching Infrastructure Policy. This would be a grave error and would compromise the Council's ability to deliver the Local Plan including the Spatial Strategy.</p> <p>4. Given the Coronavirus outbreak the proposed three separate strategic policies on Town centres and high streets, Regeneration and Employment will be critical - but there must be an imperative for the Council to take action on these issues immediately and not to defer generating action to alleviate the consequences of the Coronavirus outbreak until the Local Plan is adopted.</p> <p>5. Paragraph 10 indicates that a strategic policy will be included to consider whether exceptional circumstances warrant a review of locations within the Green Belt. We appreciate that this is perhaps necessary to ensure compliance with the NPPF which makes clear in Para 83 that use of existing Green Belt in is allowed in exceptional circumstances. But we must argue that NSC needs to acknowledge that review and revision of the Green Belt is essential. We have previously</p>	



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			<p>pointed out that NSC did not comply with Para 85 of the NPPF when setting the current Green Belt boundary as it did not designate “safeguarded land” between the urban area of Bristol and the Green Belt in order to be able to meet future development needs. We acknowledge that the Green Belt was designated before the current NPPF was published but this major omission means that there are without doubt exceptional circumstances that necessitate review of the Green Belt given the need to provide housing close to centres of employment and the overall housing target faced by NSC.</p> <p>6. We have also looked at the Sustainability Scoping Report. We are confused by the status of this document. Paragraph xii on Page 6 states</p> <p>"The Scoping Report is published for consultation in accordance with the SEA Directive and Regulations. Consultation on an interim scoping report took place alongside the consultation on a Local Plan Issues and Options document in 2018. This revised scoping report will accompany the new Local Plan Challenges and Choices document which is due to be consulted on in May 2020."</p> <p>It is not clear if you are consulting on this document. We assume that this consultation will be undertaken as part of the consultation on the next iteration of the Local Plan. If this is not the case, then you need to issue the Sustainability Scoping Report separately for formal consultation.</p> <p>7. As flagged by the quotation from the Sustainability Scoping Report above, the Scoping Report refers to the next stage of the evolution of the Local Plan as the Local Plan Challenges and Choices document. But the Pre-commencement Document details the next stage of consultation to be on "Issues and Options". The terminology needs to be consistent and match across all documents. We would add that as</p>	

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			<p>you have previously used the title "Issues and Options", it may be less confusing for all if the next iteration of the Local Plan was to be titled "Challenges and Choices"</p>	
Wraxall and Failand Parish Council	Wraxall and Failand Parish Council		<p>Coronavirus has already had an impact on economic growth and this is likely to continue until there is a vaccine. It may result in changes in the way people work, eg increased use of video-conferencing and home-working. It is considered that the Issue and Options Consultation should address the impact of coronavirus on the new Local Plan.</p> <p>The premise in the JSP was that development should be close to the areas of employment. The Pre-commencement Document is unclear about which of the proposed strategic policies will address where development should take place in the Local Plan area (para 10). However, this is touched on in two of the supporting documents:</p> <ul style="list-style-type: none"> <li>the PAS Toolkit Q A6 <i>“Evidence indicates a need to reconsider the distribution of employment allocations across North Somerset in connection with the wider dynamics of the Functional Economic Market Area (FEMA). There may be a case for greater allocation closer to Bristol.”</i></li> <li>the Sustainability Appraisal Scoping Report at Table 11: Current and likely future Sustainability Issues in North Somerset and the role of the North Somerset Local Plan (page 44). <i>“Car-based travel”</i> is a key issue. It is recognised that <i>“A high proportion of people out-commute for employment to Bristol and surrounding areas largely by car”</i>. The potential role of the Local Plan is stated as <i>“The Plan allocations will focus on jobs and growth which would facilitate working closer to home and reduce the need for out-commuting.”</i></li> </ul>	<p><a href="#">Wraxall and Failand Parish Council Response to the West of England Joint Local Transport Plan 4 draft a.pdf</a></p> <p><a href="#">Wraxall and Failand Parish Council Response to The West of England Joint Spatial Plan 2036.pdf</a></p>

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			<p>The importance of Bristol and the area to the north of the city as key areas for employment is not fully recognised.</p> <p>Housing development in Nailsea and Backwell, in addition to further housing around Weston-super-Mare can be considered to be ‘dormitory’ developments resulting in increased commuting to Bristol, and this needs to be recognised.</p> <p>There appears to be a presumption that creating jobs and growth locally will significantly reduce the need for out-commuting. This premise appears to replicate one of the shortfalls of the JSP.</p> <p>It is unclear what form a Green Belt Assessment will take - Pre-commencement Document para 12 refers. Will it be the assessment used for the JSP, or will the JSP assessment be re-assessed and if so, what criteria will have changed and will this be subject to a consultation?</p> <p>It is requested that W&amp;F PC’s comments previously submitted on the JSP and JTS be taken into consideration when drafting the Local Plan; these are attached. W&amp;F PC support the PCAA’s response to this consultation.</p>	
Jeremy Blatchford			<p>From LGA conference tours around exemplar housing developments (Harrogate 2004) to visits with developers the concept of housing mix has been stressed with great emphasis for there to be little or no discrimination between social, affordable and other types of housing. Local experience must surely reinforce this.</p> <p>Architects and public health strategists point out the strong relationship between building communities and levels of physical and mental health. (See Health and</p>	

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			<p>Wellbeing Presentations and numerous submissions by Public Health England and the health community.)</p> <p>Your ideas appear to focus on building a large number of houses based upon forecasts that do not appear to take account of low birthrate, as pointed out by the JSNA (Joint Strategic Needs Assessment), and the complete change in immigration law arising from Brexit.</p> <p>There are references to the environment but there remains the failure to commit to an integrated stormwater plan taking into account the ten of thousands of homes being built along the River Avon. These conditions are already impacting upon developments as far upstream as Swindon. There has to be an integrated plan that takes into account rising sea levels BEFORE considering housing numbers.</p> <p>The population, health and economic aspects of COVID-19 cannot yet be ascertained, neither can the impact of the new government's economic policies. It is quite possible one could see the closure of Bristol Airport for economic reasons including the failure of more major airlines. Port of Bristol may become a Freeport and Global Warming will impact on journey distances to the Far East by the opening of North-East and/or North-West Passages.</p> <p>It is suggested that:-</p> <ol style="list-style-type: none"> <li>1. The creation of area Development Agencies to oversee the creation of balanced communities (see Swindon Borough Council, New Eastern Villages for example).</li> <li>2. All major strategic decision making involves an independent architect with appropriate strategic experience to be a part of the decision making team.</li> </ol>	

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			<p>3. Public Health are a statutory consultee on location and planning of major projects, as is openly discussed by the Health and Wellbeing Board.</p> <p>4. Timing of the housing mix is regarded as mission-critical. Arguably one needs more social housing now than later.</p> <p>5. Submissions to the Health &amp; Wellbeing Board and its predecessors have shown that the same roads, about eight of them, are responsible for most of the social inequality (North Somerset has some of the widest in Britain.). If these areas were replaced, if necessary using compulsory purchase and demolition the equality gap could become some of the lowest. It has been tried for 24 years, the time to be radical is here.</p> <p>6. The Government should be asked to defer the whole process by one year, under Emergency Powers, to ensure one is planning for a more likely future than the present one.</p>	
noel sweeney			<p>I am somewhat surprised and certainly disappointed by this Consultation Process.</p> <p>It represents a total failure where the North Somerset Planning Department have failed in letter and spirit to comply with their duty and responsibility to local residents.</p> <p>They have now opted out of such a commitment by arrogating to themselves the means of ignoring their duties to residents.</p> <p>For the past three years they have done nothing at all.</p>	

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			<p>What is the purpose of a Planning Committee that fails to take action that they are duty-bound to do?</p> <p>Their multiple-failures over the last three years proves they are unfit for that precise purpose.</p>	
Ben Moss	Rockwell House		<p>Dear North Somerset Local Plan Team</p> <p>Please find the below details as amendments and feedback to your Pre-commencement Document. Suggested text alterations are <i>in italic</i>. Changes are in order of appearance on the original document.</p> <p><u>Scope 8</u>. We have reworded scope 8 because the language used is fundamental in framing what we are creating. 'Tackling' indicates a violent response; 'Climate Change' is too passive for the challenge of the Climate Emergency and the climate breakdown that we are currently facing. The Climate Emergency and our response to it will need to frame everything we do over the coming years and decades; it is through this lens that we need to examine other scopes.</p> <p><i>The purpose of the Local Plan will be to deliver the number of homes needed for the district over the plan period including the necessary supporting facilities and infrastructure, using the lens of the climate emergency to focus on creating healthy places, addressing inequalities, and creating truly sustainable homes.</i></p> <p><u>Scope 10</u>: Strategic Policies</p>	

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			<p><b>"Addressing Climate Change:</b> Maximise sustainability, carbon reduction, renewable energy, focus on active travel and public transport, flood risk and coastal change, food production, greening. "</p> <p>Again we find the language vague. Climate Emergency is more directive than climate change. 'Greening' is a vague term, we prefer regenerative agricultural and ecological practices including rewilding, tree planting and agroforestry, and biodiversity enhancement.</p> <p>Suggested changes to:</p> <p><i>Addressing Climate Emergency: Maximise sustainability, carbon reduction, renewable energy, focus on active travel and public transport, flood risk and coastal change, food production, regenerative agricultural and ecological practices (including rewilding, tree planting and agroforestry, and biodiversity enhancement).</i></p> <p><b>"Employment - :</b> Employment land will be provided to attract investment, meet business needs to support the future economy and provide a range of job opportunities at accessible locations. Consideration of the role of the port and airport and employment in town centres."</p> <p>Again, the wording of this is not dynamic enough to the range of perspective necessary as to what employment and the economy needs to look like within the Climate Emergency. To only include 'Port and airport and town centres' is very short-sighted. The scope must also include consideration of rural employment as part of the future economy; including food production, nature conservation and regeneration, regeneration of traditional livelihoods (forestry, farming, traditional rural skills etc); as well home-based working, particularly within an ecologically generative and zero-carbon capacity.</p>	

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			<p>Suggested changes to:</p> <p><i>"<b>Employment</b> - : Employment land will be provided to attract investment, meet business needs to support the future economy and provide a range of job opportunities at accessible locations. Consideration of the role of the port and airport; employment in town centres; rural employment including food production, nature regeneration and conservation, regeneration of traditional livelihoods (forestry, farming, traditional rural skills); and home-based working"</i></p> <p>Thanks for your work in this, and look forward to hearing of progress.</p> <p>Ben Moss</p>	
Lansdown	Lansdown Land		<p>The new Local Plan should prioritise sustainable development as the key strategic outlook, reflecting the importance attributed to this by paragraph 11 of the NPPF. Doing this will ensure that development needs can be met and will also positively contribute to the three objectives of sustainable development. Given the pressures and potential consequences of Climate Change, ensuring development is sustainable is now more important than ever.</p>	
Burrington Parish Council	Burrington Parish Council		<p>Please find attached some comments and questions from Burrington Parish Council in response to consultation on the Local Plan Pre-Commencement Document.</p>	<p><a href="#">Burrington Parish Council Response to Local Plan Pre-Commencement Consultation.pdf</a></p>



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			<p>The new Local Plan is an opportunity to avoid the failings of the Joint Spatial Plan (JSP) by explicitly considering and consulting on realistic, alternative options, and clearly presenting the underlying evidence and assumptions from the start of the process.</p> <p>That is about as far as the Issues and Options consultation should go. Responses to the consultation should not be drawn into details about the future form of the plan or its proposals. For example, there should be no presumptions about land use and transport proposals, such as the future development of the airport or related proposals including the ‘South West Economic Link’ (i.e. increasing capacity on the A38 south west of Bristol) or links from the M5 (i.e. increasing capacity on the A368 corridor from a new M5 Junction 21A).</p> <p>For the Issues and Options Consultation, the Council should be clear and transparent about the issues that will need to be considered and how they will be addressed, including;</p> <ul style="list-style-type: none"> <li>• the options that will be considered;</li> <li>• the assumptions by which realistic alternative options will be defined and evaluated;</li> <li>• the evidence base that exists already from the JSP and the Joint Local Transport Plan (JLTP);</li> <li>• the need for new surveys; and</li> <li>• the form of future consultations that will take place with interested organisations like parish councils and the general public.</li> </ul> <p><b>SETTLEMENT STRATEGY AND GREEN BELT:</b></p> <p>An essential part of the settlement strategy will be a review of the general extent of the inner boundaries of the Green Belt around Bristol and other settlements. The Issues and Options Consultation should be clear about the need to review</p>	

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			<p>the general extent of the Green Belt and, in particular, its inner boundaries around Bristol and other settlements, including the need to accommodate strategic urban extensions to the City of Bristol for example at Ashton Vale.</p> <p>It is questionable whether the outer boundaries of the Green Belt also require a strategic review, as other policies are likely to be more appropriate for rural settlements and the countryside in more rural parts of North Somerset including areas bordering the Mendip Hills AONB.</p> <p>The settlement strategy should be explicit about the scope for different approaches in different settlements including the selective expansion of some existing settlements, for example: infill development only, a review of the settlement boundary and/or small site allocations (subject perhaps to neighbourhood plans) and opportunities for sustainable new settlements.</p> <p><b>HOUSING PROVISION:</b></p> <p>North Somerset Council has accepted in a number of planning appeals (including an appeal decision on land south east of Nailsea dated 29th November 2019) that it could not demonstrate a five-year supply of housing land. In that case, the agreed supply was 4.4 years, consistent with the Council's Residential Land Survey and Five Year Supply Position Statement of April 2019.</p> <p>One consequence of the coronavirus crisis is that there is uncertainty about how the Government will proceed with its policies for housing land supply. What is the current position in North Somerset, taking account of commitments since the last update in April 2019 to include sites subsequently granted permission on appeal?</p>	

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			<p>If there is still a problem with the five-year supply of housing land, would it not be better for the Council to undertake a partial review of the Site Allocations Plan (SADPD) to establish a five-year supply of housing land (to 2025) before completing the New Local Plan? A partial review could also include any other proposals that require the urgent backing of an adopted development plan. It could also form the basis for new Neighbourhood Plans and reviews of existing Neighbourhood Plans.</p> <p>To demonstrate a five-year supply of housing land and to carry full weight in planning appeals, a partial review of housing sites would need to be incorporated in an adopted development plan. It would also be necessary to make clear through the plan's examination that the Council was seeking to confirm the existence of a five-year supply in a recently adopted local plan, taking account of housing requirements and supply, criteria of deliverability and the Housing Delivery Test.</p> <p>Following examination, the Inspector's report would then provide recommendations to help the Council confirm that they have a five-year land supply of housing land in a recently adopted plan. In following years, the Council would confirm a five-year housing land supply through an Annual Position Statement, avoiding the need to revisit its analysis in successive planning appeals.</p> <p>The aim would be to achieve adoption of an interim plan/partial review within 12 to 18 months, leading on to a longer-term strategy in the New Local Plan. The partial review of the SADPD would not be a long-term spatial strategy but would be flexible enough to be compatible with a variety of longer-term options.</p> <p>The background evidence for a partial review of the SADPD and for a New Local Plan would include an updated Strategic Housing Market Area</p>	

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			<p>Assessment (SHMAA), based on the standard method for assessing housing requirements, and an updated Strategic Housing Land Availability Assessment (SHLAA), following a call for sites and an agreed methodology for assessing sites as either:</p> <p>(a) consistent with policy; or</p> <p>(b) worthy of consideration in an updated policy; or</p> <p>(c) rejected as unsustainable.</p> <p>It would be impossible for a partial review of the SADPD to include Green Belt sites in advance of a comprehensive, strategic review of the Green Belt that identifies where ‘exceptional circumstances’ justify the alteration of Green Belt boundaries, primarily because of the need to promote sustainable patterns of development.</p> <p>A comprehensive strategic review of Green Belt will also need to be associated with:</p> <ul style="list-style-type: none"> <li>• a comprehensive review of locational strategy (taking account of development for employment and other uses); and</li> <li>• a settlement strategy (identifying the future roles of settlements to reflect their locations, sizes, facilities, and environmental constraints, etc.); linked with</li> <li>• an appropriate transport strategy (covering all modes).</li> </ul> <p>Green Belt Review will require the adoption of a New Local Plan. In an interim plan/partial review, it will be necessary to demonstrate that proposals do not constrain a New Local Plan and contain sufficient flexibility to be associated with a variety of longer-term options.</p>	

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			<p>Could a partial review of the SADPD identify enough potential housing sites outside the Green Belt to provide a five-year supply of housing land for adoption in an interim plan? The Issues and Options consultation should address that question.</p> <p>TRANSPORT PROPOSALS:</p> <p>In relation to transport proposals, the Issues and Options Consultation must explain how proposals in the Joint Transport Study and the recently adopted JLTP reflect assumptions about future development and how the JLTP will respond to new land-use proposals in the Local Plan. For example, the JLTP proposes major improvements to the A38 between Langford and South Bristol and major changes to the A368 between its junction with the A38 and a new Junction 21A on the M5.</p> <p>The JLTP states, in relation to the A368 corridor (page 76): ‘The scheme will improve links to the airport and improve resilience of the Strategic Road Network and locally will improve access to potential housing &amp; residential growth.’ To what extent are the proposals in the JLTP justified by and dependent on assumptions about future housing development on these corridors and assumptions about the expansion of the airport? Do they pre-judge proposals in the local plan and decisions about planning applications by the airport?</p> <p>THE AIRPORT:</p> <p>For the airport, options to be considered must reflect different scales of operation (expressed in passenger and flight numbers, peak road traffic flows, car parking provision and physical development on the site etc.) compared with the existing baseline situation (9 mppa) and the commitment of growth to 10 mppa. These options should be evaluated in terms of their environmental</p>	

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			<p>impacts, including implications for flights, surface access, highways, physical development, and car parking.</p> <p>The current proposal for expansion to 12 mppa (an increase of 33% from the current figure of 9 mppa) and the scenario of continuing growth to 20 mppa (an increase of 222%) should be compared with the current position as well as the commitment to 10 mppa, in terms of flight numbers and road traffic.</p> <p>A rigorous approach to the estimation of uncertain economic benefits is essential, to ensure that they are correctly balanced against the very tangible environmental costs of additional flights, growth in road traffic, physical expansion of the airport and the related demand for car parking. Such an approach should address the question posed by Liam Fox MP:</p> <p><i>‘What is a reasonable limit for expansion that will ensure, on one hand, the viability of the airport and potential support for the local and regional economy without, on the other, creating undue pressure on the local environment and its population?’</i></p> <p>OTHER QUESTIONS:</p> <p>The Pre-Commencement Document states that site allocations ‘will be set out in a nonstrategic section of the plan’. Will the more detailed, non-strategic policies be published at the same as the strategic policies? If not, what will be the sequence for public consultation?</p> <p>Following withdrawal of the Joint Spatial Plan, related documentation will be removed from the public domain. However, some of the evidence base for the JSP will also be relevant to the new Local Plan. Will data from studies related to the JSP that are relevant to the Local Plan be re-published with the Issues and Options Consultation?</p>	

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			<p>Will an updated SHLAA and SHMAA be published before the Issues and Options Consultation?</p> <p>Will Parish Councils be consulted on the procedures for public consultation and will North Somerset Council engage in the process through open public meetings, which were denied as part of the JSP process - when the coronavirus lockdown is lifted?</p> <p>Will other interactive opportunities be provided online if the coronavirus lockdown is still in place? Will the consultation programme be halted until public engagement can take place?</p> <p>Is the timetable for consultation on Issues and Options in May-June 2020 still realistic, in view of the fact that consultation on the Pre-Commencement Document only closes on 22 April 2020 and the coronavirus lockdown has prevented meetings of parish council and other organisations?</p>	
Highways England	Highways England		<p>Highways England welcomes the opportunity to comment on the North Somerset Local Plan Pre-Commencement Document for the new local plan period 2023 to 2036.</p> <p>As you will be aware we are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which in the Plan area comprises the M5 junctions 19, 20 and 21. In addition, though being in neighbouring Districts, M5 J18 and 18A (Bristol) and M5 J22 (Sedgemoor) are SRN junctions and routes also potentially affected by development in North Somerset. It is on the basis of these responsibilities that Highways England has provided the comments that follow in this letter.</p>	

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			<p>Highways England is keen to ensure that transport and land use planning policy is closely integrated and that the network is able to deliver sustainable economic growth. In this respect, Highways England draws your attention to “The Strategic Road Network - Planning For The Future - A Guide To Working With Highways England On Planning Matters”, Highways England’s Licence issued by DfT and DfT Circular 02/2013, which sets out how we will engage with the planning system to deliver sustainable development.</p> <p>We are interested in the potential traffic impacts on the SRN of any development site proposals and/or policies coming forward through the Local Plan process and need to ensure that these are fully assessed during the plan-making stage. It is imperative to identify any necessary infrastructure improvements or interventions needed to safely and sustainably deliver growth aspirations at this early stage, as set out in Government policy and the Circular 02/2013.</p> <p>The Pre-commencement document sets out the new Local Plan’s scope, methodology and programme. We have read the document and are content with the scope and the timescales involved. We note that a consultation on the Issues and Options (Regulation 18) is expected to be forthcoming in mid-2020.</p> <p>We welcome the document’s reference to delivering the necessary infrastructure along with the numbers of homes and supporting facilities needed in the district over the plan period and we note that transport infrastructure proposals will be identified within the Infrastructure strategic policy.</p> <p>We note the intention for a transport impact assessment of the proposed allocations and an Infrastructure Delivery Plan (IDP) to be included in the evidence base for the new Local Plan. We would expect the transport Evidence Base to include a quantified assessment of the motorway junctions’</p>	



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			<p>performance which includes traffic volumes, queues and delays and the resultant changes arising from the new Local Plan allocations. We have already had the opportunity to discuss with the Council's consultants a new North Somerset traffic model that has been developed from the Highways England South West Regional Traffic Model for the purpose of assessing the new Local Plan. We look forward to ongoing liaison through the development of the scope and methodology of the transport assessment for the transport evidence base so that we can offer support and information where appropriate.</p> <p>The document makes reference to preparing and maintaining a Statement of Common Ground (SoCG) as part of the duty to cooperate on planning issues that cross administrative boundaries. We would strongly encourage the Council to also prepare and maintain a Statement of Common Ground with Highways England.</p> <p>We trust that our response will be helpful and assist you with your Local Plan review and we look forward to working with you as the Plan progresses. If you require further clarification on any issues, please do not hesitate to contact me.</p>	
Churchill Parish Council	Churchill Parish Council		<p>1. <b>North Somerset Local Plan and West of England Joint Spatial Plan (JSP):</b>  This new local plan is an exciting opportunity to embrace future growth in North Somerset whilst at the same time rejecting the failings of the previously-proposed Joint Spatial Plan (JSP).  The Inspectors' main concerns were focussed on the spatial strategy and allocation of Strategic Development Locations (SDLs). As a parish we agree that a spatial strategy with transportation at its core should be a key first step.</p>	

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			<p>2. <b>Evidence for Issues and Options consultation:</b>  The JSP contained extensive investigations which remain pertinent to the preparation of future local plans. We strongly urge that you make the Issues and Options documentation fully open and transparent and ensure that the evidence collected, as well as that relating to transport modelling, is detailed and clearly presented. Furthermore, the evidence about land use assumptions that were used for the analysis and proposals of the Joint Local Transport Plan should also be made clear.</p> <p>3. <b>Climate Change:</b>  We would urge that the Climate Change Emergency declared by North Somerset Council (26<sup>th</sup> February 2019) to go Carbon Neutral by 2030 must now be taken into account in the new Local Plan (see below).</p> <p>4. <b>Green Belt Review:</b>  The current state of Climate Emergency runs contrary to the patterns of development that are likely to emerge if no review is undertaken of the green belt. In order to reduce carbon emissions through reduced car use, houses must be built closer to employment and public transport. That means that land from the Green Belt surrounding Bristol should be given up for development in order to avoid simply forcing development to jump an extra 10 miles into the countryside beyond. We would question whether it is realistic to progress to Issues and Options consultation in May/June prior to carrying out a comprehensive Green Belt Review.</p> <p>5. <b>Employment and Housing:</b>  A notable feature of North Somerset is that employment opportunities are concentrated in Bristol. New housing should therefore be concentrated in locations close to the jobs in Bristol.</p>	

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			<p>6. <b>Remote Strategic Development Locations (SDLs):</b> Such SDLs as Churchill/Mendip Spring, as proposed in the JSP, would be unsustainable and inappropriate since they amplify the energy expenditure required for commuting and should not be included in any future Local Plan. The proposed SDL at Churchill is an extreme example of these highly problematic locations.</p> <p>7. <b>Infrastructure – Transport:</b> The primary aim of a new spatial and transport plan must be to greatly reduce energy expenditure, much of which is devoted to transport by a greater focus on public transport. More energy-efficient transport modes including a greatly expanded rail service, should be sought. We believe that efficient and regular bus and train services should form the cornerstone to any new local plan – something that is lacking any meaningful detail the current draft Joint Local Transport Plan. The recent rejection by North Somerset Council of the Bristol Airport Expansion proposals should impact on future infrastructure requirements.</p> <p>8. <b>Environmental and historic conservation and enhancement:</b> Churchill Parish fully supports the Pre-Commencement document #10 “<i>Protection and enhancement of landscapes, wildlife and historic assets, strategic green infrastructure, Mendip Hills AONB</i>”</p> <p>9. <b>Public Consultation:</b> We are concerned that public involvement for this Pre-commencement consultation and for the forthcoming Issues and Options in May/June is going to be extremely challenging given current circumstances. We would recommend that North Somerset Council review the timetable for the consultations</p> <p>10. <b>Speculative Development:</b> While we are pushing for better consultation we also acknowledge that speedy plan approval is</p>	

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			<p>necessary to fill the regulatory void, given that the shortfall in housing delivery is being exploited by developers making speculative applications in unsuitable locations. While we are working on a neighbourhood plan which will help to control and channel development in our parish, we are conscious that this will take a time to approve. We would therefore be pleased if we could discuss short term site allocation in the parish pending the completion of your local plan or our neighbourhood plan.</p> <p>We very much look forward to engaging with North Somerset during the plan-making process and remain available to consult or respond to questions or queries.</p>	
Sport England	Sport England		<p>Sport England is the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that <b>Sport England is a statutory consultee on planning applications affecting playing fields.</b></p> <p>The new Sport England Strategy 'Towards An Active Nation' (2016-21) identifies key changes in the delivery of the strategy:</p> <ul style="list-style-type: none"> <li>• <b>Tackle inactivity:</b> more money and resources</li> <li>• <b>Invest in children and young people</b> to build positive attitudes to sport and activity</li> <li>• <b>Help those currently active to carry on</b>, but at a lower cost to the public purse</li> <li>• Put <b>customers at the heart</b> of what we do/be <b>welcoming and inclusive</b></li> </ul>	

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			<ul style="list-style-type: none"> <li>• Help sport to keep pace with the <b>digital expectations</b> of customers</li> <li>• <b>Encourage stronger local collaboration</b> to deliver a joined up experience for customers</li> <li>• Working with a <b>wide range of partners</b>, using our expertise and investment to align</li> <li>• Applying <b>behaviour change</b> principles to encourage innovation to share best practice</li> </ul> <p>Sport England has assessed this consultation in the light of Sport England’s <b>Planning for Sport: Forward Planning</b> guidance  <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport</a></p> <p>The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:</p> <p><b>PROTECT</b> sports facilities from loss as a result of redevelopment</p> <p><b>ENHANCE</b> existing facilities through improving their quality, accessibility and management</p> <p><b>PROVIDE</b> new facilities that are fit for purpose to meet demands for participation now and in the future.</p> <p>Sport England believes that sport has an important role in modern society and in creating sustainable and healthy communities. Sport and physical activity is high on the Government’s national agenda as it cuts across a number of current topics that include health, social inclusion, regeneration and anti social</p>	

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			<p>behaviour. The importance of sport should be recognised as a key component of development plans, and not considered in isolation.</p> <p>The following comments are provided within the context of:</p> <ul style="list-style-type: none"> <li>• The National Planning Policy Framework (MHCLG, 2019).</li> <li>• Sport England’s Planning for Sport webpages (2020)  <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport</a></li> </ul> <p><b><u>1. Local Plan &amp; Evidence Base</u></b></p> <p>The National Planning Policy Framework (MHCLG, 2018) states:</p> <p style="padding-left: 40px;">96. <i>Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.</i></p> <p>Sport England’s view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches.</p> <p>We raise concern that there does not appear to be a robust and up to date evidence base for sport and recreation for North Somerset. We are, however,</p>	

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			<p>aware that there is a Playing Pitch Strategy in development. If adopted and prepared in the last 3 years they could be referenced as part of the evidence base for the Local Plan.</p> <p>For sport buildings and land that are not playing pitches (swimming pools, tennis courts, athletics tracks etc) there should also be a wider Sport Strategy including swimming pools, sports halls and other non playing pitch sports. Sport England has produced a final technical guide for Assessing Needs &amp; Opportunities (ANOG) regarding sport to accompany the NPPF (as referenced on the MHCLG website).</p> <p><a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</a></p> <p><b>2. <u>Planning Obligations/Community Infrastructure Levy (CIL) to Sport</u></b></p> <p>Sport England supports use of planning obligations (s106)/community infrastructure levy (CIL) as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. This does need to be based on a robust NPPF evidence base. This includes indoor sports facilities (swimming pools, sports halls, etc) as well as playing fields and multi use games courts.</p> <p>All new dwellings in North Somerset in the plan period should provide for new or enhance existing sport and recreation facilities to help create opportunities for physical activity whilst having a major positive impact on health and mental wellbeing.</p> <p><b>The evidence base as mention in (1) above should inform the Infrastructure Funding Statement (IFS) and how CIL is spent.</b> We need to be mindful of s106/CIL regulations that have changed and Sport England will be shortly</p>	

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			<p>updating its CIL / Planning Obligations note <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/community-infrastructure-levy-and-planning-obligations-advice-note">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/community-infrastructure-levy-and-planning-obligations-advice-note</a></p> <p><b><u>3. Protection of Sport &amp; Recreation including playing fields</u></b></p> <p>Sport England acknowledges that the NPPF is promoting “sustainable development” to avoid delays in the planning process (linked to economic growth). That said, the NPPF also says that for open space, sport &amp; recreation land &amp; buildings (including playing fields):</p> <ul style="list-style-type: none"> <li>97. <i>Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</i></li> <li>98. <i>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</i></li> <li>99. <i>b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i></li> <li>100. <i>c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</i></li> </ul> <p>Sport England would be very concerned if any existing sport &amp; recreation land &amp; buildings including playing pitches would be affected by these proposals without adequate replacement in terms of quality, quantity, accessibility, management &amp; maintenance and prior to the loss of the existing facility.</p> <p><b><u>4. Active Design</u></b></p> <p>Sport England along with Public Health England have launched our revised guidance ‘<b>Active Design</b>’ which we consider has considerable synergy the Plan.</p>	



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			<p>It may therefore be useful to provide a cross-reference (and perhaps a hyperlink) to <a href="http://www.sportengland.org/activedesign">www.sportengland.org/activedesign</a> . Sport England believes that being active should be an intrinsic part of everyone’s life pattern.</p> <ul style="list-style-type: none"> <li>• The guidance is aimed at planners, urban designers, developers and health professionals.</li> <li>• The guidance looks to support the creation of healthy communities through the land use planning system by encouraging people to be more physically active through their everyday lives.</li> <li>• The guidance builds on the original Active Designs objectives of <i>Improving Accessibility, Enhancing Amenity and Increasing Awareness (the ‘3A’s)</i>, and sets out the Ten Principles of Active Design.</li> <li>• Then Ten Active Design Principles have been developed to inspire and inform the design and layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and physical activity and active lifestyles.</li> <li>• The guide includes a series of case studies that set out practical real-life examples of the Active Design Principles in action. These case studies are set out to inspire and encourage those engaged in the planning, design and management of our environments to deliver more active and healthier environments.</li> <li>• The Ten Active Design Principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design.</li> </ul> <p>The <b>developer’s checklist</b> (Appendix 1) has been revised and can also be accessed via <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</a></p>	

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			<p>Sport England would encourage development in North Somerset be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist.</p> <p><b>Model Policy for Active Design</b></p> <p>A suggested model policy for Local Plans and Neighbourhood Plans is set out below:</p> <p><b>The design and masterplanning of development proposals will embrace the role they can play in supporting healthy lifestyles by facilitating participation in sport and physical activity. To do so they will, as far as is relevant to the specific development proposal, adhere to the following Active Design principles:</b></p> <ul style="list-style-type: none"> <li>• <b>Activity for All</b> – <i>Enabling those who want to be physically active whilst encouraging those who are inactive to become active.</i></li> <li>• <b>Walkable Communities</b> – <i>Creating the conditions for active travel between all locations.</i></li> <li>• <b>Connected Walking, Running and Cycling Routes</b> – <i>Prioritising active travel through safe integrated walking, running and cycling routes.</i></li> <li>• <b>Co-Location of Community Facilities</b> – <i>Creating multiple reasons to visit a destination and minimising the number and length of trips and increasing the awareness and convenience of opportunities to participate in sport and physical activity opportunities.</i></li> <li>• <b>Network of Multifunctional Open Space</b> – <i>Providing multi functional spaces open up opportunities for sport and physical activity and has numerous wider benefits.</i></li> </ul>	

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			<ul style="list-style-type: none"> <li>• <b>High Quality Streets and Places</b> – <i>Well designed streets and spaces support and sustain a broader variety of users and community activities.</i></li> <li>• <b>Supporting Infrastructure</b> – <i>Providing and facilitating access to facilities and other infrastructure to enable all members of society to take part in sport and physical activity.</i></li> <li>• <b>Active Buildings</b> – <i>Providing opportunities for activity inside and around buildings, rather than just between buildings.</i></li> <li>• <b>Management and Maintenance</b> – <i>A high standard of maintenance is essential to ensure the long term attractiveness of sports facilities along with open and public spaces.</i></li> </ul> <p>Active Design should be demonstrated in the major housing sites in the plan period.</p> <p>To bridge the gap between the high-level principles of <b>Active Design</b> and delivery in practice, we have worked with the Building Research Establishment (BRE) to link the overarching <b>Active Design</b> principles with the individual scheme criterion in each of the BRE Environmental Assessment Methodology (BREEAM) family of schemes, including HQM, Communities and CEEQUAL. <a href="#">This document</a> has been produced to help illustrate how active design can be implemented in developments in a practical way through the application of the BREEAM family of schemes. This mapping between the BREEAM schemes and our <b>Active Design</b> principles makes it easier for developers, planners and other stakeholders in the sector to understand and deliver the principles in practice – thereby creating healthy, vibrant and active neighbourhoods and communities for the future.</p> <p>The work can be used to build on the guidance to provide specific and consistent technical standards that demonstrate the benefits of <b>Active Design</b> and sustainability more broadly.</p>	

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			<p>We are starting to see <b>Active Design</b> being used more across the different elements of planning but also by a range of parties – design codes (Essex Design Guide) to on ground delivery and activity – case studies at <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design">https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</a></p> <p><b><u>5. Community Use of Education Sites</u></b></p> <p>Making better use of existing resources contributes to sustainable development objectives by reducing the need for additional facilities and the potential loss of scarce resources such as open space. The practice of making school sports facilities available to wider community use is already well established and has been government policy for many years, but there are further opportunities to extend this principle within the education sector through programmes such as Academies and to other privately owned sports facilities, to help meet the growing demand for more and better places for sport in convenient locations.</p> <p><b>Sport England promotes the wider use of existing and new sports facilities to serve more than one group of users. Sport England will encourage potential providers to consider opportunities for joint provision and dual use of facilities in appropriate locations.</b></p> <p>Sports facilities provided at school sites are an important resource, not just for the school through the delivery of the national curriculum and extra-curricular sport, but potentially for the wider community. There are also direct benefits to young people, particularly in strengthening the links between their involvement in sport during school time and continued participation in their own time. Many children will be more willing to continue in sport if opportunities to participate are offered on the school site in familiar surroundings. Many schools are already well located in terms of access on foot or by public transport to the local community and so greater use of the sports facilities outside normal school</p>	

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			<p>hours should not add significantly to the number of trips generated by private car.</p> <p><i>Use Our School</i> is a resource to support schools in opening their facilities to the community and keeping them open. It provides tried and tested solutions, real life practice, tips from people making it happen, and a range of downloadable resources. <a href="https://www.sportengland.org/news/use-our-school-launches">https://www.sportengland.org/news/use-our-school-launches</a></p> <p>Sport England would encourage a positive for sport approach Local Plan Policy to enable the existing and future users opportunity to take part in recreational activities that meet social, health and wellbeing agendas.</p>	
Eve88			<p>Response to North Somerset Local Plan (2023-2038) Pre-commencement Document</p> <p>From J Lyons</p> <p><b>West of England Joint Spatial Plan</b></p> <p>The West of England Joint Spatial Plan (JSP) was found by the Inspectors to be so deeply flawed that it had to be withdrawn. The choice of Strategic Development Locations (SDLs) and in particular remote SDLs such as Churchill/Mendip Spring were criticised for not being able to demonstrate a housing need in the location. The Examination was halted before Churchill/Mendip Spring was examined in detail but the evidence would have shown that to build 2,800 new houses at Churchill, 15 miles from Bristol with no proposed public transport, would have been unsustainable and undeliverable.</p>	

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			<p>The new Local Plan will also be examined by Government Inspectors therefore it cannot simply repeat the rejected JSP plans or it too will be rejected by the Inspectors.</p> <p><b>Housing Need</b></p> <p>A new local plan is an opportunity to think again; to build houses where there is a housing need near to employment (Bristol), public transport and the provision to cycle or walk to work.</p> <p><b>Green Belt Review</b></p> <p>Without a Green Belt review, in particular the land adjacent to Bristol that is strangling the city, North Somerset Council will not be able to make house and road building plans that adhere to its commitment to a Climate Change Emergency to be carbon neutral by 2030. This GB review is needed before further work is carried out on the Local Plan.</p> <p><b>Climate Change</b></p> <p>To put the Climate Change Emergency commitment (26 Feb 2019) at the heart of every decision made by North Somerset Council should deliver a Local Plan where new houses are not built in locations that will massively increase car commuter traffic and that will protect productive agricultural land from unsustainable house building in the wrong place.</p> <p><b>Environmental Conservation</b></p> <p>To create a good and healthy place to live we need to reduce commuter journeys, look after the Mendip Hills AONB and surrounding area for the</p>	

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			<p>benefit of everyone, and keep airline flights to the daytime to allow everyone a peaceful night.</p> <p>21 April 2020</p>	
Jan Murray	CALRAG		<p>Response to North Somerset Local Plan: Pre-commencement Document (MARCH 2020)</p> <p>Mrs Jan Murray. 21.04.2020</p> <ol style="list-style-type: none"> <li>1. It is vital that the mistakes and errors that caused the North Somerset contribution to the JSP are learned from and not repeated. The Inspectors rejected the JSP. They highlighted the lack of a proper spatial strategy. They noted particular concerns regarding the selection of Strategic Development Locations. This new Local Plan presents an exciting opportunity to learn from the previous errors and develop a new and exciting future recognising the specific cultural differences between village and town life.</li> <li>2. North Somerset must be open and transparent in all aspects of the new Local Plan. All data used as evidence for proposed land use must be detailed and clearly presented with references to the relevant sources. This was lacking in the JSP.</li> <li>3. I fully support bullet #2 of section 10 of the Pre-commencement document regarding <b>Addressing Climate change</b>.</li> <li>4. <b>Transport:</b> Now that North Somerset Councillors have rejected the application for expansion of Bristol Airport, and the current National Climate Change Emergency has been accepted, new and detailed transport modelling must be carried out to re-evaluate the need for new roads that are proposed within the JLTP 4. The evidence must be</li> </ol>	<p><a href="#">Jan M's Response to North Somerset Local Plan.docx</a></p>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>detailed, clearly presented with relevant data sources given. Transport is a key issue and should be kept in line with proposed development. Public transport is essential. Professor Paul Cheshire – Government advisor - is quoted as saying that new housing development should be situated within 10 minutes walking distance of train stations.</p> <ol style="list-style-type: none"> <li>5. <b>Green Belt:</b> There should be a full and comprehensive review of the Green Belt to ensure that the Climate Change Emergency declared by North Somerset Council and nationally adopted lies at the heart of the Local Plan.</li> <li>6. <b>Remote Strategic Development locations</b> (SDLs) should not be considered before the above review of the Green Belt has been appropriately carried out. The JSP Inspectors acknowledged that there were ‘exceptional circumstances’ for Green Belt land to be used. Furthermore, North Somerset did not designate ‘safeguarded land’ between the urban area of Bristol and the Green Belt. Thus it does not comply with NPPF Par 85 when setting the current Green Belt boundary which leaves clear reasons for ‘exceptional circumstances’ to exist for development on the Green Belt that is so badly strangling Bristol.</li> <li>7. The demand for houses is fuelled by the employment needs of Bristol.</li> <li>8. I fully support bullet #9 of section 10 of the Pre-commencement document regarding <b>strategic gaps between or within settlements</b>.</li> <li>9. I fully support the Pre Commencement document bullet #10 of section 10 regarding <b>Environment and historic conservation and enhancement</b>.</li> <li>10. <b>The timetable for the Issues and Options consultation is unrealistic.</b> It is hard to believe that all the responses to this Pre-Commencement consultation could possibly be considered and</li> </ol>	



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			<p>influence the proposals to be put forward in the Issues and Options consultation. This is particularly pertinent as a result of the current Covid-19 pandemic when even Parish Councils cannot meet. Please set out a realistic timetable.</p> <p>11. I am concerned at the current level of opportunistic large planning applications in totally inappropriate places particularly outside the boundaries of rural villages. This not only leads to bad planning but also over-stretched planning departments and is contraindicated for the mental health of residents who care deeply about their environment. The feeling is that North Somerset would have a 5- year rolling housing land supply if it had carried out a review of the Green Belt and carefully considered the development that could take place on the boundary of Bristol where the transport infrastructure is in place or could be in place within a short period.</p> <p>End</p>	
J Porter	Windwhistle Primary School		<p>Having looked through the North Somerset Local Plan, it does look to be a well thought out plan in response to the local area need and, I imagine, central government requirements. As a resident of Milton, Weston, my general concern is that the vast number of commuting journeys involve getting on to the M5 to go to work in mainly Bristol (a few do go South). On the occasion of having to travel early in the morning it is readily apparent that the road infrastructure is just not capable of sustaining the traffic of today. So to plan to increase housing in the Weston area and the surrounding villages will require a solution in the medium term. These days most families buying a new house in Weston will have at least two cars for getting to work - build 4,000 new houses could mean in excess of 6,000 cars hitting the pinch points near the motorway. In my view the calibre of work (HNC/degree level) is just not available in any</p>	

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			<p>discernible numbers in the Weston area. If one excludes employment in education, NHS and local government, there is clearly not much to attract well educated and degree level talent. As a result the cheaper homes in Weston will continue to house overspill from Bristol, Portishead and Clevedon as house prices outstrip peoples' ability to buy in those areas. In an ideal plan the infrastructure (transport and quality employment) should come before yet more housing. As an ex-farmer, it would appear that the new cash crop is houses and supermarkets for people. We need a more than that. The local hospital is not suitable for the existing population and there is now no A&amp;E overnight. Doctors surgeries are becoming more and more restrictive especially to the old and infirm as they appear to be more concerned with consulting on line (where the elderly struggle to venture). Strange arrangements different from practice to practice, in effect, prevent access to appointments in a reasonable time.</p> <p>I realise that building houses makes money (for landowners and developers) but we should get the whole living environment in order to accept the new inhabitants of these houses at the same time as the houses go up.</p>	
Harrow Estates	Harrow Estates		<p><b>Land at Failand, Bristol, BS8</b></p> <p><u>Introduction</u></p> <p>This representation document has been completed by Harrow Estates in response to North Somerset Council's consultation on the Pre-Commencement Document (March 2020). Harrow Estates control a 49 hectare site in Failand which is being promoted as a Strategic Development Location. The site is capable of delivering up to 800 dwellings, a 2 form entry primary school, a local centre and a park and ride / park and choose facility.</p>	

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			<p><u>General Comments on Pre-Commencement Document</u></p> <p>Harrow Estates fully supports North Somerset Council’s decision to proceed with a Local Plan following the withdrawal of the West of England Joint Spatial Plan (JSP). Whilst the ambitious timeframe for the preparation and adoption of the plan is welcomed, we have reservations about the achievability of the target adoption date in January 2023. Whilst it is acknowledged that the Council is not commencing the plan preparation from a standing start, owing to the recent JSP examination, the extent to which the Inspectors identified concerns with the JSP approach would indicate that a fresh start is required. Furthermore, since the publication of the timetable, we have entered a period of uncertainty in the economy as a result of the coronavirus lockdown. Whilst we are still waiting to discover the full implications of this, it would be logical to assume that delays in plan making will result.</p> <p>The Inspectors’ letter to the JSP authorities on 11th September 2019 provided some guidance on how the issues raised could be addressed. It was suggested that an appropriate way forward would be <i>“a high-level spatial strategy for the plan area which, not based on specific SDLs, identifies how housing, employment and other development should be broadly distributed”</i>. We consider this to be the sensible starting point and would need to be formulated in combination with BANES, Bristol City Council and South Gloucestershire to ensure a consistent approach is adopted and the duty to cooperate can be discharged. It is important that, in the interest of achieving the local plan timeframe, the effective engagement with neighbouring authorities on the key matters of the spatial strategy and housing numbers commences immediately. It would also be sensible for an aligned strategy for the West of England is subject of public consultation across all authorities. Elsewhere in the country we have seen the effect on local plan timeframes where the duty to cooperate has not been met, with Oxfordshire being the prime example. Agreement between the</p>	

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			<p>authorities at the outset is critical in ensuring the timely preparation of local plans with cross boundary implications.</p> <p>In formulating the strategy, we would like the Council to have regard to the numerous representations made during the JSP examination. Of particular importance is the issue of housing numbers across the West of England and the apportionment of these numbers between the authorities. Barton Willmore made representations and appeared at the examination on behalf of a consortium of developers (Including Redrow / Harrow Estates) on the issue of housing numbers. The evidence put forward was robust in outlining an actual requirement of circa 140,000 new dwellings for the period 2016 to 2036. It is anticipated that similar levels of growth will be required across the West of England for the period 2018 to 2038.</p> <p>Within the list of evidence base documents to be prepared by the Council, the inclusion of a Green Belt Assessment is welcomed. Green Belt release is considered necessary to facilitate the delivery of strategic allocations in the most sustainable locations in North Somerset, many of which lie close to Bristol, including Failand.</p> <p><b><u>Sustainability Appraisal Scoping Report</u></b>  This section has been structured around the five questions set out in the document:</p> <ol style="list-style-type: none"> <li>1. Have all relevant plans and programmes been referenced?</li> <li>2. Is any significant environmental, social or economic data missing or misrepresented?</li> </ol>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>3. Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan document?</p> <p>4. Do you agree with the proposed Sustainability Appraisal Framework?</p> <p>5. Is the proposed methodology for the next stages of the Sustainability Appraisal correct?</p> <p><u>Question 1 - Have all relevant plans and programmes been referenced?</u> No comments</p> <p><u>Question 2 - Is any significant environmental, social or economic data missing or misrepresented?</u> Paragraph 2.3 outlines a range of issues to be addressed in the Local Plan, each falling into the categories Economic, Social and Environmental. We consider that issue 5 <i>'Meeting communities' needs for well-designed/ energy efficient housing, including affordable housing</i> should be expanded to include needs in respect of local services and facilities in existing communities. It is important that both existing and new communities have an appropriate balance of uses to enable it to be considered genuinely sustainable.</p> <p>Furthermore, issue 12 <i>'Reduce the need to travel by car'</i> should also be expanded to include reference to the need for appropriate growth to support and sustain public transport opportunities. This is critical for North Somerset given that 24% of the working population travel to work in Bristol or elsewhere in South Gloucestershire with 74% of work journeys undertaken by car / van (paragraph 3.36). The percentage of people across the whole of North Somerset is only 5.5% against a UK average of 16.4% (paragraph 3.37).</p>	

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			<p>The strategic location of development on existing public transport routes is therefore a fundamental prerequisite of any robust strategy in North Somerset. It is noteworthy that the JSP representations made by Stagecoach Bus identified that the SDL's at Banwell and Churchill would be "entirely car dependent from the outset".</p> <p>The idea of proximity to Bristol was explored further by Stagecoach at the JSP examination (Reference M4/58); <i>"Set against these fundamental concerns and doubts, there seems little doubt that a range of potential strategic sites adjoining or close to the Bristol Urban Area, could technically deliver new homes in locations that would represent a much more deliverable and sustainable pattern of development than many of the SDLs already selected, and at the very least, could represent more robustly deliverable sources of housing supply over the plan period. Such locations could benefit from key sustainable transport infrastructure and services already in place, often on existing strong interurban bus corridors, or where it could be relatively much more cost-effectively provided; or both"</i>.</p> <p><u>Question 3 - Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan document?</u></p> <p>Table 11 of the SA Scoping Report identifies 'Inequality' as being one of the sustainability issues and specifically the need for <i>"better and more sustainable access to jobs, services, facilities and amenities for all"</i>. Whilst this is certainly not disputed, it is important to acknowledge that the need for such accessibility is not limited to those areas with higher levels of deprivation. There are areas of the district with lower levels of deprivation with lower levels of accessibility to services, particularly for the elderly, the less mobile or people who do not drive a car.</p>	

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			<p>The absence of reference to Green Belt in table 11 is welcomed as the sustainability of sites and areas needs to be undertaken on a ‘policy off’ basis to ensure sites and locations are assessed objectively. In this regard, we consider the schedule of evidence base documents to be undertaken by the Council needs to be extended to include a landscape assessment as a separate document to the Green Belt assessment.</p> <p><u>Question 4 - Do you agree with the proposed Sustainability Appraisal Framework?</u></p> <p>We consider that the SA Framework Objectives matrix at table 12 needs to be amended at 2.1 ‘Boost delivery and meet the housing need identified within the plan period’. This is marked on the table as being a social issue but we believe that this should also be relevant to economic given the signify cant boost to the local economy in both construction and operational phases. Furthermore at 2.3 ‘Achieve reasonable access to a wide range of community, educational, town centre and healthcare facilities’ should be included as an environmental issue because appropriate location of uses can reduce the need for journeys to be undertaken by private car.</p> <p><u>Question 5 - Is the proposed methodology for the next stages of the Sustainability Appraisal correct?</u></p> <p>Broadly, yes we are in agreement with the Council’s outline of the next steps. However, there has been no reference within either the Pre-Commencement Document or the Sustainability Appraisal Scoping Report to a call for sites consultation. We consider that it is essential for this stage of the process to ascertain the sites that are available for development.</p>	
Nigel Bennett (Magenta)	Magenta Planning		<p>On behalf of the freehold owners of <b>No3 Main Road (together with associated rear land), Cleve</b>, we confirm that we wish to be formally involved with this</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>process. As you will be aware, we have been making representations on this same matter over the last 3 to 4 years, in respect of promoting a proposed housing allocation at this site.</p> <p>The case for this allocation remains the same, albeit it is now significantly more pressing given the delays experienced with the Local Plan process and in light of the Council's fragile position with its 5 year housing land supply. Going forward, we will therefore wish to continue to promote our case for the delivery of housing at this land.</p> <p>Our only comment on your scope at this stage is that it is not clear whether your strategic and non-strategic (including site allocations) sections are being advanced simultaneously. Given the urgency of the delivery issue, we would strongly contend that they should be intrinsically linked and come forward together. We would appreciate some clarity on this matter in due course. In the meantime, please find attached a copy of our previous representations for your background purposes (including those made on the abandoned JSP).</p>	
Hallam Land Management Ltd (David Lock Assoc)			<p>On behalf of Hallam Land Management Ltd ('HLM') we are pleased to respond to the North Somerset Local Plan (2023-2038) Pre-commencement Document and the accompanying Sustainability Appraisal Scoping Report.</p> <p>HLM is the strategic land promotion arm of Henry Boot Group PLC and has participated in shaping the strategy for growth within North Somerset in recent years through the West of England Joint Spatial Plan ('JSP') process, and hopes to continue to do so through the new Local Plan process. HLM controls Land to the East of Clevedon which presents a strategic growth opportunity, adjacent to Junction 25 of the M5.</p>	



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			<p>The proposed scope of the Plan is considered to be sufficiently comprehensive and strategic in nature. HLM is particularly pleased to note that NSC have committed to starting fully afresh in terms of plan-making in the context of the now withdrawn West of England Plan, including identifying and updating the baseline context, rethinking the spatial strategy, and re-assessing extant allocations. This will also include a need to re-assess the previously proposed strategic development locations, their relative contributions to the sustainable development objectives of the emerging plan, and their performance against the SA as a whole.</p> <p>It is imperative that this process starts from a true baseline, disregarding considerations such as previously identified infrastructure funding packages to unlock the once proposed strategic development locations, otherwise this could influence the assessment outcomes.</p> <p>HLM supports the preparation of new evidence base documents that will include, most notably, an Economic Development Needs Assessment, Strategic Housing Land Availability Assessment, Strategic Flood Risk Assessment, Transport Assessment and an Infrastructure Delivery Plan.</p> <p>Notwithstanding the need to start plan preparation afresh, it is critical to ensure a robust and evidenced approach to planning for cross-boundary matters, particularly given the West of England context which presents strong evidence relating to a continuation of Bristol’s unmet housing and employment needs. HLM is concerned therefore to see that only a Local Housing Needs Assessment is proposed to be conducted, and that the new Plan will only “consider policies to help deliver non-strategic growth” identified in the Wider Bristol SHMA (2018) “where there is community support.” HLM would remind NSC of their statutory duty to cooperate on cross-boundary matters (under NPPF Paragraph 24), and that it is their responsibility to proactively identify</p>	

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			<p>such matters now that they alone are the strategic plan-making authority for the District (NPPF Paragraph 25), not only in relation to housing needs but employment needs too.</p> <p>Regarding the Sustainability Appraisal ('SA'), the SA Scoping Report provides a good starting point from which to conduct an SA process. HLM do, however, have the following comments in relation to the five questions set out.</p> <p><b>1. Have all relevant plans and programmes been referenced?</b></p> <p>Yes, this is made clear throughout the SA and in the schedule at Appendix 1. What is not clear, however, is how the new Local Plan will interact with the West of England Joint Local transport Plan 4, the West of England Strategic Economic Plan, including how (or if) it will utilise the West of England evidence base for documents that are not listed for renewal by NSC, such as the Wider Bristol Strategic Housing Market Assessment. We trust that this will be clearly communicated in the Issues and Options document.</p> <p><b>2. Is any significant environmental, social or economic data missing or misrepresented?</b></p> <p>It is noted and supported that Clevedon, Nailsea and Portishead are recognised in the baseline assessment as forming a standalone tier of settlements, second only in sustainability terms to Weston-super-Mare, and that this is carried forward into the scoring matrix for Objective 1.1, thus forming an appropriate starting point for the spatial strategy that aligns with the current settlement hierarchy.</p> <p>From an environmental perspective, it is important that land benefitting from flood defence is recognised in the baseline conditions. Development in such</p>	

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			<p>locations is inherently more sustainable in flood risk management terms than other land within the Flood Zone 3A area, subject of course to the capacity and condition of said flood defences. Indeed, the precedent for development in such areas has already been set at the Weston Villages, which predominantly lie within tidal Zone 3A though benefit from existing flood defence. We trust that this matter will be addressed by and assessed in the new Strategic Flood Risk Assessment and feed into the SA process.</p> <p><b>3. Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan?</b></p> <p>HLM note, as is procedurally correct at this stage, that Green Belt is not within the proposed SA scope, which allows for a fair assessment of all prospective development sites in a policy off scenario. The Green Belt and any revisions to it will however have to be considered and justified as part of the refinement of the site selection process, with Green Belt sites released only if their particular sustainability credentials demonstrate exceptional circumstances.</p> <p><b>4. Do you agree with the proposed Sustainability Appraisal framework?</b></p> <p>HLM would comment that the scoring matrix for Objective 3.4 (minimising impact on treasured landscapes) does not sufficiently prioritise the protection of the Mendip Hills AONB and their setting over and above local landscape character areas. This runs contrary to NPPF Paragraph 72 which affords AONBs the highest status of policy protection. It follows, therefore, that sites within and/or adjacent to the AONB should receive the lowest score for this objective, leaving the other areas of ‘high landscape sensitivity’ elsewhere in the District to receive the second lowest scores.</p> <p>As alluded to in our response to question 2 above, it is believed that</p>	

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			<p>development on land benefitting from flood defences should be scored less negatively than development elsewhere in Zones 3A and 3B. The scoring matrix to Objective 3.3 (minimising vulnerability to tidal and fluvial flooding) should be re-structured to reflect this.</p> <p>With the exception of the above, the SA framework and scoring matrices are considered to be generally robust. The view taken on greenfield development is pragmatic and reasonable, as is the admittance of the need to build in high value areas to better generate funds for supporting infrastructure. We support the approach set out in Appendix 2 that allows embedded mitigation in the form of schools, transport infrastructure and community facilities to be assumed as deliverable on sites above certain capacity thresholds. This allows a fair and realistic comparison between sites of all scales in terms of their accessibility to key services.</p> <p><b>5. Is the proposed methodology for the next stages of the SA correct?</b></p> <p>The proposed methodology as currently presented is considered to generally align with National Planning Practice Guidance.</p>	
CPRE Avonside	CPRE Avonside, North Somerset District		<p>CPRE North Somerset welcomes the opportunity to step back and reassess the strategic context and spatial strategy options for North Somerset. (Background – para 3).</p> <p>We understand there will be a duty to co-operate with neighbouring authorities and are eager to see how the commitments both local and wider to the climate change challenge will be addressed by distinct changes in policy going forward. We also support greater emphasis on creating healthy places and addressing inequalities, particularly those specifically relevant to North Somerset.</p>	

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			<p>North Somerset is fortunate in having a landscape and environment of benefit to residents and visitor's wellbeing and we would like to see this acknowledged and enhanced within the new Plan.</p> <p>We support the proposed Strategic Policies (10.) and would encourage learning from other areas in the UK and Europe to maximise the impact, particularly in design quality with higher density and green infrastructure.</p> <p>We look forward to engaging with North Somerset Council at each stage of the new Local Plan.</p>	
National Trust	National Trust		<p>Thank you for the opportunity to comment on the North Somerset Local Plan pre-commencement document (March 2020).</p> <p>Unfortunately we are not able at the current time to comment in any depth, however I would like to make some high level comments on behalf of the National Trust:</p> <p>The Trust would support the “strong focus” on “tackling the climate change challenge” (para 8), including in respect of sustainable travel and the location of new development. We would also support the protection and enhancement of landscapes, wildlife and historic assets.</p> <p>In addition, the Trust has advocated ‘creating more space for nature to thrive’, and has previously (in response to the JSP) encouraged the early preparation of an ambitious green infrastructure plan. Those comments continue to apply, and are particularly relevant for policies and initiatives that seek to enhance green infrastructure, biodiversity and habitat connectivity (Lawton principles etc).</p>	

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			<p>Purely for information, the National Trust’s environmental pledges (in order to tackle climate change) are as follows:</p> <ul style="list-style-type: none"> <li>• By 2025 we'll have created 25,000 hectares of new wildlife habitats</li> <li>• In ten years we will establish 18,000 hectares of new woodland made up of more than 20 million trees</li> <li>• We will become carbon net zero by 2030</li> <li>• By 2021 50 per cent of our energy needs will be met by renewable sources</li> <li>• We will create green corridors for people and nature near towns and cities</li> <li>• We're embarking on a year-long campaign to connect people with nature to celebrate our 125th anniversary year.</li> </ul>	
Lands Improvement		Pegasus (D Millward)	<p><b>INTRODUCTION</b></p> <p>Pegasus Group is instructed to submit representations to the North Somerset Local Plan Pre-commencement Consultation on behalf of Lands Improvement (LI). LI control land at Court House Farm, Plummers Hill, Easton-in-Gordano and are promoting the site for residential development. The location and extent of LI's land interest is shown below. (See attachment)</p> <p>LI consider the site to be sustainably located on the edge of a Service Centre settlement and able to deliver housing to meet the housing needs of the local community. The site is comprised of poor-quality Green Belt land in functional terms and is an excellent candidate for allocation in the new Local Plan. LI look forward to working with Council officers as the new Local Plan progresses to bring the site forward for development.</p>	<a href="#">P16-1434 Pre-com Reqs DM 20.04.2020.pdf</a>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>These representations provide our views on the scope of the new Local Plan and also provides comments on the Sustainability Appraisal Scoping Report (SASR).</p> <p><b>EXECUTIVE SUMMARY</b></p> <p><b>We have also provided an executive summary of the salient points raised within these representations. These are as follows:</b></p> <ul style="list-style-type: none"> <li>▪ The withdrawal of the JSP and the failure to review the housing target within the Local Plan means there is an urgency to get a robust, justified and soundly prepared plan for North Somerset;</li> <li>▪ The Council needs to acknowledge that the proposed Spatial Strategy was one of a number of flaws with the JSP and it will be important to ensure that the same mistakes are not repeated during the preparation of the new Local Plan;</li> <li>▪ We support the commitment to co-operation with neighbouring authorities and expect that, at the very least, North Somerset will need to take some of Bristol's unmet housing need;</li> <li>▪ We suggest that the proposed plan period and requirement to comply with Paragraph 22 of the NPPF may be problematic if there is any slippage in the proposed timetable. We would suggest adjusting this plan period to mitigate this risk;</li> </ul>	

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			<ul style="list-style-type: none"> <li>▪ Whilst a review of the current approach should naturally be explored, it will be important to make sure the approach to developing the spatial strategy is done through a comprehensive and iterative assessment of <i>all</i> potential locational options.</li> <li>▪ We consider it likely that exceptional circumstances will exist to justify releasing land from the Green Belt and these should be established at the earliest opportunity to ensure a Green Belt review can be undertaken accordingly;</li> <li>▪ We support the preparation of a singular plan which sets both the spatial strategy and includes detailed site allocations;</li> <li>▪ However, we would not support a two-part plan with site allocations being deferred to a later plan given the pressing need for housing to be delivered in the short-term;</li> <li>▪ We are largely supportive of the SA Scoping Report; however, would wish to see a greater emphasis placed on delivery/deliverability given the failings of the adopted Local Plan; and</li> <li>▪ The protection of the Green Belt is correctly omitted from the SA Framework given that this designation does not impact on the sustainability of development.</li> </ul> <p data-bbox="887 1294 1541 1321">LOCAL PLAN PRE-COMMENCEMENT DOCUMENT</p>	



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			<p>Below we set out our comments on the Local Plan Pre-commencement Document (PCD). These are largely structured around specific paragraphs of sections.</p> <p><b>Introduction – Paragraph 1</b></p> <p>The introductory paragraph notes that the existing timeframe for planning documents in North Somerset runs to 2026. It also mentions that the adopted Core Strategy included a commitment to an early review of the housing requirement by the end of 2018.</p> <p>It is important to also note that the adopted Site Allocations Plan (April 2018) was found sound on the basis that the emerging Local Plan at the time was due to be adopted shortly (in line with the timetable associated with the JSP) and thus the housing requirement would be review. Indeed, it had been expected that this plan should have been in place by now.</p> <p>However, the JSP and emerging Local Plan have since fallen away, hence the current consultation on the PCD. It is important to understand that the adopted Development Plan is ostensibly unfit for purpose and there is a significant degree of urgency to get a robust, justified and soundly prepared Development Plan in place to meet the current and future development needs of North Somerset. This point cannot be emphasised enough.</p> <p><b>Background – Paragraphs 2-4</b></p> <p>The background paragraphs summarise the history of the ill-fated JSP and previously emerging Local Plan. It will be important for the Council (along with the other JSP authorities) to learn the lessons from the preparation of the JSP and make sure these are not repeated as they progress their individual local plans.</p>	

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			<p>We are keen to highlight that the Inspectors' criticism of the JSP was not solely in relation to the Spatial Strategy. Their criticism also extended to:</p> <ul style="list-style-type: none"> <li>▪ The Sustainability Appraisal Methodology;</li> <li>▪ The selection of Strategic Sites;</li> <li>▪ The disaggregation of the Housing Requirement between the authorities;</li> <li>▪ The failure to robustly justify the release of Green Belt sites;</li> <li>▪ Policies which were overly prescriptive given their strategic nature;</li> <li>▪ A failure to justify the "non-strategic" growth figure or robustly assess alternative figures;</li> <li>▪ Justify the employment land requirements;</li> <li>▪ Failure to give due consideration to Bristol Port and Bristol Airport which are of strategic importance to the region.</li> </ul> <p>It is imperative that the Council review these failures to ensure that the new Local Plan is robustly justified and soundly prepared, especially given the</p>	

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			<p>importance of getting a plan in place, highlighted in our comments on Paragraph 1 of the PCD.</p> <p><b>Duty to co-operate – Paragraph 6</b></p> <p>We agree that the withdrawal from the JSP should not reduce the level of co-operation between relevant authorities on important issues and welcome the reassurances that the preparation and maintenance of an evolving Statement of Common Ground will be important as the plan progresses.</p> <p>Whilst this will need to cover a range of matters, it will be important for the Council to acknowledge the relationship between residents in North Somerset, South Gloucestershire and Bristol in terms of accessing services, facilities and employment opportunities. Given that significant development at Bristol is limited by various constraints (not least Green Belt and administrative boundary issues), it is likely that both North Somerset and South Gloucestershire will need to deliver additional housing to meet Bristol's unmet need. This should be an important factor in early discussions between the relevant authorities to ensure that the housing needs for the wider region are successfully delivered.</p> <p><b>Scope of the North Somerset Plan – Paragraphs 7-12</b></p> <p><b>Paragraph 7</b> states that the plan period will cover 2023-2038 to be consistent with Paragraph 22 of the NPPF's requirement for strategic policies to look ahead over a 15-year period. We would suggest that this leaves very little leeway and, whilst the Council acknowledge this may need to be reviewed, it may be prudent to plan for a longer period of time to ensure that the plan will be up to date upon its adoption.</p> <p>It may also be prudent to account for the years prior to 2023 in the plan given that the adopted Local Plan cannot be relied upon to deliver the development</p>	

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			<p>needs of the district. Indeed, we consider that the start date for the Local Plan should tally with the year that the Core Strategy housing requirement should have been reviewed by (2018). This would allow the Council to mitigate the impacts of not having an up to date Local Plan in place between 2018 and 2023 (e.g. failure to deliver sufficient housing).</p> <p>By covering the period of say 2018-2041 the plan could seek to better mitigate against the failings of the adopted plan whilst building in sufficient flexibility to ensure compliance with paragraph 22 of the NPPF.</p> <p>We support the sentiment of <b>Paragraph 8</b> that a key focus of the Plan should be to tackle the climate change crisis, alongside creating healthy places and addressing inequalities.</p> <p>We also welcome <b>Paragraph 8 and 9's</b> suggestion that the existing strategy, policies and allocations will be reviewed as part of the emerging plan in light of the clear deficiencies with the current strategy that has resulted in a significant under-delivery of housing in recent years.</p> <p>Whilst a review of the current approach should naturally be explored, a holistic approach needs to be undertaken when formulating the new spatial strategy. It will be important to make sure the approach to developing the spatial strategy is done through a comprehensive and iterative assessment of <i>all</i> potential locational options.</p> <p><b>Paragraph 10</b> sets out the proposed strategic policies that will be contained in the Local Plan. We are broadly supportive of the list provided. Specifically, we support the consideration of Green Belt releases to meet the Council's housing requirement.</p>	

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			<p>Given that the Green Belt designation affects around 40% of the entire district and these areas, by virtue of their proximity to Bristol, tend to be among the more sustainable locations, we would suggest that it is likely that exceptional circumstances will be demonstrated to release land from the Green Belt when the relative sustainability credentials of spatial options are assessed as part of the SA.</p> <p>In order to support any releases, a full Green Belt review will need to be undertaken to understand potential areas that could be released and to understand which sites would be the most preferable in Green Belt terms (e.g. by assessing the contribution they make to the five purposes set out at paragraph 134 of the NPPF).</p> <p>Consideration to whether exceptional circumstances exist needs to be given consideration early in the preparation of the plan process and this will need to be either followed by/done in tandem with a review of the Green Belt.</p> <p>We also note that the Plan is proposed to include both strategic policies identifying broad locations for growth within an overarching strategy alongside formal allocations and development management policies. Whilst we do not object to this structure in principle, it will be important for both of these areas to be covered in a singular plan that will be in place by 2023 (or as close to this date as soon as possible) in order to ensure that housing delivery will not be impeded any longer than it needs to be. We note that the PCD and Local Development Scheme (LDS) indicate the Council's intention for this plan to include site allocations and we are supportive of this approach. However, we would not support the adoption of a strategic level plan in the short-term, to be followed by an allocations plan given that it is imperative that housing is delivered in the shorter-term.</p> <p><b>Relationship to Neighbourhood Planning – Paragraphs 13-16</b></p>	

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			<p>The Council notes that as the new Local Plan progresses, the strategic policy context in which in which Neighbourhood Plans exist will also change, potentially rendering them out of date.</p> <p>Whilst the Council's proposal to set out the housing requirement on a parish basis in the strategic policies may provide clarity, we would stress that this needs to be justified in the context of the overall spatial strategy.</p> <p>We welcome the Council's suggestion that they will engage with relevant stakeholders to ensure that any neighbourhood plans will be progressed in tandem with the emerging Local Plan and achieve consistency between the two.</p> <p><b>Sustainability Appraisal – Paragraph 17</b></p> <p>We have responded in detail to the Sustainability Appraisal (SA) Scoping Report in Section 3 below.</p> <p><b>Timescales – Paragraph 18</b></p> <p>We welcome the Council's proposed timetable and consider it to be ambitious in terms of the proposed adoption date. Whilst we are keen to ensure the Plan is adopted as quickly as possible, it will also be important to ensure the Plan is robust, justified and soundly prepared. Given the work that will be required, we are concerned that this timetable may well slip.</p> <p>Furthermore, we are mindful that the proposed timetable and plan period leave no real headroom to be confident that Paragraph 22 of the NPPF will be complied with. Any delay to the Local Plan's preparation could result in the proposed Plan falling foul of 15-year requirement for strategic policies. We would, therefore, urge the Council to reconsider the proposed plan period to account for this risk.</p>	

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			<p>As suggested above, a plan period that covers a longer period (we suggest 2018-2041) would allow the new plan to mitigate against the failings of the adopted plan, whilst still complying with NPPF upon adoption, even in the event of programme slippage.</p> <p><b>SUSTAINABILITY APPRAISAL SCOPING REPORT</b></p> <p>The Council have also published a Sustainability Assessment Scoping Report alongside the PCD. The purpose of the document is to set out a framework to guide the assessment of spatial strategy options, sites and policies of the new Local Plan. This will assist with the understanding of the impacts of the potential options in environmental, social and economic terms. A preferred spatial option will then be identified within the draft Local Plan, prior to its submission to the Inspectorate.</p> <p>Paragraph xii provides a list of questions that the Council are specifically seeking responses to as part of the current consultation. We have no comment to make in respect of Questions 1, 2 and 5 but have provided the following response to Questions 3 and 4 below.</p> <p><u>Question 3 – Are there any additional sustainability issues within North Somerset that need to be considered in the development of the new Local Plan?</u></p> <p><i>Deliverability</i></p> <p>Whilst the sustainability issues listed provide a relatively comprehensive overview of the key issues affecting North Somerset, we consider that the issue of delivery/deliverability has been underplayed in the identification of important issues.</p>	

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			<p>As we have alluded to previously in the representations, the adopted Local Plan has failed to deliver the necessary homes, employment floorspace and supporting infrastructure for a number of years.</p> <p>This has been manifested in the Council's housing supply and delivery record of the plan period to date. On the matter of supply, the Council's stated position that it can demonstrate a 4.4 years supply of housing land is extraordinarily tenuous when other estimates indicate that it could be as low as 1.69 years when properly assessed against national guidance.<sup>1</sup> Indeed, it is important to note that the Council's position, regardless of the actual level of supply, has had to be underpinned in recent years by speculative development across the district, thus reinforcing the ineffectiveness of the adopted plan and its proposed site allocations.</p> <p>Furthermore, the housing delivery test results also make poor reading for the Council, showing that they have only delivered 78% of their housing requirement over the past 3 years. Again, this highlights the fact that the Council's current strategy has been woefully deficient in meeting its delivery needs over the current plan period.</p> <p>The knock-on impact of the failure to maintain an adequate supply of housing land and deliver the minimum housing requirement over a number of years has hindered the ability of the adopted plan to deliver its aspirations (e.g. reductions in out-commuting) and had adverse impacts on important social issues (e.g. housing affordability). The deliverability of a plan, allocation or policy is an important consideration given that there can be significant environmental, social and/or economic consequences if it cannot be implemented. This should, therefore, be a significant factor in their assessment as part of the sustainability appraisal and we do not consider that this has been explored sufficiently within the Scoping Report.</p>	



Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p><i>Green Belt</i></p> <p>We welcome the absence of any reference to the need to protect the Green Belt for the purposes of assessing the sustainability of spatial options. Whilst we agree that the Green Belt is an important national designation and that it should be protected in line with the provisions of the NPPF and PPG, it is not an environmental, ecological or landscape designation that is, necessarily, any less <i>sustainable</i> to build on than land outside of the Green Belt.</p> <p>In simple terms, Green Belt land is no more/less sustainable to develop than non-Green Belt land and this should be reflected in the SA, as it currently appears it will be.</p> <p>Furthermore, it is important to consider the sustainability credentials of strategies that both do and do not involve the release of Green Belt land in order to demonstrate that exceptional circumstances exist to amend Green Belt boundaries. There are significant amounts of Green Belt land in highly sustainable locations. These locations include, to the south-west of Bristol, Portishead and other key service centres on important transit routes to/from these larger settlements – e.g. Easton-in-Gordano and Long Ashton. The sustainability appraisal will likely show that there are significant sustainability benefits to delivering development in these locations, relative to spatial options that do not. This, in turn, can support an argument to release land from the Green Belt to meet development needs in line with national policy/guidance.</p> <p><u>Question 4 - Do you agree with the proposed Sustainability Appraisal Framework?</u></p> <p>We are generally supportive of the Sustainability Appraisal Framework and, following on from our comments above, welcome the absence of any impacts on the Green Belt from the assessment of a site's sustainability credentials.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>However, following on from our comments regarding deliverability, we consider that this should be more prominent within any assessment.</p> <p>We note that delivery is touched upon at SA Objectives 1.5 and 2.1 and we welcome this acknowledgement. However, for the reasons set out above, we consider that deliverability should be a stand-alone SA Objective within the framework.</p> <p><b>LAND AT COURT HOUSE FARM, PLUMMERS HILL, EASTON- IN-GORDANO</b></p> <p>As stated in the introduction, our client controls land at Court House Farm, Plummers Hill, Easton-In-Gordano. The site has been promoted previously through the JSP and Local Plan. We have appended the Site Location Plan to these representations and provided an extract below (see attachment).</p> <p>The site (as identified above) is located on the western edge of Easton-in-Gordano. The M5 runs along the northern edge of the site and the site is located in close proximity to Junction 19 with the remainder of the northern boundary abutting Gordano services.</p> <p>The site is located beyond, albeit adjacent to, the defined settlement boundary and is located within the Green Belt. Although located within the Green Belt the JSP Green Belt Stage 2 Assessment concluded that the cell 77a (which includes the Court House Farm site) made:</p> <ul style="list-style-type: none"> <li>▪ <b>Limited Contribution</b> – Checking the unrestricted sprawl;</li> <li>▪ <b>Limited Contribution</b> – Preventing neighbouring towns merging into one another;</li> </ul>	

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			<ul style="list-style-type: none"> <li>▪ <b>Limited Contribution</b> – Assisting in safeguarding the countryside from encroachment;</li> <li>▪ <b>No Contribution</b> – Preserving the setting and character of historic towns; and</li> <li>▪ <b>Limited Contribution</b> – Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ul> <p>The construction of the M5 motorway and the built-up area of Pill has created a more defensible boundary close to the urban area resulting in a small pocket of land which no longer performs an important Green Belt function.</p> <p>The site is located within Flood Zone 1 (area of lowest risk) and has no overriding constraints to development.</p> <p>Although a small number of Grade II Listed Buildings are located close to the site’s boundary, they are not considered to restrict the development of this site.</p> <p>The site benefits from two access points with the principal access being onto St. George’s Hill. The site is near the Avon Cycleway which runs along the front of the site and near a bus stop which serves Bristol (via the X3A and X4 services) twice hourly.</p> <p>The existing evidence suggests that this site is highly suited to residential development and it is located on the edge of a sustainable settlement. The sustainability credentials of Easton-in-Gordano will be further enhanced when the train station at Portishead is delivered. It is understood that the funding for this infrastructure project has now been secured and is scheduled for completion in 2023.</p>	

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			<p>Whilst we appreciate that the plan is at its very early stages, we have long maintained that the sustainability benefits of releasing Green Belt land, coupled with the other constraints within the district (Flood Risk and AONB) provides the exceptional circumstances required to release land for development. We fully expect this conclusion to be borne out as part of the Sustainability Appraisal.</p> <p>Easton-in-Gordano is identified as a Service Village within the current settlement hierarchy. This means it is home to services, facilities and employment opportunities that meet the needs of both its residents and a wider catchment area.</p> <p>The settlement lies on an important commuting thoroughfare between Portishead and Bristol and will soon have access to a train station once the Portishead line is re-opened in 2023.</p> <p>Additional development at Easton-in-Gordano is required to meet the needs of local residents, given that this has been constrained in recent years under various local plans. The delivery of both affordable and market housing is essential to help sustain its role as an important service centre within the settlement hierarchy.</p> <p>The site is, therefore, considered to be a highly sustainable location for development.</p> <p>As noted above, the site only makes a limited contribution to the functions of the Green Belt and, consequently, is highly suited for release and allocation in the new Local Plan.</p> <p>The Site can accommodate approximately 200 dwellings and provide a policy compliant level of affordable housing.</p>	

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			<p>We would welcome the opportunity to discuss the site further with North Somerset Council during the new Local Plan progressions. To this end, we have attached a vision document that has been prepared by Lands Improvement to provide an indication of how the site could come forward for development.</p>	
Natural England	Natural England		<p><b>Planning consultation: North Somerset Council - Local Plan Sustainability Appraisal Scoping Report</b></p> <p>Thank you for your consultation on the above dated 09 March 2020 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>Having reviewed the Pre-commencement and SA Scoping documents we welcome the acknowledgement of the opportunity to step back and reassess the strategic context and spatial strategy options. That reassessment should be supported by the best available evidence and will benefit from the evidence gathered through the JSP process and other ongoing local initiatives. In particular we would highlight the following:</p> <ul style="list-style-type: none"> <li>• Evidence from the SA and HRA for the JSP, particularly that which identified need for a strategic solutions to protect key nature</li> </ul>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>conservation interests in North Somerset, including rare bats and habitats sensitive to recreational pressures.</p> <ul style="list-style-type: none"> <li>• Evidence presented in the Joint Green Infrastructure Strategy that illustrates how key priorities for nature, health, climate and can be delivered through an integrated approach to protection and provision of GI, prioritising key strategic projects.</li> <li>• Evidence from environmental assessment of recent major development applications in North Somerset, including Bristol Airport, and large housing developments such as those around Nailsea, Weston, Clevedon and Banwell.</li> </ul> <p>In addition the reassessment also allows more meaningful consideration of other local and national priorities, including climate and ecological emergencies, and work to take forward the Government’s 25YEP, including a nature recovery network and biodiversity net gain. New legislation and duties will come into being during the preparation of the Local Plan.</p> <p>A spatial strategy should take account of all major constraints, issues and opportunities. The evidence described above will be key to this, and we welcome the intention to look at again at the Green Belt, which we believe can have an enhanced role in delivering goals of the Plan and sustainable development.</p> <p>In developing Issues and Options we would encourage your Authority to ‘think big’ about solutions to the significant challenges faced. Consideration of the natural environment often takes place once development strategy has been formulated but the imperative to plan strategically for nature, green infrastructure and climate mitigation and adaptation responses, alongside development, has never been stronger. This also provides opportunities to identify joined-up solutions at a landscape scale that address can address</p>	

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			<p>multiple issues. For example, significant and well-located new areas of habitat creation or enhancement, possibly in the form of a country park, if in the right place and can provide a range of functions and services including ecological mitigation and supporting a nature recovery network, health/recreation and green travel opportunities, nature-based climate change responses, and sustainable water management. While the SA should consider these interests in the own right we would encourage objectives that also facilitate identification of joined-up solutions.</p> <p>We would also point out that the JSP recognised that GI was critical infrastructure needed to support development, in the same way that transport and flood infrastructure is, and we would encourage your Authority to maintain that recognition in the new Plan.</p> <p>We have considered the Sustainability Appraisal Scoping Report and offer the following comments in relation to the consultation questions:</p> <p>The SEA Directive sets out the topics that a SA/SEA must cover in its assessment. Natural England is an identified consultation body for biodiversity including flora, fauna, human health, soil (including waste and contaminated land issues), water (water quality and resources), air, climatic factors (including strategic flood risks), material assets (including geological interests and infrastructure), cultural heritage and Landscape. We are the lead authority for biodiversity and landscape and identified as a source of information for soils, material assets and cultural heritage.</p> <p><i>1. Have all relevant plans and programmes been referenced?</i></p> <p>We would expect the draft JSP SA and HRA to also be relevant - a considerable amount of evidence was gathered to inform these assessments, including in</p>	

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			<p>relation to designated sites, much of which remains relevant to North Somerset specifically and to cross boundary considerations - for example, in relation to protection of rare horseshoe bats, improving water and air quality, and managing the effects of recreation on sensitive habitats, species and landscapes.</p> <p>There are a number of supplementary planning documents referred to that are several years old, such as North Somerset Biodiversity and Trees SPD (2005) which may benefit from updating. The North Somerset and Mendip Bats Special Area of Conservation (SAC) guidance on development SPD (2018), although relatively recently adopted, has in fact been revised by Somerset County to reflect new evidence. We would encourage the council to consider the potential value of updating these SPDs to guide new development while the new local plan is being prepared.</p> <p><i>2. Is any significant environmental, social or economic data missing or misrepresented?</i></p> <p>The baseline for tourism identifies a number of key attractions; many of these locations are within or close to protected sites and landscapes, which as noted above, are under increasing pressure from the effects of recreation. This illustrates the need for an integrated cross sectoral approach.</p> <p>We note the reference to the condition of SSSIs within North Somerset, which suggests 77.2% are in favourable condition. We are concerned that this figure is based on out of date information for many SSSIs and masks the reality of the current condition of these sites. Local Natural England SSSI lead advisers confirm that many of SSSIs are under increasing pressure from development related issues, which include poor water quality due to run-off, inappropriate or lack of management (absence of grazing animals and scrub encroachment), often due to high recreational pressure, as well as a range of urban fringe effects</p>	



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			<p>such as increased lighting, noise, fly tipping, cat predation, dog fouling, vandalism etc. Many of these SSSIs are noted as being key tourist attractions and their ongoing protection and management (particularly those sites where grazing is a key part of favourable site condition) is important for the tourism sector as well as for their intrinsic ecological, landscape and/or geological interest.</p> <p>We are pleased the importance of water quality is recognised, as this is a widespread issue in North Somerset; however we are concerned the baseline references to the Severn Estuary River Basin Management Plan and to the North Somerset Levels and Moors Catchment Project might imply the identified issues are in hand, while we understand the funding and implementation of mitigation measures is still largely to be determined.</p> <p>We are also pleased the significant environmental, social and economic benefits of green infrastructure is recognised and that the West of England Joint Green Infrastructure Strategy is referenced. The emerging JGIS provides a framework for bringing together a range of evidence and priorities, including the nature recovery network, so that the spatial strategy for development can be more integrated and local projects can be developed where they will have most benefit. Implementation of the WoE GI strategy will need to be supported by suitable policies in the new local plan.</p> <p>We would welcome the opportunity to continue to work with North Somerset council and other authorities to coordinate the approach to strategic issues and identify best practice across the subregion. It will also be necessary to consider the need to work strategically with neighbouring Somerset authorities to identify shared issues, for example in relation to the Severn Estuary and Mendip Limestone Grasslands EU sites, and the Mendip Hills AONB. The Environment Bill and 25 year plan are clear that protection and enhancement of nature needs</p>	

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			<p>to go beyond existing designated sites to secure more, bigger and better connected habitats that will be needed to halt the loss of biodiversity and deliver a range of other ecosystem benefits to society.</p> <p><i>3. Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan document?</i></p> <p>We welcome the Council's recognition of the current climate emergency and the objective to reduce GHG to mitigate climate change. However objectives relating to climate change adaptation are also needed in recognition that some changes are inevitable and suitable measures will be needed to reduce the adverse effects of this on people and the natural environment. We would expect the new local plan to have an important role in setting out how its spatial strategy will support climate change adaptation and mitigation, ideally identifying where natural solutions to managing threats and risks may be more cost-effective than hard engineering projects.</p> <p>We note the references to the Duty to Cooperate and commitment to working with neighbouring authorities and others to address strategic issues. The progression of the West of England GI strategy provides a way of meeting this duty in relation to the natural environment. A joined up approach to the natural environment will be equally important with Somerset authorities. Sedgemoor District in particular shares cross boundary European and nationally protected sites and landscapes with North Somerset district - recognising recreational pressures are already impacting on these areas and are likely to increase as a result of the new local plan.</p> <p><i>4. Do you agree with the proposed Sustainability Appraisal Framework?</i></p>	

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			<p>We have a number of concerns with the Sustainability Appraisal Framework as presented. It is essential that SA objectives and assessment criteria are robust and address the right issues and requirements. The proposed SA objectives and decision making criteria as set out in tables 12 to 14 are not always easy to understand, with a number of apparent omissions and a lack of coherence in some parts – we have highlighted some examples below, but would welcome further discussion with the Council.</p> <p>Table 12</p> <p>We recognise the urgent need to reduce carbon and other GHG emissions and are supportive of objective 3.1 <i>Support decentralised renewable energy generation</i>; renewable energy schemes can have negative impacts, including on landscape and ecological interests, and we would encourage the Council to consider undertaking a sensitivity/capacity study to ensure the most appropriate renewable technologies are directed to the most suitable locations. As previously mentioned, we would encourage the Council to include an objective for climate change adaptation and an objective to protect natural resources, including soil, air and water. We also suggest ‘where possible’ is deleted from objective 3.6 in recognition that the Environment Bill is most likely to be have become law by 2023, the beginning of the plan period, and it is expected that all new development will be required to provide a ‘net gain’ for biodiversity - if such gains are not possible to achieve on site, an off-site contribution will be required. We would encourage the council to consider developing more detailed guidance on ‘BNG’ in the form of a SPD.</p> <p>Table 13</p>	

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			<p>We note that <i>'development at coastal locations'</i> is considered to be a positive effect of the plan in relation to objective 2.5 improve health and wellbeing; this may be the case but the rationale for this statement is not clear and we would welcome further explanation, particularly as the North Somerset coastline lies adjacent to the Severn Estuary European site. The landscape/townscape objective 3.4 is broadly welcome, although the criteria should recognise that impacts on Mendip Hills AONB can arise from development outside, but in the setting of the AONB, depending on its characteristics and special qualities. Objective 3.6 protect and where possible enhance biodiversity and Green Infrastructure is welcome in principle, subject to deletion of 'where possible'; however to be meaningful the suggested scoring criteria and indicators will require a robust baseline and understanding of ecological assets. A great deal of evidence has been gathered to inform the WoE GI strategy and other plans and projects, the Council has also commissioned bat surveys in relation to the Bats SAC. This information should provide a reasonably sound basis for the new local plan.</p> <p>It will also be necessary to develop a mechanism for calculating and securing biodiversity net gain from development, ideally linked to locally agreed GI priorities, such as protecting and reinforcing local nature recovery networks and providing new recreational opportunities to alleviate recreational and other pressures on sensitive habitats. It will be essential that a robust and consistent approach to the requirements and standards expected for site based habitat surveys and analysis is set out clearly in the new local plan.</p> <p>Table 14</p> <p>Compatibility of SA objectives appears to have identified only one negative effect, relating to meeting housing needs and water quality – we recognise there is an existing issue with poor water quality in the district arising from</p>	

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			<p>development, including at Nailsea and underneath J19 of the M5, however this seems unlikely to be the only example of conflicting objectives, when considering the range of adverse effects new development can have on the natural environment.</p> <p><i>5. Is the proposed methodology for the next stages of the Sustainability Appraisal correct?</i></p> <p>Subject to some changes to the SA Framework objectives and targets, the methodology itself appears reasonable and to follow standard practice.</p> <p>Monitoring We note the monitoring questions:</p> <ul style="list-style-type: none"> <li>• Were the assessment’s predictions of sustainability effects accurate?</li> <li>• Is the plan contributing to the achievement of desired SA objectives and targets?</li> <li>• Are mitigation measures performing as well as expected?</li> <li>• Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?</li> </ul> <p>Monitoring is an essential element of the local plan process – the above questions are reasonable, but again are dependent on having set appropriate objectives and targets and identifying suitable and measurable indicators of success or otherwise. We expect the broad objectives and targets will need to become more specific as plan options are refined - for example to measure the progress of green infrastructure and/or strategic mitigation schemes such as may be required to address impacts on designated sites and landscapes.</p>	
Barratt Homes		Pegasus (D Millward)	<b>INTRODUCTION</b>	<a href="#">P17-1777 Pre-com Repts DM 20.04.2020.pdf</a>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>Pegasus Group is instructed to submit representations to the North Somerset Local Plan Pre-commencement Consultation on behalf of Barratt Homes (Bristol) Ltd. Barratt Homes (Bristol) have a specific land interest at the site known as 'Land Off Colliters Way, Highridge Bristol'. The site sits on the southwest edge of Bristol which is now contained by the South Bristol Link Road. A site location plan is attached at Appendix 1 (see attachment).</p> <p>The site forms part of a wider parcel of land that was identified as having potential to come forward for development in previous emerging plans for North Somerset and Bristol City Councils. Whilst the site is located within the Green Belt, it now only makes a limited contribution to achieving its purposes and, given its highly sustainable location on the southern edge of Bristol, is considered to represent an excellent prospect for allocation in the emerging Local plan.</p> <p>These representations provide our views on the scope of the new Local Plan and also provides comments on the Sustainability Appraisal Scoping Report.</p> <p><u>Executive Summary</u></p> <p>We have also provided an executive summary of the salient points raised within these representations. These are as follows:</p> <ul style="list-style-type: none"> <li>▪ The withdrawal of the JSP and the failure to review the housing target within the Local Plan means there is an urgency to get a robust, justified and soundly prepared plan for North Somerset;</li> <li>▪ The Council needs to acknowledge that the proposed Spatial Strategy was one of a number of flaws with the JSP and it will be important to ensure that the</li> </ul>	

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			<p>same mistakes are not repeated during the preparation of the new Local Plan;</p> <ul style="list-style-type: none"> <li>▪ We support the commitment to co-operation with neighbouring authorities and expect that, at the very least, North Somerset will need to take some of Bristol's unmet housing need;</li> <li>▪ We suggest that the proposed plan period and requirement to comply with Paragraph 22 of the NPPF may be problematic if there is any slippage in the proposed timetable. We would suggest adjusting this plan period to mitigate this risk;</li> <li>▪ Whilst a review of the current approach should naturally be explored, it will be important to make sure the approach to developing the spatial strategy is done through a comprehensive and iterative assessment of <i>all</i> potential locational options.</li> <li>▪ We consider it likely that exceptional circumstances will exist to justify releasing land from the Green Belt and these should be established at the earliest opportunity to ensure a Green Belt review can be undertaken accordingly;</li> <li>▪ We support the preparation of a singular plan which sets both the spatial strategy and includes detailed site allocations;</li> <li>▪ However, we would not support a two-part plan with site allocations deferred to a later plan given the</li> </ul>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>pressing need for housing to be delivered in the short-term;</p> <ul style="list-style-type: none"> <li>▪ We are largely supportive of the SA Scoping Report; however, would wish to see a greater emphasis placed on delivery/deliverability given the failings of the adopted Local Plan; and</li> <li>▪ The protection of the Green Belt is correctly omitted from the SA Framework given that this designation does not impact on the sustainability of development.</li> </ul> <p>We have also briefly summarised the merits of our client's site and how this could help to achieve the objectives of the emerging Local Plan.</p> <p><b>LOCAL PLAN PRE-COMMENCEMENT DOCUMENT</b></p> <p>Below we set out our comments on the Local Plan Pre-commencement Document (PCD). These are largely structured around specific paragraphs of sections.</p> <p><b>Introduction – Paragraph 1</b></p> <p>The introductory paragraph notes that the existing timeframe for planning documents in North Somerset runs to 2026. It also mentions that the adopted Core Strategy included a commitment to an early review of the housing requirement by the end of 2018.</p> <p>It is important to also note that the adopted Site Allocations Plan (April 2018) was found sound on the basis that the emerging Local Plan at the time was due to be adopted shortly (in line with the timetable associated with the JSP) and</p>	



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			<p>thus the housing requirement would be review. Indeed, it had been expected that this plan should have been in place by now.</p> <p>However, the JSP and emerging Local Plan have since fallen away, hence the current consultation on the PCD. It is important to understand that the adopted Development Plan is ostensibly unfit for purpose and there is a significant degree of urgency to get a robust, justified and soundly prepared Development Plan in place to meet the current and future development needs of North Somerset. This point cannot be emphasised enough.</p> <p><b>Background – Paragraphs 2-4</b></p> <p>The background paragraphs summarise the history of the ill-fated JSP and previously emerging Local Plan. It will be important for the Council (along with the other JSP authorities) to learn the lessons from the preparation of the JSP and make sure these are not repeated as they progress their individual local plans.</p> <p>It is important to note that the Inspectors' criticism of the JSP was not solely in relation to the Spatial Strategy. Their criticism also extended to:</p> <ul style="list-style-type: none"> <li>▪ The Sustainability Appraisal Methodology;</li> <li>▪ The selection of Strategic Sites;</li> <li>▪ The disaggregation of the Housing Requirement between the authorities;</li> <li>▪ The failure to robustly justify the release of Green Belt sites;</li> </ul>	

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			<ul style="list-style-type: none"> <li>▪ Policies which were overly prescriptive given their strategic nature;</li> <li>▪ A failure to justify the "non-strategic" growth figure or robustly assess alternative figures;</li> <li>▪ Justify the employment land requirements;</li> <li>▪ Failure to give due consideration to Bristol Port and Bristol Airport which are of strategic importance to the region</li> </ul> <p>It will be important to review these failures to ensure that the new Local Plan is robustly justified and soundly prepared, especially given the importance of getting a plan in place, highlighted in our comments on Paragraph 1 of the PCD.</p> <p><b>Duty to co-operate – Paragraph 6</b></p> <p>We agree that the withdrawal from the JSP should not reduce the level of co-operation between relevant authorities on important issues and welcome the reassurances that the preparation and maintenance of an evolving Statement of Common Ground will be important as the plan progresses.</p> <p>Whilst this will need to cover a range of matters, it will be important for the Council to acknowledge the relationship between residents in North Somerset, South Gloucestershire and Bristol in terms of accessing services, facilities and employment opportunities. Given that significant development at Bristol is limited by various constraints (not least Green Belt and administrative boundary issues), it is likely that both North Somerset and South Gloucestershire will need to deliver additional housing to meet Bristol's unmet need. This should be</p>	

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			<p>an important factor in early discussions between the relevant authorities to ensure that the housing needs for the wider region are successfully delivered.</p> <p><b>Scope of the North Somerset Plan – Paragraphs 7-12</b></p> <p><b>Paragraph 7</b> states that the plan period will cover 2023-2038 to be consistent with Paragraph 22 of the NPPF's requirement for strategic policies to look ahead over a 15-year period. We would suggest that this leaves very little leeway and, whilst the Council acknowledge this may need to be reviewed, it may be prudent to plan for a longer period of time to ensure that the plan will be up to date upon its adoption.</p> <p>It may also be prudent to account for the years prior to 2023 in the plan given that the adopted Local Plan cannot be relied upon to deliver the development needs of the district. Indeed, we consider that the start date for the Local Plan should tally with the year that the Core Strategy housing requirement should have been reviewed by (2018). This would allow the Council to mitigate the impacts of not having an up to date Local Plan in place between 2018 and 2023 (e.g. failure to deliver sufficient housing).</p> <p>By covering the period of say 2018-2041 the plan could seek to better mitigate against the failings of the adopted plan whilst building in sufficient flexibility to ensure compliance with paragraph 22 of the NPPF.</p> <p>We support the sentiment of <b>Paragraph 8</b> that a key focus of the Plan should be to tackle the climate change crisis, alongside creating healthy places and addressing inequalities.</p> <p>We also welcome <b>Paragraph 8 and 9's</b> suggestion that the existing strategy, policies and allocations will be reviewed as part of the emerging plan in light of</p>	

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			<p>the clear deficiencies with the current strategy that has resulted in a significant under-delivery of housing in recent years.</p> <p>Whilst a review of the current approach should naturally be explored, a holistic approach needs to be undertaken when formulating the new spatial strategy. It will be important to make sure the approach to developing the spatial strategy is done through a comprehensive and iterative assessment of <i>all</i> potential locational options.</p> <p><b>Paragraph 10</b> sets out the proposed strategic policies that will be contained in the Local Plan. We are broadly supportive of the list provided. Specifically, we support the consideration of Green Belt releases to meet the Council's housing requirement.</p> <p>Given that the Green Belt designation affects around 40% of the entire district and these areas, by virtue of their proximity to Bristol, tend to be among the more sustainable locations, we would suggest that it is likely that exceptional circumstances will be demonstrated to release land from the Green Belt when the relative sustainability credentials of spatial options are assessed as part of the SA.</p> <p>In order to support any releases, a full Green Belt review will need to be undertaken to understand potential areas that could be released and to understand which sites would be the most preferable in Green Belt terms (e.g. by assessing the contribution they make to the five purposes set out at paragraph 134 of the NPPF).</p> <p>Consideration to whether exceptional circumstances exist needs to be given consideration early in the preparation of the plan process and this will need to be either followed by/done in tandem with a review of the Green Belt.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>We also note that the Plan is proposed to include both strategic policies identifying broad locations for growth within an overarching strategy alongside formal allocations and development management policies.</p> <p>Whilst we do not object to this structure in principle, it will be important for both of these areas to be covered in a singular plan that will be in place by 2023 (or as close to this date as soon as possible) in order to ensure that housing delivery will not be impeded any longer than it needs to be.</p> <p>We note that the PCD and Local Development Scheme (LDS) indicate the Council's intention for this plan to include site allocations and we are supportive of this approach. However, we would not support the adoption of a strategic level plan in the short-term, to be followed by an allocations plan given that it is imperative that housing is delivered in the shorter-term.</p> <p><b>Relationship to Neighbourhood Planning – Paragraphs 13-16</b></p> <p>The Council notes that as the new Local Plan progresses, the strategic policy context in which in which Neighbourhood Plans exist will also change, potentially rendering them out of date.</p> <p>Whilst the Council's proposal to set out the housing requirement on a parish basis in the strategic policies may provide clarity, we would stress that this needs to be justified in the context of the overall spatial strategy.</p> <p>We welcome the Council's suggestion that they will engage with relevant stakeholders to ensure that any neighbourhood plans will be progressed in tandem with the emerging Local Plan and achieve consistency between the two.</p> <p><b>Sustainability Appraisal – Paragraph 17</b></p>	

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			<p>We have responded in detail to the Sustainability Appraisal (SA) Scoping Report in Section 3 below.</p> <p><b>Timescales – Paragraph 18</b></p> <p>We welcome the Council's proposed timetable and consider it to be ambitious in terms of the proposed adoption date. Whilst we are keen to ensure the Plan is adopted as quickly as possible, it will also be important to ensure the Plan is robust, justified and soundly prepared. Given the work that will be required, we are concerned that this timetable may well slip.</p> <p>Furthermore, we are mindful that the proposed timetable and plan period leave no real headroom to be confident that Paragraph 22 of the NPPF will be complied with. Any delay to the Local Plan's preparation could result in the proposed Plan falling foul of 15-year requirement for strategic policies. We would, therefore, urge the Council to reconsider the proposed plan period to account for this risk.</p> <p>As suggested above, a plan period that covers a longer period (we suggest 2018-2041) would allow the new plan to mitigate against the failings of the adopted plan, whilst still complying with NPPF upon adoption, even in the event of programme slippage.</p> <p><b>SUSTAINABILITY APPRAISAL SCOPING REPORT</b></p> <p>The Council have also published a Sustainability Assessment Scoping Report alongside the PCD. The purpose of the document is to set out a framework to guide the assessment of spatial strategy options, sites and policies of the new Local Plan. This will assist with the understanding of the impacts of the potential options in environmental, social and economic terms. A preferred</p>	

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			<p>spatial option will then be identified within the draft Local Plan, prior to its submission to the Inspectorate.</p> <p>Paragraph xii provides a list of questions that the Council are specifically seeking responses to as part of the current consultation. We have no comment to make in respect of Questions 1, 2 and 5 but have provided the following response to Questions 3 and 4 below.</p> <p><u>Question 3 – Are there any additional sustainability issues within North Somerset that need to be considered in the development of the new Local Plan?</u></p> <p><i>Deliverability</i></p> <p>Whilst the sustainability issues listed provide a relatively comprehensive overview of the key issues affecting North Somerset, we consider that the issue of delivery/deliverability has been underplayed in the identification of important issues.</p> <p>As we have alluded to previously in the representations, the adopted Local Plan has failed to deliver the necessary homes, employment floorspace and supporting infrastructure for a number of years.</p> <p>This has been manifested in the Council's housing supply and delivery record of the plan period to date. On the matter of supply, the Council's stated position that it can demonstrate a 4.4 years supply of housing land is extraordinarily tenuous when other estimates indicate that it could be as low as 1.69 years when properly assessed against national guidance.<sup>1</sup> Indeed, it is important to note that the Council's position, regardless of the actual level of supply, has had to be underpinned in recent years by speculative development across the district, thus reinforcing the ineffectiveness of the adopted plan and its proposed site allocations.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>Furthermore, the housing delivery test results also make poor reading for the Council, showing that they have only delivered 78% of their housing requirement over the past 3 years. Again, this highlights the fact that the Council's current strategy has been woefully deficient in meeting its delivery needs over the current plan period.</p> <p>The knock-on impact of the failure to maintain an adequate supply of housing land and deliver the minimum housing requirement over a number of years has hindered the ability of the adopted plan to deliver its aspirations (e.g. reductions in out-commuting) and had adverse impacts on important social issues (e.g. housing affordability). The deliverability of a plan, allocation or policy is an important consideration given that there can be significant environmental, social and/or economic consequences if it cannot be implemented. This should, therefore, be a significant factor in their assessment as part of the sustainability appraisal and we do not consider that this has been explored sufficiently within the Scoping Report.</p> <p><i>Green Belt</i></p> <p>We welcome the absence of any reference to the need to protect the Green Belt for the purposes of assessing the sustainability of spatial options. Whilst we agree that the Green Belt is an important national designation and that it should be protected in line with the provisions of the NPPF and PPG, it is not an environmental, ecological or landscape designation that is, necessarily, any less <i>sustainable</i> to build on than land outside of the Green Belt.</p> <p>In simple terms, Green Belt land is no more/less sustainable to develop than non-Green Belt land and this should be reflected in the SA, as it currently appears it will be.</p>	



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			<p>Furthermore, it is important to consider the sustainability credentials of strategies that both do and do not involve the release of Green Belt land in order to demonstrate that exceptional circumstances exist to amend Green Belt boundaries. There are significant amounts of Green Belt land in highly sustainable locations. These locations include, to the south-west of Bristol, Portishead and other key service centres on important transit routes to/from these larger settlements – e.g. Easton-in-Gordano and Long Ashton. The sustainability appraisal will likely show that there are significant sustainability benefits to delivering development in these locations, relative to spatial options that do not. This, in turn, can support an argument to release land from the Green Belt to meet development needs in line with national policy/guidance.</p> <p><u>Question 4 - Do you agree with the proposed Sustainability Appraisal Framework?</u></p> <p>We are generally supportive of the Sustainability Appraisal Framework and, following on from our comments above, welcome the absence of any impacts on the Green Belt from the assessment of a site's sustainability credentials.</p> <p>However, following on from our comments regarding deliverability, we consider that this should be more prominent within any assessment.</p> <p>We note that delivery is touched upon at SA Objectives 1.5 and 2.1 and we welcome this acknowledgement. However, for the reasons set out above, we consider that deliverability should be a stand-alone SA Objective within the framework.</p> <p><b>LAND OFF COLLITERS WAY, HIGHRIDGE</b></p> <p>As stated above, Land Off Colliters Way, Highridge is located on the southwest edge of Bristol. Barratt Homes have an interest in land in this area as shown on</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>the below plan (see attached). The wider site (i.e. all remaining undeveloped land contained by Colliters Way, Bridgwater Road and the built-up area of Bristol) is controlled by the Wring Family and Taylor Wimpey.</p> <p>The land controlled by Barratt and the Wring Family falls within the administrative boundary of North Somerset, whilst the land controlled by Taylor Wimpey falls within the administrative boundary of Bristol City Council.</p> <p>There are three principal arguments in favour of allocating development in this location. These are discussed below.</p> <p><b>1. Exceptional circumstances will likely be demonstrable and justify development in the Green Belt</b></p> <p>As set out above, we consider it likely that the Sustainability Appraisal, if undertaken fairly and consistently will highlight the sustainability benefits of delivering development at specific locations within the Green Belt versus non-Green Belt location. These benefits would be sufficiently substantial to constitute the exceptional circumstances that would justify the release of Green Belt land for development.</p> <p><b>2. The site is a fundamentally sustainable location for development and can deliver considerable benefits</b></p> <p>All three sites highlighted in Figure 2 would be capable of delivering c. 400 dwellings alongside appropriate levels of open space and supporting infrastructure. Barratt Homes' land has potential to deliver c. 220 of these dwellings.</p>	

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			<p>The site is located on the southern edge of Bristol and has access to an excellent range of services, facilities, employment opportunities and public transport connections.</p> <p>The delivery of the site for development would also yield the following benefits for the community:</p> <ul style="list-style-type: none"> <li>• Delivery of up to 400 dwellings (c. 275 within North Somerset’s boundary);</li> <li>• Substantial gains for social infrastructure;</li> <li>• Highly sustainable location with good access to existing and future transport connections (e.g. Long Ashton Park and Ride, Metrobus M1 extension along the South Bristol Link Road etc);</li> <li>• Good access to facilities and services in the locality and the extensive services and facilities within Bristol City Centre;</li> <li>• Technical Transport, Heritage, Landscape, Ecological and Drainage work undertaken has revealed no significant constraints to development;</li> <li>• Deliverable promptly within short timescales due to the backing by major housebuilders.</li> </ul> <p><b>3. The site is poor-quality Green Belt land</b></p> <p>The site is in the Green Belt but is contained by the South Bristol Link Road which has had the effect of significantly reducing its effectiveness in Green belt terms. Furthermore, the delivery of the South Bristol Link Road (SBLR) has created a new defensible and logical boundary to which the Green Belt could be extended and secured for the longer term.</p>	

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			<p>The three cells now contained by the South Bristol Link Road (59b, 68b and 69e) were all rated as making a limited contribution to the key purposes of the Green Belt. To quote the JSP Green Belt review, it states:</p> <p><i>“In these locations, covering a total of 122 hectares, the assessment has found that the cells are contained to some extent by surrounding development. The new transport infrastructure, which was under construction at the time of the assessment, has separated small areas of land from the wider countryside to the east. This was found to impact on whether the Green Belt boundary could endure beyond the plan period because the construction of the MetroBus/South Bristol Link has created a more defensible boundary feature close to the urban area. The assessment notes that some parts of these cells, such as Bedminster Down, are open and visually prominent containing locally important open space, but that the cells had a limited contribution in terms of the purposes of Breen Belt.”</i></p> <p>Indeed, this assessment has already led to both North Somerset and Bristol City Councils floating the idea of allocating the site for development within emerging Local Plans.</p> <p><u>Technical Delivery Document</u></p> <p>As part of the site's promotion through the previously emerging Local Plan, a Technical Delivery Document was prepared in support of the site which elaborates on the above points.</p> <p>Although the planning policy section was written in the context of the JSP and previously emerging Local Plan coming forward, we have attached it again for reference. This will likely be updated and submitted to the Council for consideration once the new Local Plan has sufficiently progressed.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p><u>Summary</u></p> <p>Taken together, the site constitutes an excellent contender for allocation in the new Local Plan, subject to exceptional circumstances being demonstrated to justify its release from the Green Belt</p> <p>We look forward to working proactively with the Council in promoting the site for development as the new Local Plan progresses.</p>	
Flax Bourton Parish Council	Flax Bourton PC		<p>These representations are made by Flax Bourton Parish Council (FBPC) in response to North Somerset Council's (NSC) consultation on their Pre - Commencement Document to the Local Plan for North Somerset 2023–2038.</p> <p>Flax Bourton is a village of 300 households located on and dissected by the A370. The A370 through Flax Bourton is limited by bends and width restrictions which are reflected in a 30mph speed limit and the provision of a narrow pavement along one side of the road alone. The A370 is a major commuter route to and from Bristol so transport is a major issue for FBPC. A Local Plan which allows development which creates increased unsustainable levels of traffic and congestion causing air quality and environmental damage to our community will be resisted.</p> <p>FBPC welcomes NSC's decision to withdraw from the West of England JSP and to instead proceed with a Local Plan. FBPC supports the outlined Proposed Strategic Policies set out by NSC.</p> <p>FBPC wishes to ensure that the Pre- Commencement Document and the Sustainability Appraisal Scoping Report encompass accurate, up to date and properly modelled Transport and Sustainability Assessments unlike those which</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>the JSP process revealed as being flawed. We would, for example, be extremely concerned if NSC felt it could rely on previously commissioned transport evidence which transport experts at the JSP hearings heavily criticised.</p> <p>The Pre-Commencement Document Duty to co-operate must deliver early discussions with strategic policy making authorities and businesses and other prescribed bodies including Highways England, Network Rail, Train Operating Companies and Bus Companies as an early basis of transport policy. There must be an evidence base to assumptions previously contained in the JSP that, for example, Nailsea and Backwell Station can deliver higher passenger numbers to reduce car journeys. Also early evidence is needed of Motorway junction capacity, Bus route commercial feasibility and delivery of road congestion mitigation BEFORE development locations are identified.</p> <p>Duty to Co Operate also means that all documents and reports in the Local Plan process are available for public consultation. The JSP and the current JLTP4 refer in appendices to the BSWEL Report which is still being withheld from the public. Either this document must be placed in the public domain or it must be removed from the Local Plan process. NSC must ensure the process is open and transparent.</p>	
Murray Stewart	Abbots Leigh Parish Council		<p><b>NORTH SOMERSET LOCAL PLAN 2038 Pre-commencement Document March 2020</b></p> <p>The Parish Councils of Abbots Leigh and Pill and Easton-in-Gordano have been jointly preparing a Neighbourhood Plan covering the whole area of the two parishes (from Beggar Bush to the Severn Estuary). This submission comes with the approval of both parish councils. The Plan is now complete and is</p>	<p><a href="#">Neighbourhood Plan 2020-2026 March 2020.pdf</a></p>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>available for local consultation at <a href="#">[1]</a>, although as a consequence of Covid 19 that consultation has been extended until the autumn or perhaps later.</p> <p>Following the withdrawal of the Joint Spatial Plan our Neighbourhood Plan as submitted for local consultation conforms to the Amended Local Plan 2017 and the North Somerset Core Strategy adopted in 2018. The time-scale of our plan and its proposals relate only to the period to 2026.</p> <p>At the same time, however, much of the thinking behind the 2026 Neighbourhood Plan related to the longer term and a number of the issues explored, particularly the Housing Strategy, will be applicable to the fifteen years 2023-38. Indeed the majority of the issues identified in para 12 of the pre-commencement document are addressed in some way in our 2020-2026 Plan, and both the analysis and many of the planning policies and community actions proposed might well apply to the new 2023-2038 period.</p> <p>Given all the delays in developing a strategic framework and the uncertainties that now exist about planning and housing, we therefore welcome the NSC decision to move ahead with the 2023-2038 Local Plan and support the Timetable and Milestones proposed (although the impact of Covid 19 may of course affect this timing).</p> <p>We also welcome recognition of the significance of the 2038 Plan for Neighbourhood Planning. Our Plan makes a commitment to update and/or review in 2023 or soon after, and we thus look forward to the opportunity for consultation as to how the Abbots Leigh, Ham Green, Pill and Easton-in-Gordano Neighbourhood Plan and the 2038 North Somerset Local Plan can progress in tandem. It seems likely that our final submission to NSC will be able to draw on the Issues and Options Consultation and the Draft Plan. In any case it is now not possible to have an NP referendum until May 2021.</p>	

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			<p>Murray Stewart Neighbourhood Plan co-ordinator for Abbots Leigh and Pill/Easton-in-Gordano Parish Councils.</p> <p><a href="#">[1]</a> The Neighbourhood Plan is attached as a separate document to this submission.</p>	
Esteban Investments Limited		Lichfields (Owain Nedin)	<p>We write in response to the published consultation document ‘North Somerset Local Plan – Pre-commencement Document March 2020’ on behalf of Esteban Investments Limited.</p> <p>Esteban Investments Limited are the owners of land in Ashton Vale, to the south east of the Long Ashton metro bus park and ride. The majority of the land is within Bristol City Councils administrative area, and as you will know, was allocated for development (c. 500 residential units) and proposed to be released from Green Belt (draft Policies DS10 and DS11) in the Bristol City Council Draft Local Plan. The land to the very north west of this site falls within North Somerset Councils administrative area.</p> <p>We are pleased to note that your consultation document considers the duty to co-operate with neighbouring authorities, the need to consider options for Green Belt release and the overriding need to deliver housing. We trust that the emerging allocation in Bristol’s Local Plan will be taken into account when considering NSC’s Local Plan response to this location.</p> <p>We request that we are added to the database and kept informed of future consultation events associated with North Somerset Council’s emerging Local Plan.</p>	<p><a href="#">land south east of metrobus PandR.PDF</a></p>



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wwarden			<p>This is a brief comment on the Local Plan ‘Pre-commencement Document’, although more so on the timescale rather than the background and policy basis. I have no comment to offer on the latter, which appears straightforward.</p> <p>It should be self-evident but circumstances have obviously changed quite fundamentally since the Document and Local Plan timetable were prepared. Of course, we now don’t know what the immediate or even mid-term future holds and I suggest that it would be unrealistic to proceed as suggested in the Document.</p> <p>You will appreciate that the future for the economy, employment, housing demand, traffic and transport and other relevant factors is now very uncertain. In the circumstances, I propose that the next phase, the Issues &amp; Options Consultation, is deferred for at least six months, which should allow time for both local review by NSC and the possibility of re-definition of national policy. Postponement for a year would be better but six months might still allow for the original Adoption target to be met.</p> <p>I’ve looked at the Town and Country Planning (Local Planning) (England) Regulations 2012 and other relevant legislation and can’t see any reason why this shouldn’t be possible, other than perhaps the 5-year rule. However, Government is likely to agree any relevant revision in the current circumstances.</p> <p>I certainly hope that you don’t now publish the Issues &amp; Options Consultation as originally planned.</p>	

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			<p>Regards</p> <p>David Glynn</p> <p>Wrington</p>	
<p>McCarthy &amp; Stone Retirement Lifestyles Ltd and Churchill Retirement Living</p>		<p>Alex Child</p>	<p>I act on behalf of McCarthy &amp; Stone Retirement Lifestyles Ltd and Churchill Retirement Living, which together are the market leaders in the provision off specialised housing for older people for sale. Thank you for allowing us to comment on the Pre Commencement Document and I trust the observations made will be of assistance and acted upon as you progress the local Plan</p> <p>It is noted that the document refers to the Local Plan considering housing requirement using the standard method as the starting point. This is of course of no surprise</p> <p>The current Local Plan and the SHMA identifies the high level of need for specialised housing for older people in North Somerset and with increasing demand exceeding supply this continues to increase. The NPPG in its section “Housing for older and disabled people” identifies the need to do so as critical, recognising the ageing demographic and the benefits that such developments bring with them, not just for the residents themselves but wider economic and societal benefits not least in addressing isolation and reduces the burden on health and social services.</p> <p>It is therefore recommended that the Plan be drafted to include a policy that specifically encourage the provision of specialist housing for older people as indeed Policy DM40 of the Development Management Plan does presently. Given the need for such housing and the encouragement that is warranted for it,</p>	

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			<p>this should be dealt with as a matter separate from any proposed housing mix policy.</p> <p>It is also submitted that in preparing policies in this regard, that the following should be recognised:</p> <ul style="list-style-type: none"> <li>• That addressing need cannot be achieved through a requirement that a % of housing allocation should simply be for “older people” and additionally that this need may simply be met by the application of the optional standards for wheelchair accessibility and adaptability instead of specialised housing. Such an approach does not deliver on the many benefits of housing designed housing developments for older people. IT will not deliver in meeting wider care , support and social needs (including addressing loneliness and older people are likely to prefer to remain in their own established homes and communities, rather than move to a new and unfamiliar large housing schemes and new communities.</li> <li>• Therefore meeting housing needs for older people should first and foremost be through supporting and actively encouraging windfall developments in established locations</li> <li>• That any affordable housing requirement should recognise that it is inappropriate to mix affordable housing and market housing of this nature in a single block and that % requirements should be based on the need for older persons housing and not overall affordable housing need.</li> <li>• If Viability of Older Persons Housing is to be tested, it should be recognised that this differs markedly from conventional forms of housing and should be assessed accordingly. Given this and that the preferred site for this type of development is a centrally located urban brownfield site, it is submitted that viability testing of an individual</li> </ul>	

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			<p>proposed development should be at the planning application stage, or that policy should at least contain an indication that this will also be permitted at the planning application stage</p> <ul style="list-style-type: none"> <li>• That most Extra Care developments fall within Use Class C2 and assessment of Use Class is not a matter of whether or not units are self-contained</li> </ul> <p>Once more, thank you for allowing the opportunity to comment on the Pre Commencement Document for the Local Plan</p> <p><b>Alex Child</b> <b>Director, The Planning Bureau</b></p>	
J Milward			<p><b>Response from Stop Bristol Airport Expansion (SBAE)</b></p> <p>The Stop Bristol Airport Expansion (SBAE) alliance was formed to oppose the unsustainable expansion of Bristol Airport. It now includes strong links with regional organisations including many North Somerset Parish Councils, <a href="#">Extinction Rebellion Bristol</a>, the <a href="#">Somerset Campaign for the Protection of Rural England</a>, <a href="#">the North Somerset</a> and <a href="#">Bristol Green Parties</a>, <a href="#">Bristol Friends of the Earth</a>, <a href="#">Bristol Clean Air Alliance</a>, <a href="#">My World, My Home students</a>, and the Bristol Airport Parking Community Association (BAPCoG).</p> <ol style="list-style-type: none"> <li>1. We note (point 8 of the Pre-commencement Document) the welcome reference to the strong focus on tackling climate change but we would like to see the Local Plan explicitly recognise North Somerset Council's Declaration of a Climate Emergency in 2019. This Declaration should overtly underpin <u>all</u> aspects of planning policy in the Local Plan, and this should be made clear in <u>all</u> consultation</li> </ol>	

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			<p>documents. Otherwise there is no point in declaring a Climate Emergency, as it will simply be seen as paying lip service to current popular sentiment.</p> <p>2. We would also like to see Bristol Airport, and its associated issues such as transport infrastructure, unauthorised off-site parking and carbon emissions, highlighted as a 'proposed strategic policy' in its own right in section 10 of the Pre-commencement Document. The massive response to the recent planning application to expand passengers to 12 million per annum at Bristol Airport and the recent High Court decision confirming the illegality of the proposed third Heathrow runway demand that major sub-regional infrastructure proposals such as airport expansion are now treated as key Local Plan policy topics in their own right. The inherent relationship of Bristol Airport to a wide range of inter-related economic, social and environmental issues means that it can no longer exist as an adjunct to a single planning policy but should be approached as a free-standing planning challenge in this Local Plan.</p> <p>If you have any queries, please do not hesitate to contact me.</p> <p>Yours sincerely, Justin Milward - for SBAE</p>	
Bleadon BOB Community Website	Bleadon BOB Community Website		<p>Please find below our comments on the North Somerset Local Plan: Pre-commencement Document (March 2020).</p> <p>Firstly, we believe that there should be an extension to this consultation as, due to COVID19, many Parish Councils, like Bleadon, have not publicly discussed</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>this consultation with the residents they represent, and/or presumably each other.</p> <p>The consultation states, <i>“To provide clarity for future neighbourhood plans, the Local Plan will identify the housing requirements on a parish basis in the strategic policies ...”</i></p> <p>The NPPF states, <i>"In setting requirements for housing in designated neighbourhood areas, plan-making authorities should consider the areas or assets of particular importance (as set out in paragraph 11, footnote 6), which may restrict the scale, type or distribution of development in a neighbourhood plan area."</i></p> <p>It is therefore hoped that the future NSC Local Plan will:</p> <ul style="list-style-type: none"> <li>• Continue to protect existing settlements, such as Bleadon's ancient Bronze Age settlement, keeping its existing settlement boundary with development constrained within it, and to protect the surrounding countryside, landscape and views that give Bleadon its rural character.</li> <li>• Consider providing a 'Strategic Gap' between Bleadon and WSM, like its fellow Ward members Hutton &amp; Locking, to protect the Bleadon Levels, Bleadon Moor and fields in the parish, that give and protect and Bleadon's rural character and settlement/infill village status.</li> <li>• Continue to protect Bleadon's substantial, and some rare, habitats, flora and fauna e.g. grasslands, plants, wetlands, otters, bats, voles, newts, badgers, birds of prey, etc. wildlife reserves, e.g. Hellenge, Purn, and protected areas such SNCIs (E.g. Coombe Farm, Purn Hill, River Axe, Bleadon Hill, South Hill, Hellenge Hill to Loxton Wood Complex, Land West of Christon Plantation, Canada Coombe Scarp), SSSIs (e.g. Hellenge, Purn, Shiplate Slate, Axe), AONB (Mendip Hills), SAC, groundwater drinking sources, etc.,</li> </ul>	

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			<ul style="list-style-type: none"> <li>• Continue to protect other historical aspects of the village e.g., Listed buildings (Village Well, St. Peter &amp; St Paul's Church, Purn House Farm, Hillside Farmhouse), TPOs, 20 PROWs, Common Land &amp; Village Greens (Purn Quarry, Village Green, Parish Cross area)</li> <li>• In view of above, consider providing a conservation area for certain aspects of the parish and village e.g Bleadon Levels, Bleadon Moors, orchards, etc.</li> <li>• Consider reviewing the green belt around Bristol to protect rural communities, including Bleadon, to provide for urban communities and economy nearer it's employment and commuter source, and thereby also reduce any resulting carbon footprint especially due to transportation issues.</li> <li>• Continue to protect the air above us from noise and chemical pollution, and continue to refuse the Bristol Airport Expansion, now also in relation to the spread of pandemic outbreaks.</li> <li>• Continue to protect our precious water, and climate change, by continuing to discourage the exploration and development of fossil fuels (including fracking) within North Somerset.</li> </ul> <p>The NPPF also states, "<i>Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area ... Housing requirement figures for neighbourhood plan areas are not binding as neighbourhood planning groups are not required to plan for housing. However, there is an expectation that housing requirement figures will be set in strategic polices, or an indicative figure provided on request.</i>" We ask that NSC take the above unique local circumstances into consideration when setting any housing requirement for the Parish of Bleadon. Please can you explain what will happen if a community does not agree with the housing requirement set for its Parish, how can residents</p>	

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			request a review? What happens if a 'quota' is set and the developers building in the parish do not delivery it?	
Congresbury Parish Council	Congresbury Parish Council		<p><b>Response from Congresbury Parish Council 22<sup>nd</sup> April 2020</b></p> <p>1 Congresbury Parish Council wishes to endorse and support the two separate responses submitted by Mr Tom Leimdorfer who was the previous Ward Councillor for Congresbury until standing down in May 2019 and the response from Congresbury Residents Action Group (CRAG) who represent the residents of Congresbury.</p> <p>2 Congresbury Parish Council would wish that the adopted Congresbury Neighbourhood Plan 2019 – 2036 to be taken into account when the consultation document is prepared. This was confirmed and adopted by North Somerset Council in 2019 when it received a massive endorsement from the residents of Congresbury.</p> <p>3 Arising from the preparation of the Congresbury Neighbourhood Plan it was apparent that the plan could only be effective if the JSP also echoed and reflected the core aspirations of the Village. To this end there have been a number of associated matters that reflect directly on Congresbury and its residents.</p> <p>4 Firstly, the Bristol Airport expansion seemed to be supported at National and Regional level and the planning and government directives favoured its development. This was in direct contrast to the views of the people who live in the Village and suffer from the existing traffic, noise and pollution. Fortunately, at the NSC Planning and Regulatory Committee there was sufficient support to reject the plan. The outcome of this shows that the present policies are</p>	<p><a href="#">JSP - Response to Pre Commencement DocumentApril2020.pdf</a></p>



Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>fundamentally flawed. If nothing else the issues highlighted by the objectors must be taken into account and included in the new JSP.</p> <p>5 Although paragraph 8 makes reference to sustainable development although there is some reference to a scoping document it is the most pressing of all the factors that need to be properly taken into account. We have the government making commitments and setting targets to become zero carbon by 2050 whilst at the same time allowing and condoning development that is destroying our planet. Sustainability must be afforded a far greater importance that what appears to be the case in the Pre Commencement Document.</p> <p>6 Congresbury has no wish to be a NIMBY Village but it does, by its location, become the victim of development undertaken elsewhere. The whole of the District has what can only be described as a rural infrastructure. The adage that you cannot get a quart into a pint pot is how best to describe the present provision. The lack of community logic dictates that any development has to squeeze into what already exists. Again, taking Congresbury as the example of cause and effect our roads are already at saturation level. But because of the tunnel thinking huge developments outside of the Village are allowed to happen. This inevitably results in delays and frustration for those who live outside of the Village as well as our residents all trying to use what is little better than a cart track.</p> <p>7 Greater and far better understanding and research has to be used than is currently applied when deciding the JSP. A holistic approach has to be adopted and implemented. We are all involved and not just developers.</p> <p>8 As a Village we set the environment high on our agenda. This is not given the weight and importance it deserves in the JSP. What we have is precious and unique. Heritage and social wellbeing seem to have been swept aside and must form the larger picture.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>9 The current Covid – 19 crisis has to be a wake up call. Added to the Climate Change crisis the JSP will need to demonstrate how it can plan for an uncertain future. The extravagance and ignorance of the past must be stopped. We are in a new order and a new way of thinking and planning for our future.</p> <p>10 Congresbury is able to meet the challenge but not if the JSP is blinkered and short sighted and totally oblivious to the crisis we face. We look forward to commenting on the next round of consultations.</p> <p>Cllr M J Greaves Chairman Planning Committee Congresbury Parish Council</p>	
Bristol Airport	Bristol Airport		<p><b>NORTH SOMERSET LOCAL PLAN PRE-COMMENCEMENT DOCUMENT AND SUSTAINABILITY APPRAISAL SCOPING REPORT: REPRESENTATION OF BRISTOL AIRPORT LIMITED</b></p> <p><b>1. Introduction</b></p> <p>Bristol Airport Limited (BAL) welcomes this opportunity to provide comment on the North Somerset Local Plan Pre-Commencement Document (March 2020) (hereafter referred to as the ‘Pre-Commencement Document’). We recognise the important role Bristol Airport plays in the economic success of North Somerset and the wider region and we are therefore pleased to support the Council in preparing a new Local Plan for the future of North Somerset to 2038.</p>	<p><a href="#">20200423 - Local Plan Rep (FINAL).pdf</a></p>

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			<p>Bristol Airport is located on the A38, approximately 11km south-west of Bristol city centre and within the local authority administrative area of NSC. Operated by BAL, it is the principal airport and international gateway for the South West of England and South Wales; in 2019, Bristol Airport handled over 8.9 million passengers making it the eighth busiest UK airport and the third largest regional airport in England. Bristol Airport makes a significant economic and social contribution to North Somerset and the wider South West region, providing jobs and connectivity to stimulate growth and regeneration. In 2019, Bristol Airport employed circa 4,000 people, which represents around 3% of all jobs in North Somerset, and the airport also plays a vital role in supporting the prosperity of local businesses including in the tourism sector.</p> <p>BAL forecasts that passenger demand will exceed the permitted planning cap of 10 million passenger per annum (mppa) early in the proposed Local Plan period. To meet passenger demand both now and into the future, BAL is currently preparing a new Master Plan. The Master Plan will set out a strategy for phased growth up to 12 mppa and beyond in order to meet the forecast level of passenger demand, balancing the environmental, economic and social impacts; in doing so, it will ensure that Bristol Airport contributes fully to growing national airport capacity, delivering increased connectivity and supporting economic prosperity in North Somerset and the wider South West region. Through the new Local Plan, there is an opportunity for NSC to provide a positive policy framework that supports Bristol Airport in accordance with the emerging Master Plan. In turn, this will help to ensure that airport growth acts as a major catalyst for economic development and delivers further investment in strategic, surface access infrastructure. In this regard, we note that the Employment Land Review (2018) prepared in support of the Local Plan states that "<i>Bristol Airport presents a very significant economic</i></p>	

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			<p><i>opportunity that could act as a ‘game-changer’ for North Somerset if it expanded”</i>. We would concur with this statement and stress that it is critical that an appropriate policy framework is put in place to help realise this potential.</p> <p>Our response to the Pre-Commencement Document has been prepared in this context and focuses on the following aspects of the consultation: Strategic Policies (Section 3); Green Belt (Section 4); and the preparation of the Local Plan in terms of the Duty to Co-operate and the evidence base (Section 5). In preparing our response, we have also taken the opportunity to review and provide comment on the Sustainability Appraisal (SA) Scoping Report (March 2020) (see Section 6)</p> <p><b>2. Context</b></p> <p>National Aviation Policy</p> <p>The Aviation Policy Framework (APF) (March 2013) establishes the Government’s high-level objectives and policy on aviation. It recognises that <i>"airports in Northern Ireland, Scotland, Wales and English airports outside of London play an important role in UK connectivity"</i> and there is general support for the growth of regional airports, with the APF highlighting that <i>"new or more frequent international connections attract business activity, boosting the economy of the region and providing new opportunities and better access to new markets for existing businesses"</i>. Beyond the Horizon – The Future of UK Aviation: Making Best Use of Existing Runways (June 2018) confirms</p>	

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			<p>Government's support for airports beyond Heathrow making best use of their existing runways.</p> <p>The Government is currently preparing an Aviation Strategy that will set out the long-term direction for aviation policy to 2050 and beyond. The Green Paper, Aviation 2050: The Future of UK Aviation (December 2018), supports the growth of regional airports such as Bristol as a catalyst for regional economic development and connectivity. At paragraph 4.4, it states:</p> <p><i>"Airports have a crucial role to play in their regions. They are hubs for growth within and beyond the region in which they are situated. Local airports, such as Newquay, Norwich and Prestwick serve their immediate catchment area, offering domestic and short-haul destinations. Regional airports, such as Bristol, Belfast International, Newcastle and Glasgow, serve larger catchments and offer extensive short-haul network and some key long-haul routes, providing their regions with access to global markets".</i></p> <p>National Planning Policy Framework</p> <p>The National Planning Policy Framework (NPPF) (February 2019) affords significant weight to the need to support economic growth and at paragraph 80 states that <i>"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development."</i> With specific regard to transport, meanwhile, paragraph 104 (e) of the NPPF sets out that planning policies</p>	

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			<p><i>should: "provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy".</i></p> <p>Development Plan</p> <p>Policy CS23 of the North Somerset Core Strategy and Policy DM50 of the Sites and Policies Plan Part 1 are the principal Development Plan policies relating to development proposals at Bristol Airport. They establish that proposals for the further development of the airport will be required to demonstrate the satisfactory resolution of environmental issues, including the impact of growth on surrounding communities and surface access infrastructure.</p> <p>The Development Plan proposals map defines an inset that excludes the northern side of Bristol Airport's operational area from the Green Belt. Core Strategy Policy CS6 sets out that amendments to the Green Belt boundary at Bristol Airport will only be considered once long-term development needs have been identified and exceptional circumstances demonstrated.</p> <p>Bristol Airport Master Plan</p> <p>The APF recommends that airport master plans are periodically updated to "<i>provide a clear statement of intent on the part of an airport operator to enable future development of the airport to be given due consideration in local planning processes</i>". In accordance with Government guidance and in response to forecast passenger growth, BAL is currently preparing a new Master Plan for Bristol Airport.</p>	

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			<p>BAL's broad approach to long-term growth was set out in an initial discussion document, 'Your Airport, Your Views', which was subject to public consultation between November 2017 and January 2018. The second stage of non-statutory consultation on the emerging Master Plan took place between May and July 2018. Taking into account consultation responses and new evidence, BAL intends to publish its final Master Plan in winter 2020/21.</p> <p>Importantly, the Master Plan is designed to inform the preparation of the new Local Plan by clearly establishing the long-term development needs of the airport. In this regard, we note the Council's response to the most recent Master Plan consultation which recognised that Bristol Airport is an essential part of the region's transport network and plays a significant role in the regional economy. We also note and welcome that the Council is looking to work closely with BAL in order to maximise the benefits that the airport's future growth can bring to North Somerset and the West of England as the region's main airport and to ensure <b>that the impacts of any future expansion are fully assessed, understood and mitigated.</b></p> <p><b>3. Strategic Policies</b></p> <p>Paragraph 10 of the Pre-Commencement Document details the strategic policies to be contained in the Local Plan. BAL understands that these policies may identify broad locations for development, but that it is not anticipated that they will include site allocations (these will be set out in the non-strategic policy section of the Local Plan). Recognising that the policy wording has not yet been developed, BAL has the following initial comments on the proposed strategic policies:</p> <ul style="list-style-type: none"> <li>• <b>Spatial Strategy:</b> The Aviation Green Paper sets out at paragraph 4.32 that "<i>Increasingly airports are becoming</i></li> </ul>	

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			<p><i>regional transport hubs which support multiple businesses, labour markets, and population centres. Their development needs to be planned in that context and included in relevant regional, spatial, and economic development strategies".</i> Reflecting the Green Paper, and as a key strategic regional and sub-regional infrastructure asset and economic driver, Bristol Airport should be an important consideration in the development of the Spatial Strategy for the Local Plan. It is essential that the Local Plan positively plans for the development of Bristol Airport and associated surface access requirements in a coordinated manner with other uses.</p> <ul style="list-style-type: none"> <li>• <b>Infrastructure:</b> BAL welcomes the intent for the Local Plan to identify strategic infrastructure proposals. As highlighted in Section 2 of our response, national aviation policy provides support for the growth of regional airports and making the best use of existing airport capacity including at Bristol Airport whilst the NPPF requires that plans make provision for large scale transport facilities. The future growth of Bristol Airport beyond its current permitted passenger cap of 10 mppa is a strategic infrastructure matter that should be reflected in the infrastructure policies of the Local Plan, both in terms of the long-term development of the airport over the plan period and the surface access improvements necessary to accommodate growth, linked to the Joint Local Transport Plan 4 (JLTP) (March 2020). In this regard, the</li> </ul>	



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			<p>Employment Land Review (2018) sets out that the growth of Bristol Airport "<i>if accompanied with major infrastructure investment, could help to generate significant economic benefits for North Somerset</i>". Further, we consider that wider connectivity issues should be an important matter for consideration in developing the Local Plan.</p> <ul style="list-style-type: none"> <li>• <b>Green Belt:</b> We note that the Council is to consider whether there are exceptional circumstances to warrant a review of the Green Belt in the plan area. BAL considers that such exceptional circumstances exist to support an amendment to the Green Belt boundary in the vicinity of Bristol Airport and, in turn, to ensure that the long-term development needs of the airport can be accommodated. These exceptional circumstances are outlined in Section 4.</li> <li>• <b>Employment:</b> BAL welcomes the intent for the new Local Plan to deliver employment land and to consider the role of the airport in this context. As highlighted in Section 1 of our response, the Employment Land Review (2018) states that "<i>Bristol Airport presents a very significant economic opportunity that could act as a 'game-changer' for North Somerset if it expanded</i>" and we welcome the Council's response to the most recent draft Master Plan consultation which set out that growth will generate both direct economic benefits (as a result of employment opportunities associated with expanded facilities and improved</li> </ul>	

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			<p>infrastructure) and indirect economic benefits (through the agglomeration potential of a regional hub airport). As a major gateway to the South West, a key strategic employment location and driver of economic development, it is essential that the continued growth of Bristol Airport is recognised and supported in the new Local Plan and capitalised upon to boost economic development and connectivity.</p> <p>BAL considers that specific, strategic policy provision should be made for Bristol Airport, supported by a strategic site allocation. This in-turn would be consistent with the requirement of the NPPF for plans to afford significant weight to the need to support economic growth.</p> <p><b>4. Green Belt</b></p> <p>The current Development Plan defines an inset that excludes land on the northern side of the airfield at Bristol Airport from the Green Belt; land to the south of the existing terminal building, including (inter alia) the runway and the existing Silver Zone long stay car parking area, as well as the A38, is within the Green Belt. As you will be aware, the detailed inset was first established through the North Somerset Replacement Local Plan (2007) in order to accommodate the development requirements of Bristol Airport at that time and was subsequently confirmed through the adoption of the North Somerset Core Strategy (2017) and Sites and Policies Plan Part 1 (2016). The inset principally reflects growth of the airport to 10 mppa and in this context, Policy CS6 of the Core Strategy states that "<i>Further amendments to the Green Belt at</i></p>	

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			<p><i>Bristol Airport will only be considered once long-term development needs have been identified and exceptional circumstances demonstrated". .</i></p> <p>Exceptional Circumstances</p> <p>The NPPF (paragraph 136) sets out that Green Belt boundaries should only be amended in exceptional circumstances. The exceptional circumstances that establish the need for changes to the Green Belt boundary in respect of Bristol Airport include:</p> <p><b>i. Openness:</b> The NPPF makes clear that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. At paragraph 134, the NPPF establishes five purposes of including land within the Green Belt, as follows:</p> <ul style="list-style-type: none"> <li>to check the unrestricted sprawl of large built-up areas;</li> <li>to prevent neighbouring towns merging into one another;</li> <li>to assist in safeguarding the countryside from encroachment;</li> <li>to preserve the setting and special character of historic towns; and</li> <li>to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ul> <p>The Green Belt in the vicinity of Bristol Airport only engages one of these purposes in any substance, which is 'to assist in safeguarding the countryside from encroachment.' However, following the implementation of the 10mppa consent and other development proposals, land to the south of the airfield and</p>	

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			<p>within the airport's operational boundary is fully developed and does not, therefore, achieve the overarching aim of Green Belt policy (preserving openness). Further, the principle of development at this location relates to both infrastructure and employment and by its nature, it is not a use or function that can be re-located anywhere else in the Local Plan area, or beyond.</p> <p><b>ii. Forecast passenger growth and the emerging Bristol Airport Master Plan:</b> As set out in Section 1, BAL forecasts that passenger demand will rise over and above 10mppa during the Local Plan period. Our new Master Plan will provide a positive strategy to accommodate this growth and in doing so, it will ensure that Bristol Airport contributes fully to growing national airport capacity, delivering increased connectivity and supporting economic prosperity. However, the airport is constrained by the Green Belt and it is therefore essential that the inset is reviewed in order to ensure that the Local Plan positively plans for the future of the airport and that the Green Belt endures over the plan period and beyond.</p> <p><b>iii. The economic importance of Bristol Airport:</b> Bristol Airport is a significant economic driver within North Somerset, the West of England sub-region, the South West region and South Wales. Around 4,000 people currently work on-site at the airport, currently 3% of the North Somerset working population; including indirect and induced jobs, this increases to over 8,000 FTEs across the South West region. As one of the largest employers in the area, BAL looks to Weston and the towns and villages of North Somerset for a significant proportion of its workforce. Bristol Airport also has a wider economic role in supporting</p>	

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			<p>and facilitating prosperity and regeneration in other sectors. The connectivity provided by the airport enables the flow of trade, investment, people and knowledge that are central to globally successful regions. Bristol Airport also plays a vital role in supporting the tourism sector, providing easy access to overseas markets, notably Germany, Spain, the Irish Republic, Italy and France. In total, it is estimated that Bristol Airport generates £1.7 billion of Gross Value Added (GVA) in the South West economy (as at 2018). Regionally, the Local Enterprise Partnership's Strategic Economic Plan identifies the potential for the growth of Bristol Airport to play a major role in the economic prosperity of the region whilst locally, NSC's Economic Plan recognises the vital role of Bristol Airport to North Somerset's economy and connectivity.</p> <p>As a major gateway to the South West, it is essential that the Green Belt boundary in the vicinity of Bristol Airport is reviewed in order to accommodate the continued operation and growth of the airport. This would be consistent with the evidence provided by the Employment Land Review (2018) which states that "<i>Bristol Airport presents a very significant economic opportunity that could act as a 'game-changer' for North Somerset if it expanded</i>".</p> <p><b>iv. National aviation policy support for regional airport growth:</b> As detailed in Section 2 of our response, national aviation policy provides support for the growth of regional airports and making the best use of existing airport capacity including at Bristol Airport. The Government's emerging Aviation Strategy, meanwhile, supports the growth of regional airports such as Bristol as a catalyst for regional economic development and connectivity. Reviewing the Green Belt in</p>	

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			<p>the vicinity of Bristol Airport would help to ensure that the Local Plan responds to, and is consistent with, the Government’s objective to support the development of regional airports.</p> <p>v. <b>National planning policy:</b> The NPPF affords significant weight to the need to support economic growth and sets out that local plans should make provision for large scale transport infrastructure. Facilitating the growth of Bristol Airport through a review of the Green Belt would be consistent with this policy.</p> <p>vi. <b>The specific contribution Bristol Airport will make to the effectiveness of the Local Plan:</b> Bristol Airport is at the heart of the Local Plan’s ability to deliver its employment growth aspirations. The GVA and FTE figures outlined above demonstrate the significant economic and employment opportunities and benefits that sustainable airport growth will bring, if enabled. When considering the exceptional circumstances that might exist, the airport’s significance to Local Plan effectiveness should be taken into account.</p> <p>Preferred Option for a New Green Belt Boundary</p> <p>The Local Plan 2036 Issues and Options Document (September 2018) highlighted the importance of Bristol Airport as a major employment location and for national and international connectivity. It set out that Development Plan policy relating to the airport needs to be reviewed in light of BAL’s growth ambitions, which BAL welcomed in its consultation response to the document (dated 10<sup>th</sup> December 2018), and</p>	

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			<p>four potential options were put forward for a new policy for Bristol Airport. These options included retaining the existing policy and Green Belt inset or removing the airport area from the Green Belt, with two options to either allocate or safeguard additional Green Belt land for future expansion.</p> <p>In our response to the Issues and Options Document, we set out the reasons why BAL was strongly in favour of Option 4 being taken forward as the preferred option for the development of the airport within the Draft Local Plan. Our position has not changed and on the basis of the exceptional circumstances outlined above, we would urge NSC to take forward Option 4 (although the precise inset boundary may change subject to the finalisation of the Bristol Airport Master Plan). This in-turn will help to ensure that the Local Plan is positively prepared and effective.</p> <p><b>5. Developing the New Local Plan</b></p> <p>Duty to Co-operate</p> <p>We welcome the commitment in the Pre-Commencement Document that NSC will work with the West of England Combined Authority and other bodies to identify and address the strategic issues with cross-boundary implications. It is our view that the development and growth of Bristol Airport over the plan period is one such strategic matter requiring cross-boundary co-operation for the Local Plan to be positively prepared and effective. Current and emerging national aviation policy provides clear support for regional airport growth and Bristol Airport has a critical role as an important international gateway and economic driver for the wider West of England sub-region. Improving surface access to the airport</p>	

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			<p>through, for example, packages supported by the Bristol South West Economic Link project and junction improvements on the M5, is also a critical, cross-boundary issue. This is recognised in the Joint Local Transport Plan and in the Council's response to the Bristol Airport Master Plan, which states that <i>"the improvement of surface access to the airport will be fundamental and it is critical that any plans for future expansion of the airport are seen in the wider context of the strategic growth proposals"</i>.</p> <p>Importantly, the strategic importance of Bristol Airport was recognised in the emerging West of England Joint Spatial Plan (JSP), Policy 4 of which identified Bristol Airport, alongside Bristol Port, as key strategic infrastructure employment locations. In their letter concerning the Examination in Public (EiP) into the JSP (dated 11<sup>th</sup> September 2019), the Inspectors made clear that Bristol Airport and Bristol Port: <i>"are of fundamental and strategic importance to the whole of the West of England and, consequently, any growth at them would also be likely to have implications for the wider employment strategy for the area"</i>.</p> <p>Evidence Base</p> <p>We note that the development of the new Local Plan is to be supported by an evidence base covering (inter alia) infrastructure delivery, transport, economic development and Green Belt; the future role of Bristol Airport and its development needs over the plan period should be a key consideration in the preparation of this evidence. The Bristol Airport Master Plan, which will clearly establish the long-term development needs of the airport, should additionally form a key component of the evidence base for the new Local Plan.</p>	



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			<p>BAL is committed to providing further evidence in due course, working with NSC as appropriate. We would welcome the opportunity to discuss the evidence base requirements for the Local Plan with officers.</p> <p><b>6. Sustainability Appraisal Scoping Report</b></p> <p>We have reviewed the SA Scoping Report and provided below a response to the five consultation questions set out at paragraph 1.22 of the document.</p> <p>1. Have all relevant plans and programmes been referenced?</p> <p>The review of plans and programmes presented at Appendix 1 to the Scoping Report should include reference to the following additional documents:</p> <ul style="list-style-type: none"> <li>• <b>National:</b> The Aviation Policy Framework (2013), Beyond the Horizon – The Future of UK Aviation: Next Steps Towards an Aviation Strategy (2018); Beyond the Horizon – The Future of UK Aviation: Making Best Use of Existing Runways’ (2018); Aviation 2050: The Future of UK Aviation.</li> <li>• <b>Local:</b> The emerging Bristol Airport Master Plan.</li> </ul> <p>Taking into account, and reflecting, the additional plans and programmes outlined above, BAL considers that Section 2 of the Scoping Report should be updated to include specific reference to the need to make provision for the long-term development needs of Bristol Airport, as a catalyst for economic growth.</p> <p>2. Is any significant environmental, social or economic data missing or misrepresented?</p>	

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			<p>BAL considers that the important economic role Bristol Airport plays in North Somerset and the wider region should be recognised in the Economic Baseline (in terms of employment, inward investment, connectivity and GVA) and the Social Baseline (in respect of tourism) sections of the Scoping Report.</p> <p>We note that the Scoping Report includes reference to Bristol Airport under the Environmental Baseline section. The baseline information in this section should be updated to reflect the most recent data in terms of aircraft movements, employment and public transport mode share. BAL would be happy to provide this information if required.</p> <p>At paragraph 3.45, the Scoping Report states that "<i>It is recognised that planned expansion has the potential to impact a range of environmental (and socio-economic) receptors</i>". BAL considers that the baseline section of the Scoping Report is overly focused on the adverse impacts of the airport's operation and growth and does not recognise the potential for these effects to be mitigated. Further, the Scoping Report does not clearly set out the significant economic benefits associated with airport growth and is, therefore, at present unbalanced.</p> <p>3. Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan document?</p> <p>We note that the identified sustainability issues include a single reference to Bristol Airport under the theme 'Pollution'. We consider that the sustainability issues should also recognise and include specific reference to Bristol Airport as a key infrastructure asset and strategic employment site and the potential role of the new Local Plan in providing a positive policy framework for the future of the airport. This could be captured under the theme 'Economic prosperity'. The sustainability issues should also recognise the role of Bristol Airport in</p>	

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			<p>delivering social (including regeneration) benefits (under the theme ‘Inequality’) and the need for the Local Plan to promote investment in transport infrastructure including surface access to Bristol Airport, linked to the JLTP.</p> <p>4. Do you agree with the proposed Sustainability Appraisal Framework?</p> <p>BAL notes the proposed SA Framework contained in Table 13 of the Scoping Report. We have the following comments on the SA objectives and associated criteria:</p> <ul style="list-style-type: none"> <li>• SA Objectives 1.1 to 1.3 and the associated scoring criteria focus predominantly on physical accessibility to jobs and we welcome the identification of Bristol Airport as an area of high employment demand (Appendix 2) in this regard. We consider that the SA Framework would benefit from the inclusion of additional criteria related to: the scale of jobs creation/employment land provision; the promotion of inward investment/increasing competitiveness; and tourism.</li> <li>• SA Objective 1.5 seeks to promote development that is unlikely to create excessive infrastructure requirements. We consider that there should be an additional objective that supports investment in strategic infrastructure.</li> <li>• SA Objective 3.3 seeks to reduce the need to travel by car with criteria focusing on accessibility. We consider that there should be a further SA objective related to investment in transport infrastructure and increasing connectivity.</li> </ul> <p>5. Is the proposed methodology for the next stages of the Sustainability Appraisal correct?</p>	

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			<p>BAL does not have any comments on the methodology for the next stage of the SA at this stage.</p> <p>7. Conclusion</p> <p>The new Local Plan provides an opportunity to ensure that the Development Plan provides a positive planning policy framework for Bristol Airport to contribute to the sustainable growth of North Somerset and the wider region, aligned with the emerging Master Plan. Our representation has set out BAL's initial views on how the new Local Plan should make provision for the airport in this context.</p> <p>We would welcome the opportunity to meet with officers to discuss our representation further.</p>	
Moor Park (North Somerset) Ltd (MP)		Tom Rocke	<p><b>NORTH SOMERSET LOCAL PLAN: PRE-COMMENCEMENT DOCUMENT</b></p> <p>With reference to the above document, I set out below a brief response on behalf of Moor Park (North Somerset) Ltd.</p> <p>My clients simply wish to reiterate the points previously made in response to the Issues and Options Consultation in December 2018, and in particular their response to Questions 1 and 3 and their comments in relation to the Strategic Gaps. I enclose a copy of those previous representations for information, and trust that they will be taken into account in progressing the draft plan.</p> <p>In the Pre-Commencement Document, the proposed strategic policies to be contained in the plan are outlined (at paragraph 10). At bullet 9, there is</p>	<p><a href="#">North Somerset Local Pan 2036_Issues and Options Document.pdf</a></p>

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			<p>reference to strategic gaps between or within settlements. However, given the previous findings of the Site Allocations Plan Examination Inspector, which have been endorsed by Inspectors elsewhere, there is a need to undertake a comprehensive review of whether it is appropriate to continue with the designations given that they have no locus in the NPPF. Moreover, should there be any intention of continuing with them, then there are implications in terms of the delivery of sustainable development that must be assessed through the Sustainability Appraisal of the Plan. As set out in the enclosed representations, the Strategic Gaps are inconsistent with a settlement strategy that seeks to focus the majority of development at the most sustainable settlements.</p> <p>Therefore, the provisions of paragraph 10 of the Consultation Document should not be construed as implying that the emerging plan will contain policies relating to Strategic Gaps, inclusion of which would be in <i>prima facie</i> conflict with the NPPF, and would therefore render it unsound.</p> <p>I would be grateful if you would ensure that my clients details remain within your Local Plan consultation database, and keep me informed of progress on the Plan.</p>	
Mendip Hills AONB Unit	Mendip Hills AONB unit		<p>With reference to North Somerset Local Plan Pre-commencement Document (Regulation 18 consultation), herewith comments from the Mendip Hills AONB.</p> <p>The nationally protected landscape of the Mendip Hills Area of Outstanding Natural Beauty (AONB) covers 198 square kilometres from Bleadon in the west to Chewton Mendip in the east. The AONB partly lies within the North Somerset to the south-west of the</p>	<p><a href="#">Pre-commencement AONB Covering letter Apr2020.doc</a>  <a href="#">NS LP 2023_2038 pre commencement consultation Mendip Hills AONB Apr 2020.docx</a></p>

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			<p>wider Bristol area and south-east of Weston-Super-Mare. Areas of Outstanding Natural Beauty are some of the UK's most cherished and outstanding landscapes.</p> <p>The Countryside and Rights of Way (CRoW) Act 2000 confirmed the significance of the 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 as an Area of Outstanding Natural Beauty. Potential development proposals outside of the boundaries of AONBs that may have an impact within the designated area, are also covered by the 'duty of regard'.</p> <p>The Mendip Hills AONB Partnership produced the Mendip Hills AONB management Plan 2019-2024 as required by the CRoW Act on behalf of the joint local authorities and the Plan has been adopted by North Somerset Council, Bath &amp; North East Somerset Council, Somerset County Council, Sedgemoor District Council and Mendip District Council. The Management Plan under paragraph 1.4 sets out a Statement of Significance on the special qualities of the Mendip Hills AONB that create the Mendip Hills sense of place and identity and these include views from the Mendip Hills AONB, settlements of Mendip stone largely confined to the spring line, retaining dark skies and a sense of tranquillity.</p> <p>As set out in Natural England's National Character Area (NCA) profile for the Mendip Hills (141), the area is 'renowned for its tranquillity and inspirational qualities...' The NCA further recognises that 'Light pollution from development threatens the</p>	

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			<p>extent of the recognised dark skies and out-of-character development is a continuing risk to the essential nature of the area.’ Within the NCA Statement of Environmental Opportunity under SEO1 it sets out ‘Safeguard inward and outward views and to the distinctive hill line and conserve and enhance the special qualities, tranquillity, sense of remoteness and naturalness of the area’.</p> <p>The National Planning Policy Framework (NPPF) under paragraph 172 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.</p> <p>Specific comments relating to the Pre-commencement Document (Reg18) Consultation are attached document entitled <i>Mendip Hills Area of Outstanding Natural Beauty (AONB) Comments – North Somerset Local Plan 2023-2038 Regulation 18 Consultation</i> for your consideration.</p> <p>Should you require any further information, please do not hesitate to contact the Mendip Hills AONB Unit.</p> <p>We would wish to participate in future consultations concerning the North Somerset Local Plan.</p> <p><b>Overarching Comments</b></p> <p><b><u>The Mendip Hills AONB and the ‘setting’ of the Mendip Hills AONB</u></b></p>	

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			<p>The nationally protected landscape of the Mendip Hills AONB covers 198 square kilometres from Bleadon in the west to Chewton Mendip in the east. The AONB partly lies within the North Somerset to the south-west of the wider Bristol area and south-east of Weston-Super-Mare. Areas of Outstanding Natural Beauty are some of the UK's most cherished and outstanding landscapes.</p> <p>The Countryside and Rights of Way (CROW) Act 2000 confirmed the significance of the 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 as Area of Outstanding Natural Beauty. Potential development proposals outside of the boundaries of AONBs that may have an impact within the designated area, are also covered by the 'duty of regard'.</p> <p>The concept of 'setting' is often used to describe the area of land within which activities or changes could affect the associated AONB. The Government's Planning Practice Guidance draws attention to the concept of 'setting' and the Section 85 duty to AONBs stating that: 'The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas.' (PPG, <i>Natural Environment (Landscape) section, paragraph reference ID 8-003-201 440306</i>).</p>	



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			<p><i>Development outside of an AONB is capable of affecting the AONB and as such, the potential for effects on the AONB special qualities and distinctive characteristics are a consideration.</i></p> <p><b>Page 4 paragraph 10 Pre-commencement Document - Environmental and historic conservation and enhancement</b></p> <p>The Mendip Hills Area of Outstanding Natural Beauty (AONB) Unit feel that the special designation of the Mendip Hills AONB should be celebrated and that the first reference to this protected landscape within all Local Plan documentation should be referenced fully. In addition, it is widely recognised that our landscapes and wildlife need to be helped to 'recover' alongside conserve and enhance. We request wording to be amended as follows;</p> <ul style="list-style-type: none"> <li>• <b><i>'Environmental and historic conservation and enhancement: Protection, recovery and enhancement of landscapes, wildlife and historic assets, strategic green infrastructure, Mendip Hills Area of Outstanding Natural Beauty (AONB) '</i></b></li> </ul> <p>The Mendip Hills AONB Unit wish to highlight that the duty of regard to 'conserve and enhance natural beauty within the Mendip Hills AONB and that this duty also applies to proposals outside of the boundaries of the AONB that may have an impact within the designated area.</p> <p>The DEFRA 25 Year Environment Plan sets out under paragraph 2.2.1 that 'Some of England's most beautiful landscapes and geodiversity are protected via a range of designations including National Parks and Area of Outstanding Natural Beauty (AONBs)...Over the next 25 years we want to make sure they are not only conserved but enhanced'. Paragraph 2.2.2 further sets out that 'In England, a quarter of our landscape is</p>	

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			<p>designated in this way, around 10% as National Parks and 15% as AONBs. We will make sure they continue to be conserved and enhanced, while recognising that they are living landscapes that support rural communities...'</p> <p>The Mendip Hills AONB Management Plan 2019-2024 was adopted by the joint local authorities in Spring 2019. The Management Plan sets out that 'The primary purpose of the AONB designation is to conserve and enhance natural beauty. In pursuing the primary purpose, account should be taken of the needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment. Recreation is not an objective of designation, but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.'</p> <p>The Management Plan under paragraph 1.4 sets out the Statement of Significance on the special qualities of the Mendip Hills AONB that create the Mendip Hills sense of place and identity.</p> <p>Planning Policy Guidance (PPG) sets out that;</p> <p>'Management plans for National Parks, the Broads and Areas of Outstanding Natural Beauty do not form part of the statutory development plan, but they help to set out the strategic context for development. They provide evidence of the value and special qualities of these areas, provide a basis for cross-organisational work to support the purposes of their designation and show how management activities contribute to their protection, enhancement and enjoyment. They may contain information which is relevant when preparing</p>	

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			<p>plan policies, or which is a material consideration when assessing planning applications. <i>(PPG, Natural Environment (Landscape) section Paragraph: 040 Reference ID: 8-040-20190721).</i></p> <p>Planning Policy Guidance (PPG) also sets out that ‘The National Planning Policy Framework makes clear that the scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty. Its policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas. Effective joint working between planning authorities covering designated and adjoining areas, through the preparation and maintenance of statements of common ground, is particularly important in helping to identify how housing and other needs can best be accommodated...’</p> <p><i>(PPG, Natural Environment (Landscape) section, Paragraph: 041 Reference ID: 8-041-20190721)</i></p> <p><b>Page 5 Paragraph 12 Pre-commencement Document: Evidence base</b></p> <p>Planning Policy Guidance (PPG) sets out that;</p> <p>‘Management plans for National Parks, the Broads and Areas of Outstanding Natural Beauty do not form part of the statutory development plan, but they help to set out the strategic context for development. They provide evidence of the value and special qualities of these areas, provide a basis for cross-organisational work to support the purposes of their designation and show how management activities contribute to their protection, enhancement and enjoyment. They may</p>	

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			<p>contain information which is relevant when preparing plan policies, or which is a material consideration when assessing planning applications.' (PPG, Natural Environment (Landscape) section Paragraph: 040 Reference ID: 8-040-20190721).</p> <p>Therefore, Mendip Hills AONB Unit wish that The Mendip Hills AONB Management Plan 2019-2024 should be considered as part of the evidence base in the preparation of the North Somerset Local Plan 2023-2038.</p> <p><b>Local Plan 2038 Sustainability Appraisal Scoping Report</b>  <b>Question 1. Have all relevant plans and programmes been referenced?</b></p> <p>The Mendip Hills AONB Partnership produce the AONB Management Plan every five years. The Mendip Hills AONB Management Plan 2019-2024 was adopted by the joint local authorities in Spring 2019.</p> <p>Mendip Hills AONB Unit consider that providing a link to the Management Plan 2019-2024 would be beneficial to cross referencing <a href="https://www.mendiphillsaonb.org.uk/caring-about-the-aonb/management-plan/">https://www.mendiphillsaonb.org.uk/caring-about-the-aonb/management-plan/</a></p> <p><u>Suggested amended text to be</u></p> <p>'...The significance of the landscape of the Mendip Hills is acknowledged by their designation as an Area of Outstanding Natural Beauty (AONB) (Map3) for which aa Management Plan id produced each five years, the current plan being The Mendip Hills AONB Management Plan 2019-2024 <a href="https://www.mendiphillsaonb.org.uk/caring-about-the-aonb/management-plan/">https://www.mendiphillsaonb.org.uk/caring-about-the-aonb/management-plan/</a>.'</p> <p><b>2. Is any significant environmental, social or economic data missing or misrepresented? Page 38 Green Infrastructure</b></p>	

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			<p>The Mendip Hills support opportunities to encourage healthy lifestyles – Green Infrastructure opportunities link into the wider strategic GI movement networks within the AONB would be supported, however impact on inherent sensitivities, special qualities and character of the landscapes will need to be carefully considered and addressed.</p> <p><b>3. Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan document?</b></p> <p>Mendip Hills AONB Unit wish to highlight considerations regarding forthcoming SHLAA for strategic allocations and transport schemes, highlighting that any considerations must have regards 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 the AONB that may have an impact within the designated area are also covered by the ‘duty of regard’.</p> <p>The wider implications of any transport schemes must be considered, with the cumulative impact on the wider road network. One of the issues impacting 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.</p> <p>A further consideration will be the impact of lighting on the protected landscape.</p>	
Mr P Bennett		Tetlow King (Jamie Roberts)	<p><b>RE: NORTH SOMERSET LOCAL PLAN: PRE-COMMENCEMENT CONSULTATION</b></p>	<p><a href="#">0213-06.M15 NS Pre-Commencement Rep.pdf</a></p>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>Thank you for the opportunity to comment on the Pre-Commencement Consultation for the emerging North Somerset Local Plan. These representations are prepared by Tetlow King Planning on behalf of Mr P Bennett who has development interests at land at Greenway Farm, Weston-super-Mare.</p> <p>The Pre-Commencement Consultation outlines the scope of the Local Plan and the evidence base work which the Council intends to undertake. We agree with the proposed scope of the Local Plan at paragraphs 9 and 10, which is proposed to include strategic policies as well as site allocations and development management policies. The production of a 'single Local Plan' will ensure that the Council has a full suite of policies which will enable it to address its persistent housing shortage and achieve a step-change in delivering new open market and affordable homes.</p> <p>In particular, site-specific allocations will help the Council to 'top up' its housing land supply in the early years of the Plan period and maintain a rolling five year supply in the medium and long term. Although several strategic sites in the adopted Development Plan are currently building-out, a wider range of sites will help to diversify the housing market and boost development in the immediate future. Not only will this boost housing supply but it will also offer a welcome economic gain through greater choice and diversity in the construction industry. This will support the construction sector and wider economic recovery after the current COVID-19 outbreak and ensure the housing land supply remains resilient<sup>1</sup>.</p> <p>This is in the context where the Council must plan for a substantial uplift in housing when compared with both the adopted Development Plan and the now-withdrawn draft Joint Strategic Plan (JSP). The Core Strategy requirement stands at 1,049 dwellings per annum, the JSP contemplated 1,250 dwellings per annum, and the emerging Local Plan will need to plan to meet its Local</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>Housing Need figure of some 1,359 dwellings per annum. This is a significant increase from the current housing requirement of 30% and will require the Council to plan for a significant number of new housing allocations to meet this requirement.</p> <p>The emerging Local Plan must therefore make balanced judgements when identifying the development strategy and when allocating sites. There is a range of competing priorities and development constraints in North Somerset which will pose challenges to plan preparation. It is therefore important that the evidence base is comprehensive, detailed and robust. The list of documents set out at paragraph 12 of the Pre-Commencement Document is a good starting point but it important that sites and emerging development proposals are assessed on an individual basis rather than on blanket ‘parcels’ which sometimes fail to accurately reflect the characteristics of individual sites. The list of evidence base documents should therefore also incorporate site-specific matters such as landscape and heritage. The Strategic Housing Land Availability Assessment will need to set out a robust methodology for the assessment of sites and development potential. A new call for sites should be undertaken at the earliest opportunity to help inform plan preparation. My clients are keen to be involved at an early stage to assist with identifying a range of suitable housing sites.</p> <p>Greenway Farm, Weston-super-Mare</p> <p>The Council will be aware that part of this site was previously promoted in various rounds of Local Plan production including calls for sites. However, my clients are now seeking to promote a wider parcel of land.</p> <p>The site as a whole measures some 24.8 hectares in area and a Site Location Plan is provided at <b>Appendix 1</b>. The site forms two distinct sub-areas:</p>	

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			<ul style="list-style-type: none"> <li>• <b>Area 1</b> measures some 3.3 hectares and encompasses the land immediately north of Lyefield Road, including the existing Greenways Farm buildings. It is adjoined to the east by the new extension to the Weston-super-Mare cemetery which was completed in 2019, and to the south by established residential development. The land is entirely within Flood Zone 1.</li> <li>• <b>Area 2</b> is larger, measuring some 21.7 hectares encompassing land further north and east between Collum Lane and Ebdon Road.</li> </ul> <p><b>Area 1</b> has previously been promoted through Development Plan preparation stages. Previous Call for Sites submissions have highlighted the absence of constraints to development at the site as well as the ability for the site to come forward promptly. The site was assessed by the Council in the 2018 Strategic Housing Land Availability Assessment and was found to have development potential (site reference HE1469 SH1274). The site has several key benefits, including:</p> <ul style="list-style-type: none"> <li>• Its location as a logical extension to the existing built form of Weston-super-Mare, adjoined by existing development to the south and with the newly-extended cemetery to the east;</li> <li>• Its ready access to local services including schools, local shops, public houses and public transport services, as well as its position on the edge of the largest town in the district;</li> <li>• Its position within Flood Zone 1, in contrast to many areas around Weston-super-Mare and Worle.</li> <li>• The scale of the site, of around 110 dwellings (based on an average 35 dwellings per annum) means that it can be delivered without requiring substantial up-front infrastructure and can come forward within the first five years of the Plan period.</li> </ul> <p><b>Area 2</b> is a longer-term proposition. Its greater size means that it can accommodate a significantly larger quantum of development, potentially of a range of uses such as residential, commercial and community uses. Further technical work will be undertaken</p>	



Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>at the appropriate stage in the Plan preparation process, to address matters such as masterplanning, drainage, access and landscape to demonstrate how the site will meet housing needs in the medium and longer term. There is space within the site for landscaping, public open space, sustainable drainage systems, to be explored further through detailed site masterplanning.</p> <p>Summary and conclusion</p> <p>The Pre-Commencement consultation is welcomed; the scope of the Plan and the evidence base work are largely appropriate. The Local Plan must balance competing objectives, priorities and constraints and it is therefore important that the evidence base is robust and detailed.</p> <p>The Council should give careful consideration to the role that site allocations can play in meeting the high housing need in North Somerset, addressing the persistent housing shortfall, and achieving the other core objectives of the Plan. Land at Greenways Farm is a suitable candidate for allocation; part of the site can come forward now to deliver much-needed new homes in the short term in a sustainable location, whilst the rest of the site offers potential in the medium to long term to meet a range of development needs. A new call for sites should be undertaken to inform the process.</p> <p>We look forward to engaging in the Local Plan process in a constructive way. As the Local Plan progresses and the Council's consideration evolves, further technical and design evidence will be</p> <p>supplied at the appropriate stage. We would welcome the opportunity to discuss the Plan and the site further; please get in touch on the details below. We would like to be notified of further consultations; please notify <b>Tetlow King Planning</b> by email only to <b>consultation@tetlow-king.co.uk</b>.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
Mr L Mackenzie		Tetlow King (James Stacey)	<p data-bbox="889 437 1659 496"><b>RE: NORTH SOMERSET LOCAL PLAN: PRE-COMMENCEMENT CONSULTATION</b></p> <p data-bbox="889 536 1783 699">Thank you for the opportunity to comment on the Pre-Commencement Consultation for the emerging North Somerset Local Plan. These representations are prepared by Tetlow King Planning on behalf of Mr L Mackenzie who has development interests at land at Backwell Common/land to the east of Backwell. I attach a plan of his current land interest.</p> <p data-bbox="889 738 1783 1002">We support the Pre-Commencement Consultation as it outlines the scope of the Local Plan and the evidence base work which the Council intends to undertake. Development at Backwell can play an important strategic role in North Somerset's growth ambitions, not least linked to the railway station, its proximity to Bristol and also specifically in respect of land at Backwell Common/land to the east of Backwell the ability to facilitate strategic road connections between Nailsea and the A370, thereby reducing congestion and air pollution at the busy Backwell traffic lights.</p> <p data-bbox="889 1042 1783 1305">We agree with the proposed scope of the Local Plan at paragraphs 9 and 10, which is proposed to include strategic policies as well as site allocations and development management policies. Backwell has the ability to contribute to the strategic growth options and deliver community benefits. For instance, road access (via the promoted land) could link with the council's own land at Backwell Leisure Centre where new enhanced and expanded facilities could be provided as part of the wider development. Thereby enhancing the community facilities in this location. The leisure centre also has a wide undeveloped road</p>	<a href="#">PJ76-01.M18 NS Pre-Commencement Rep.pdf</a>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>frontage and a good access road, which could be utilised to provide a suitable route to Nailsea, avoiding the traffic lights.</p> <p>The production of a 'single Local Plan' will ensure that the Council has a full suite of policies which will enable it to address its persistent housing shortage and achieve a step-change in delivering new open market and affordable homes. Backwell is a highly sustainable location and should be earmarked for a significant level of growth in the overall Plan housing distribution.</p> <p>In this regard, site-specific allocations will help the Council to not only 'top up' its housing land supply in the early years of the Plan period, but importantly help to maintain a rolling five year supply in the medium and longer term. Although several strategic sites in the adopted Development Plan are currently building-out, it is essential that a wider range of sites is identified to diversify the housing market and boost development in the immediate future. Not only will this boost housing supply but it will also offer a welcome economic gain through greater choice and diversity in the construction industry. This will support the construction sector and wider economic recovery after the current COVID-19 outbreak and ensure the housing land supply remains resilient<sup>1</sup>.</p> <p>North Somerset Council needs to act in an ambitious manner given that it must plan for a substantial uplift in housing numbers when compared with both the adopted Development Plan and the now-withdrawn draft Joint Strategic Plan (JSP). The Core Strategy requirement stands at 1,049 dwellings per annum, the JSP contemplated 1,250 dwellings per annum, and the emerging Local Plan will need to plan to meet its Local Housing Need figure of some 1,359 dwellings per annum. This is a significant increase from the current housing requirement of 30% and will require the Council to plan for a significant number of new housing allocations to meet this requirement.</p>	

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			<p>The emerging Local Plan must therefore make balanced judgements when identifying the development strategy and when allocating sites. There is a range of competing priorities and development constraints in North Somerset which will pose challenges to plan preparation. It is therefore important that the evidence base is comprehensive, detailed and robust. The list of documents set out at paragraph 12 of the Pre-Commencement Document is a good starting point but it important that sites and emerging development proposals are assessed on an individual basis rather than on blanket ‘parcels’ which sometimes fail to accurately reflect the characteristics of individual sites. The list of evidence base documents should therefore also incorporate site-specific matters such as landscape and heritage. The Strategic Housing Land Availability Assessment will need to set out a robust methodology for the assessment of sites and development potential. A new call for sites should be undertaken at the earliest opportunity to help inform plan preparation. My clients are keen to be involved at an early stage to assist with identifying a range of suitable housing sites.</p> <p><b>Backwell Common/land to the east of Backwell</b></p> <p>My client is seeking to promote a land to the east of Backwell/Backwell Common. This extends to 24.58 hectares in roughly 3 parcels. It is acknowledged that the site falls within the Green Belt. However, in light of strategic road ambitions as identified in the Joint Local Transport Plan 4 (JLTP4) and the need for additional housing it is firmly believed that exceptional circumstances exist for strategic release of the land from the Green Belt.</p> <p>The site forms three distinct sub-areas:</p> <ul style="list-style-type: none"> <li>• <b>Area 1</b> forms some 2.9 hectares of land between Waverley Road, Backwell Common and the railway. It is well-contained by built form</li> </ul>	

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			<p>and offers the opportunity to deliver a discrete, self-contained residential development within the early years of the Plan period, contributing to the Council's five-year housing land supply.</p> <ul style="list-style-type: none"> <li>• • <b>Area 2</b> forms some 15.7 hectares of land east of Backwell, adjacent to the premises of Backwell School and Backwell Leisure Centre. This offers the potential for strategic-scale residential development to come forward over a longer timeframe. There is also the potential to provide land to facilitate the expansion of the Leisure Centre and the school if required. Moreover, the site can facilitate delivery of the link road as envisaged in JLTP4. There is an existing access beneath the railway to the northern corner of the parcel which could be upgraded to support the link road.</li> <li>• • <b>Area 3</b> forms two separate parcels totalling 5.9 hectares of land north of the railway. This land could be used for a range of uses including residential, or alternatively as public open space, serving ecological or drainage purposes subject to detailed design work.</li> </ul> <p><b>Summary and conclusion</b></p> <p>The Pre-Commencement consultation is welcomed; the scope of the Plan and the evidence base work are largely appropriate. The Local Plan must balance competing objectives, priorities and constraints and it is therefore important that the evidence base is robust and detailed. Backwell has a key role to play in housing but also providing link roads to Nailsea. My client's land can facilitate access under the railway whilst not interrupting the existing minor road serving a few houses.</p> <p>The Council should give careful consideration to the role that site allocations can play in meeting the high housing need in North Somerset, addressing the</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>persistent housing shortfall, and achieving the other core objectives of the Plan. Land at Backwell Common and to the east of Backwell generally is a suitable candidate for allocation; part of the site can come forward now to deliver much-needed new homes in the short term in a sustainable location (area 1), whilst the rest of the site offers potential in the medium to long term to provide the access road, linkage under the railway, expansion and enhancement of the leisure centre (areas 2 and 3). A new call for sites should be undertaken to inform the process, where more detailed plans and report can be provided to facilitate plan making and site allocations.</p> <p>We look forward to engaging in the Local Plan process in a constructive way. As the Local Plan progresses and the Council's consideration evolves, further technical and design evidence will be supplied at the appropriate stage. We would welcome the opportunity to discuss the Plan and the site further; please get in touch on the details below. We would like to be notified of further consultations; please notify <b>Tetlow King Planning</b> by email only to <b>consultation@tetlow-king.co.uk</b>.</p>	
RS Hill and Sons Ltd		RPS	<p><b>Representations to North Somerset Local Plan 2023-2038 Pre-commencement Consultation March 2020 on behalf of RS Hill &amp; Sons, owners of Hillview Park Home Estate, Lulsgate, Bristol BS40 9XE</b></p> <p>On behalf of our client RS Hill &amp; Sons Ltd ('our client'), RPS has prepared the following representation to the North Somerset Local Plan 2023-2038 Pre-commencement Consultation March 2020.</p> <p><b>Background</b></p> <p>The West of England Joint Spatial Plan (JSP), a joint statutory development plan document covering the four authorities of Bristol, Bath and North East</p>	<p><a href="#">1134 R 20200422 NG Representations to North Somerset LP Scoping FV_Complete_reduced.pdf</a></p>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>Somerset and South Gloucestershire, was being prepared to cover the period from 2016-2036. It set out the strategic policies for the West of England area and was submitted for examination in April 2018.</p> <p>Following the first round of hearings which took place in July 2019, the Inspectors wrote to the four authorities stating that they did not consider the JSP to be sound, primarily due to concerns with the spatial strategy, they considered the issues they had identified as being too difficult to overcome through modifications of the plan and therefore recommended that withdrawal of the JSP was the most appropriate option.</p> <p><i>(Prior to the withdrawal of the JSP North Somerset Council had begun preparing a Local Plan in parallel with the JSP process. As such a Local Plan Issues and Options document, based on the strategic context set out in the JSP, was consulted on in September 2018.)</i></p> <p>As a result of the withdrawal, North Somerset Council ('the Council') is now looking to prepare a new Local Plan to include strategic and non-strategic policies whilst continuing to work with neighbouring planning authorities and other bodies under the duty to cooperate.</p> <p>The 'Pre-commencement Document' currently out for consultation sets out the scope for the new Local Plan. The scope identified includes:</p> <ul style="list-style-type: none"> <li>• <b>Housing Requirement:</b> The overall housing requirement to be accommodated in North Somerset using the standard method as the starting point <ul style="list-style-type: none"> <li>◦ <b>Addressing Climate Change:</b> Maximise sustainability, carbon reduction, renewable energy, focus on active travel and public transport, flood risk and coastal change, food production, greening.</li> </ul> </li> </ul>	

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			<ul style="list-style-type: none"> <li>◦ <b>Spatial Strategy:</b> The broad strategic distribution of housing and employment land/floorspace, including strategic locations and key sites.</li> <li>◦ <b>Infrastructure:</b> Identification of strategic infrastructure proposals, including transport.</li> <li>◦ <b>Green Belt:</b> Consider whether exceptional circumstances warrant a review of locations within the Green Belt.</li> <li>◦ <b>Employment:</b> Employment land will be provided to attract investment, meet business needs to support the future economy and provide a range of job opportunities at accessible locations. Consideration of the role of the port and airport and employment in town centres.</li> <li>◦ <b>Regeneration:</b> More effective and efficient use of land, conversions, new uses, housing estates and other areas.</li> <li>◦ <b>Town centres and high streets:</b> Working with partners to bring forward brownfield sites, re-use vacant buildings and shops, increase people living and working in town centres, investment in the public realm.</li> <li>◦ <b>Place-making, quality design and provision of community facilities:</b> Shaping attractive and healthy communities, green infrastructure, higher density at sustainable locations, raising design quality, creating character and identity, strategic gaps between or within settlements.</li> <li>◦ <b>Environmental and historic conservation and enhancement:</b> Protection and enhancement of landscapes, wildlife and historic assets, strategic green infrastructure, AONB.</li> <li>◦ <b>Minerals:</b> Aggregate apportionment and supply.</li> </ul> <p style="text-align: center;"><b>Representations</b></p>	



Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>RPS made representations on behalf of our client to the previous Local Plan and JSP consultations. RPS wish to take this opportunity to reiterate our client's concerns so they can be considered by the Council right at the start of the Plan making process. Copies of these representations are enclosed for the avoidance of doubt, and these include a number of background technical and other documents, which remain relevant and should be considered to be submitted with these representations.</p> <p>As identified above, the new Local Plan will consider high level strategic issues including the location of new development and the associated infrastructure required. Our client's concerns relate to a transport proposal which formed part of the previous strategy.</p> <p>Our client owns the residential Hillview Park Estate park home site located on the A38 Road, Lulsgate, Bristol and comprises of 24 owner-occupied park homes which are aimed at adults over 50 years.</p> <p>The JSP included a proposal for significant road improvements to be made along the A38 Corridor which (in the absence of any other information to the contrary), would have had the potential for a significantly detrimental effect on the Park if the 'improvements' included widening the road's existing alignment (as was potentially suggested). Our client's specific concerns in relation to this were as follows:</p> <ul style="list-style-type: none"> <li>◦ The existing A38 Corridor in the area is narrow and immediately abuts the existing Park Estate and other businesses and residents on both sides of the road. It is difficult to see how any enhancements (e.g. additional carriageways) can be facilitated within the existing highway boundaries, and this may only be achieved by increasing land</li> </ul>	

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			<p>take through land acquisitions or compulsory purchase. For the Hillview Park Estate, the only car park for residents sits immediately adjacent to the A38 and any widening project which removes this car park could adversely affect the parking situation at the Park as there are no other parking facilities available or land on which a new car park could be provided. Our client must therefore oppose any proposals which would require land along the A38.</p> <ul style="list-style-type: none"> <li>◦ Our client also had concerns that other strategic development would result in increased traffic along the A38 which may make it more difficult to access the Park via its existing access/egress onto the A38, and cause detriment to the standard of living of the residents, who are retired and which have decided to live at the park for tranquillity reasons among others.</li> </ul> <p>When commenting on the JSP previously, RPS made reference to the supporting Joint Transport Study (JTS) which indicated at Figure 5.1 that a new road was required from Bristol Airport to the South Bristol Link Road (noting that the alignment was illustrative at that stage) and Paragraph 5.2 that there were significant issues along the A38 (please refer to the various representations found in the enclosures to this letter), and that <i>“to meet the future needs of the Airport, it will be necessary to both improve road capacity on the A38 and transform the quality of public transport connections to the Airport”</i>. The new road reference did not appear to make it into the JSP itself.</p> <p>As improvements to the A38 are likely to be an issue for the new Local Plan (infrastructure needs), RPS requests at this early stage that the Council, when incorporating any improvements to the A38 in the</p>	

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			<p>emerging Plan, set out that it will seek to re-align the A38 ‘off- line’ through fields to the east of the existing A38 (as set out in the JTS), and not seek to widen the existing A38 itself. This is because it is unlikely to be possible without impacting on existing properties given the limited land available to facilitate any widening improvements.</p> <p>As regards to housing matters, RPS would also request that North Somerset District consider a policy which supports the development of residential mobile home parks/park home sites, primarily geared towards the elderly, which are a form of housing which is often overlooked, but provides housing for those looking to downsize to a low-cost, low-maintenance form of single- storey housing. In this regard, there is a specific demand for this within North Somerset District. As such, NPPF Paragraph 59 states: <i>“To support the government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, <b><u>that the needs of groups with specific housing requirements are addressed</u></b> and that land with permission is developed without unnecessary delay.”</i> Indeed, your neighbour to the south, South Somerset District Council, has incorporated such appropriate references in its Local Plan (adopted in 2015). We enclose an extract of their reference, which we would request North Somerset District consider as part of their Local Plan.</p> <p>Separately, we would be grateful if you would add our contact details to the consultation list database, so we can remain informed of future progress of the Local Plan and partake in future consultations.</p> <p>Please do not hesitate to contact us regarding any of our representations above. We look forward to working with the Council on the preparation of the new Local Plan.</p>	

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Persimmon Homes (James Durant)	Persimmon Homes		<p><b>INTRODUCTION</b></p> <p>These representations are submitted on behalf of Persimmon Homes Severn Valley (PHSV).</p> <p>PHSV are committed to providing the homes that people need within the North Somerset Council administrative area as well as within the greater west of England (WoE) region. Considering the number of homes we provide within the region, we are well placed to provide constructive input in to the process of the making of the emerging Local Plan.</p> <p>PHSV would be pleased to engage positively with the Council to discuss the practical implications of future development management policies within and outside of the formal emerging planning policy consultation process as well as providing advice and input in to the development of the overarching strategy.</p> <p>Before we turn to considering the scope of the issues which we believe should be covered in the emerging Local Plan and the detail surrounding the spatial strategy, it is important to set out the overall context that these comments should be read within.</p> <p><b>OVERARCHING CONTEXT</b></p> <p><i>West of England Joint Spatial Plan (JSP)</i></p> <p>PHSV share in the disappointment of the development sector, the local community and the four Councils regarding the government's assessment that there were very substantial soundness problems with the JSP and that it should be withdrawn, culminating in its eventual withdrawal.</p>	<p><a href="#">05-31 North Somerset Pre-commencement Consultation.pdf</a></p> <p><a href="#">Appendix 2 - Backwell Site Location Plan.pdf</a></p> <p><a href="#">Appendix 1 - East Portishead Vision Document.pdf</a></p>

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			<p>Whilst the JSP process has ended, it is critically important that we take the findings of its examination in to the development of future Plans within the region, learning lessons and ensuring that the Plans which will now come forward in the WoE region are not beset with the same issues when they are examined in future; as discussed further in this representation, a critical issue surrounding the need for housing in the region will only be further exacerbated without the timely adoption of a Plan which addresses that need.</p> <p>It is evident from the Inspectors' post hearing letters, as well as the verbal comments made during the examination that whilst there were a number of concerns with the JSP, the main concern they had which was insurmountable and was in essence the root cause of all other symptomatic issues they raised, was the lack of a coherent and robust spatial strategy upon which the Plan had been developed and against which all aspects of it could be assessed. Without such a baseline spatial strategy, it was not possible for instance to adequately assess the reasonable alternatives for the spatial strategy itself let alone the candidate strategic development locations (SDL) which weren't selected as per the legal requirement under the stipulations for sustainability appraisal. As pointed out by the Inspectors, fundamentally it was also not possible to reasonably assess the candidate SDL's on the basis that each candidate SDL would have to be assessed against every other candidate SDL, rather than assessing them in a grouped format against those others which sought to address an identified need within the underpinning spatial strategy. To illustrate the point (something which Inspector Malcolm Rivett did during the examination), if the spatial strategy had been based upon focussing the development needs to those areas which needed it most and or areas which were most sustainable, each candidate site would only need to be assessed against the other candidate sites in the area it was located e.g a need for five SDL's at Portishead would have meant that candidate SDL's around Portishead would only be assessed against those others around Portishead and not those located near Chipping</p>	

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			<p>Sodbury and Yate. This issue had direct implications for every other facet of the Plans examination and was inevitably its downfall.</p> <p>Inspector Malcolm Rivett gave further comments on this at the examination and having listened back to the recordings of the examination, those comments from the 9<sup>th</sup> July were as follows: (SEE ATTACHMENT FOR QUOTES)</p> <p>Later in this representation, when considering the scope of the emerging spatial strategy, we draw on some of the lessons we feel should be learnt from the examination and Inspectors' findings in relation to the JSP and how these should shape the emerging Plan.</p> <p><i>Employment</i></p> <p>Employment and housing needs are intrinsically linked, something which is widely recognised and is indeed recognised within the National Planning Policy Framework (NPPF). As discussed later in this representation, the NPPF requires that in assessing housing needs, the employment context is considered in order to understand whether any uplifts to the housing requirement are required.</p> <p>The WoE Councils' employment topic paper of November 2017 which formed part of the evidence base for the JSP recognised that "<i>the WoE is a prosperous city region with growth that has exceeded the national average over the past 15 years. Productivity is the highest of all the core cities and the WoE is a net contributor to the UK economy. The GDP per head for this area is higher than Bordeaux and Barcelona and similar to Hannover</i>".</p>	

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			<p>The topic paper went on to state:</p> <p>"At the heart of this success lie some of the region's core strengths:</p> <p><i>-connections to the rest of the UK and the world through motorway, rail, air and sea links help businesses to compete nationally and internationally;</i></p> <p><i>-a highly skilled, talented workforce, many of whom are educated at our world class universities or are attracted by the high-quality jobs on offer. The strong, vibrant and diverse cultural and leisure opportunities coupled with an outstanding natural environment, encourages them to stay;</i></p> <p><i>-home to clusters of world leading sectors e.g. aerospace, financial and professional services, creative and digital, and emerging sectors such as robotics, artificial intelligence (AI), driverless cars and assisted living supported by Smart Cities and Smart Housing.</i></p> <p><i>-Well defined functional economic market area (FEMA) focused around the 3 primary centres of Bristol, Bath and Weston-super-Mare."</i></p> <p>The Planning Practice Guidance (PPG) advises that where appropriate, past economic growth trends should form part of the testing process for assessing the likely future jobs forecast for an area<sup>2</sup>. Data is published annually by the Office for National Statistics (ONS) derived from labour market statistics, which estimate the growth in jobs for each local authority in England. Whilst the Council will now be working on a Local Plan, independent from the other three local authorities, as was demonstrated through the JSP process and as is required through the duty</p>	

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			<p>to co-operate, it is important to consider the context of the wider region considering that both the housing market area and functional economic market area North Somerset sits within spreads wider than its administrative boundaries. It is also evident that Bristol's needs will unlikely be met in total within its own administrative boundaries.</p> <p><b>Table 1: Job Growth in the WoE Region and in Great Britain 2000 - 2018 - SEE ATTACHMENT</b></p> <p>As is demonstrated in Table 1, there has been a 28% increase in jobs within North Somerset over the period 2000 to 2018, far higher than the 20% seen on average across Great Britain as a whole. This illustrates the point made within the four authorities' employment topic paper that the employment picture within the region and particularly within North Somerset is very strong and this trend analysis alone would suggest that the job yield over the coming years and the emerging Plan period is likely to be far higher than the national average. As shown in Table 2, extrapolating the 2018 figures up to 2038 (the end of the proposed Plan period) based on the past annual growth rate in Table 1 would predict that job growth based on past trends since 2000 would result in an increase of over 66,000 jobs in North Somerset or an increase of 65%, far in excess of the 21% increase potentially seen nationally.</p> <p><b>Table 2: Predicted Job Growth in the WoE Region and in Great Britain 2018-2038 based on past trends - SEE ATTACHMENT</b></p> <p>The employment topic paper underpinning the four authorities approach to employment within the JSP process analysed three employment forecasts which included reports by Cambridge Economics, Experian and by Oxford Economics. Despite Cambridge Economics and Experian's reports suggesting that for the WoE region there would be higher than 100,000 job growth, the</p>	



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			<p>Council decided to use the 2015 Oxford Economics report as its evidence for guiding it's planned for job growth across the Plan period, settling on 82,500 jobs. Considering the age of the report and all other evidence including the past trends summarised above which suggest that the economic growth of the WoE region is likely to be higher than the national average and had even performed strongly in spite of the 2008 economic downturn, it is not considered that using the lowest of the evidential forecasts in the form of the Oxford Economics report was or is appropriate.</p> <p>The economic success of the west of England region is likely to strengthen over the coming years and decades and this will in turn yield far higher job growth. Such examples of this include the creation of the Western Gateway which is a strategic partnership recognised by the government and which seeks to promote and maximise economic growth across south Wales and the WoE to create jobs, boost prosperity and support the renowned universities and businesses of the region.</p> <p>The proposed partnership will seek to link a number of towns and cities across a wide region either side of the Severn and the Western Gateway will seek to mirror the successful, established work of the Northern Powerhouse and Midlands Engine and will seek to ensure that the region is globally competitive. In a press release in November 2019<sup>4</sup> Secretary of State for Communities and Local Government Robert Jenrick MP stated:</p> <p><i>"The Western Gateway will draw on the diverse talents of both sides of the Severn to deliver an economic powerhouse that will drive growth throughout the region. Already a major centre for cyber and tech, research, manufacturing and the creative industries - there's clearly huge</i></p>	

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			<p><i>potential for them to achieve even greater things together. As this Government works to level up our regional economies, this initiative will give south west England and south Wales a powerful voice, just as the Northern Powerhouse and Midlands Engine have done for those areas."</i></p> <p>Chancellor of the Exchequer at the time, Sajid Javid went on to state:</p> <p><i>"Today we are announcing an exciting partnership to turbo charge growth across Wales and the south west of England. The Western Gateway is full of bustling towns and cities and boasts a rich cultural and industrial history – from the famous cheeses of Cheddar Gorge and iconic Roman Baths of Bath, to the thriving TV industry of Cardiff Bay. We won't rest until we have unlocked the potential this region has to offer as we level-up opportunities across the UK"</i></p> <p>The Western Gateway partnership, together with the setting up and aims of the WoE combined authority as a conduit for facilitating the growth in the region's economy would suggest that any forecast evidence which the Council use to base their Local Plan on should be seeking to plan for and facilitate a high level of job growth and not air on the cautious side as was the case under the JSP.</p> <p><b>Affordable Housing Need</b></p> <p>There is a widely recognised housing crisis and this has led to the escalation of house prices and the acute need for a greater volume of affordable housing. The degree of the issue of affordability in an area is especially relevant under the NPPF and guidance of the PPG which set out a standard method for calculating the base line need for housing in an area, a base line which should then be subject to an uplift where issues around affordability and likely employment growth necessitate it. It is important therefore to understand in detail the</p>	

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			<p>affordability context within the North Somerset Council administrative area in order to ensure that the emerging Plan caters for the areas needs and seeks to address them over the lifetime of the Plan.</p> <p>North Somerset Council have published four Strategic Housing Market Assessments (SHMA) over the course of the past decade, each of which demonstrates a severe lack of affordable housing delivery in the administrative area. The latest SHMA published in 2018 which looks at the housing needs of the North Somerset area, as well as the wider WoE region, is the <i>Wider Bristol HMA Strategic Housing Market Assessment Update Volume 1</i> (2018 SHMA). As supporting evidence for the JSP, the assessment found a need for 26,900 affordable dwellings across the proposed lifetime for the JSP from 2016 to 2036, equivalent to an annual need for 1,345 net affordable homes per annum; this was a decrease of 110 net affordable homes per annum from the previous figure published in the 2015 SHMA. The figure is then broken down to a need for 232 affordable homes per annum for North Somerset.</p> <p>The reduction appears to be a result of a change to the methodology for calculating affordable housing need, based on an assumption that many households seeking an affordable home will have secured housing in the private rented sector (PRS) which housing benefit has enabled them to afford, and as such will not necessarily need affordable housing, this is despite the assessment accepting at paragraph 3.101 that the PRS does not meet the definitions of affordable housing and that if housing benefit support were no longer provided then this would increase the need for affordable housing.</p> <p>A court judgment in 2015<sup>5</sup> highlighted that the PRS, whether subsidised by Local Housing Allowance or not, is not defined as affordable housing</p>	

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			<p>within the NPPF and as such should not be considered in the calculation of the full objectively assessed affordable housing need:</p> <p>"private rental accommodation is not affordable housing; and the Inspector was entitled to ignore the fact that state-subsidised accommodation in the private rented sector might in practice keep people who would otherwise be accommodated in affordable housing off the streets"</p> <p>This has also been challenged at Local Plan examinations, as seen in the Eastleigh Borough Local Plan Examination Inspector's Preliminary Conclusions on Housing Needs and Supply and Economic Growth dated November 2014, in which Mr Emerson stated: (SEE ATTACHMENT FOR QUOTES)</p> <p>It is important therefore that whilst the Council will now be subject to assessing its housing need through the government's standard method (discussed further below), a new up to date assessment of the full objectively assessed affordable housing need should be conducted and this should not account for any need being met through the PRS.</p> <p>Even if we were to accept that there is a need for 232 affordable homes per annum in the North Somerset administrative area up to 2036, it should be borne in mind that on average between 2006 and 2016, the Council only achieved on average 160 affordable housing completions per annum<sup>6</sup>. This does not take into account the losses of affordable housing stock through Right to Buy so the actual net additions of affordable homes over the period when taking account of the losses, is likely to be far lower. This clearly demonstrates that there is a significant affordability issue within North Somerset, one which should be addressed through a Local Plan which seeks to maximise the delivery of</p>	

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			<p>affordable housing across the Plan period through such ways as increasing the overall housing target to ensure that a greater amount of affordable housing is delivered in a way in which schemes are still viable.</p> <p><b>Affordability</b></p> <p>The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability in the context of Plan making and this is also important in the use of the standard method in calculating housing need.</p> <p>One indicator of affordability in an area is the housing register. As at 1<sup>st</sup> April 2019 there were 3,417 households on North Somerset Council’s housing register who require an affordable home and had been accepted as qualifying for affordable housing by the Council. If the Council’s average gross affordable housing delivery rate of 160 affordable completions per annum achieved over the period 2000-2016 were to continue, based upon 3,417 households on the housing register, it would take more than 21 years to house all those currently on the Housing Register. This somewhat unrealistically assumes that there would be no affordable homes lost in that period (through Right to Buy or demolitions) and that there would be no increase in households on the Housing Register during this period. In reality this would be highly unlikely, which merely serves to illustrate the challenge that the Council is facing.</p> <p>Median house prices within North Somerset are also higher than the median house prices at both the South West and national level. As demonstrated in</p>	

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			<p>Table 3 below the median house price in North Somerset in September 2019 was £258,000, 8% higher than the national median house price of £240,000. It is also evident from the statistics that since 2012 when the market had strengthened to being close to pre-recession levels, median house prices in North Somerset have increased by 41%, far higher than the same for the South West (35%) and England (32%).</p> <p><b>Table 3: Median House Prices - SEE ATTACHMENT</b></p> <p>Another recognised indicator of affordability is the ratio of house prices to incomes. As shown in Table 4 below, the median house price to median income ratio is 9.76, far higher than the 8.79 median seen at the South West level and the 7.83 seen nationally. The lower quartile ratio gives a greater understanding of the ability of those on the lowest incomes to afford to buy a home and this demonstrates that house prices are more than 9 times the average income of the lowest earners in North Somerset.</p> <p><b>Table 4: Ratio of House Prices to Incomes - SEE ATTACHMENT</b></p> <p>The evidence demonstrates that there is an affordability crisis within North Somerset which needs proactive planning to address through the creation of a Local Plan which significantly boosts the supply of housing.</p> <p><b>Overall Housing Need</b></p> <p>At the heart of the NPPF and indeed the national agenda, is the requirement for local planning authorities to significantly boost the supply of housing, both market and affordable housing. To this end, the government have set a target of delivering a minimum of 300,000 homes per year.</p>	

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			<p>The delivery of new housing contributes to the social and economic roles of sustainable development and it delivers major benefits in line with national and local policy.</p> <p>The government have created a standardised method for calculating housing need and the emerging Local Plan will now have to assess its housing need and define its housing target based on the government's standard methodology as a baseline.</p> <p>The PPG sets out that "<i>the standard method uses a formula to identify the <b>minimum</b> number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. The standard method set out below identifies <b>a minimum</b> annual housing need figure. <b>It does not produce a housing requirement figure</b>" (our emphasis).</i></p> <p>The PPG goes on to set out the way the minimum housing need should be assessed, set out in three steps, these are as follows:</p> <ol style="list-style-type: none"> <li>1. <b>Set the baseline</b> - Set the baseline using national household growth projections (2014-based household projections in England, table 406 unitary authorities and districts in England) for the area of the local authority.</li> <li>2. <b>Make an adjustment to take account of affordability</b> - adjust the average annual projected household growth figure (as calculated in step 1) based on the affordability of the area. The most recent median workplace-based affordability ratios, published by the Office for National Statistics at a local authority level, should be used.</li> </ol>	

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			<p>3. <b>Set a cap</b> – A cap is then applied which limits the increases an individual local authority can face. Where these policies were adopted within the last 5 years (at the point of making the calculation), the minimum local housing need figure is capped at 40% above the average annual housing requirement figure set out in the existing policies.</p> <p>However, the PPG<sup>8</sup> goes on to state the following regarding any use of a cap:</p> <p>"The standard method may identify a <b>minimum</b> local housing need figure that is significantly higher than the number of homes currently being planned for. The cap is applied to help ensure that the minimum local housing need figure calculated using the standard method is as deliverable as possible.</p> <p>The cap reduces the minimum number generated by the standard method, but does not reduce housing need itself. Therefore strategic policies adopted with a cap applied may require an early review and updating to ensure that any housing need above the capped level is planned for as soon as is reasonably possible.</p> <p><i>Where the minimum annual local housing need figure is subject to a cap, consideration can still be given to whether a higher level of need could realistically be delivered. This may help prevent authorities from having to undertake an early review of the relevant policies.</i>" (our emphasis)</p> <p>In calculating the minimum housing need within North Somerset using the standard method, it is important to assess this in the context of the need which is also derived from the calculation for the other authorities within the region</p>	



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			<p>which the JSP recognised share a housing market area and which are intrinsically linked.</p> <p>Using the standard methodology, the minimum housing need across the proposed Plan period of 2023 – 2038 is calculated as shown in Table 5 below.</p> <p><b>Table 5: Standard Methodology Calculation of Minimum Housing Need - Total - 2023 - 2038 - Uncapped and Capped - SEE ATTACHMENT</b></p> <p>The calculation set out in Table 5, demonstrates that for North Somerset the full uncapped minimum housing need over the proposed Plan period 2023 – 2038 is 44,310 whilst the figure capped at 40% is 19,600, illustrated more clearly through Table 6.</p> <p><b>Table 6: Total Minimum Housing Needs - Uncapped and Capped - SEE ATTACHMENT</b></p> <p>Table 7 below breaks the totals down in to an annual need across the period 2023 – 2038, demonstrating that for North Somerset there is an annual uncapped minimum need for 2,954 homes per annum, whilst the figure capped at 40% demonstrates a minimum need for 1,307 homes per annum.</p> <p><b>Table 7: Annual Minimum Housing Needs - Uncapped and Capped - SEE ATTACHMENT</b></p> <p>The PPG further notes, that:</p> <p>"The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. <b>The standard method for assessing local housing need provides a minimum</b></p>	

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			<p><b>starting point in determining the number of homes needed in an area.</b> It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, <b>there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.</b></p> <p>This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:</p> <ul style="list-style-type: none"> <li><i>-growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);</i></li> <li><i>-strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or</i></li> <li><i>-an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;</i></li> </ul> <p><i>There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether</i></p>	

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			<p data-bbox="891 320 1727 384"><i>it is appropriate to plan for a higher level of need than the standard model suggests." (our emphasis)</i></p> <p data-bbox="891 427 1783 1198">It is evident from Tables 5, 6 and 7 that if each of the four authorities were to bring forward Plans which sought to only accommodate the minimum capped figure for their areas based on the standard methodology, this would only accommodate 89,600 homes against a minimum objectively assessed need for 192,560 homes across the period 2023 – 2038, a potential shortfall against needs of 102,960 homes. As mentioned above, the PPG is clear that "<i>the cap reduces the minimum number generated by the standard method, but does not reduce housing need itself</i>". In light of the positive picture regarding economic growth summarised above as well as the affordability crisis within the region and particularly within North Somerset, it would be wholly inappropriate for the Council to pursue a Local Plan which only seeks to deliver the capped minimum figure of 19,600 homes across the Plan period. To do so would seriously undermine the ability for the predicted economic growth to take place and would further exacerbate a crippling affordability crisis within the region and would not make any headway in addressing the acute affordable housing needs. Such an approach would also be at odds with the guidance on the use of the standard methodology and would fly in the face of the principle within the NPPF to significantly boost the supply of housing with a view to achieving the 300,000 home target per year.</p> <p data-bbox="891 1241 1783 1305">The Council should ensure that a full review of all candidate sites is undertaken to ensure that all those which can demonstrate that they can be developed</p>	

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			<p>without any adverse impacts of doing so significantly and demonstrably outweighing the benefits, are allocated.</p> <p>Whilst the PPG recognises that the capped figure may be appropriate in circumstances where such a Plan identifies that it will need an almost immediate review, it should be borne in mind that North Somerset's adopted Plan was adopted a significant period of time ago, on the same premise that it would need to be reviewed shortly thereafter as the Inspector had concerns that it was not addressing the full objectively assessed need for housing. Taking such an approach again in relation to this emerging Plan and in the face of the Council's lack of a 5 year housing land supply and failures under the Housing Delivery Test would be inappropriate.</p> <p>The Council will also need to give due regard to the needs of Bristol City Council under the duty to so-operate. Bristol City Council has restricted geographic boundaries and with such high minimum needs demonstrated in tables 5, 6 and 7, it is highly unlikely that they will be able to address these needs on their own. This is especially the case when considering the make up of the needs which will require a large amount of family homes, not the flats which are associated with higher density urban living approaches to delivering housing as proposed under the JSP. North Somerset, as recognised by the Council, is intrinsically linked with Bristol with large numbers of out commuting from the area to Bristol for work and leisure; as such North Somerset will has an important role to play in accommodating a large proportion of Bristol's unmet needs and this should be informed by close discussions between the four local authorities.</p> <p><b>PHSV COMMENTS ON THE SCOPE OF THE EMERGING LOCAL PLAN</b></p> <p><i>Spatial Strategy</i></p>	

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			<p>At the top of this representation we summarised the lessons learnt from the JSP process and it is worth re-iterating the comments made by Inspector Malcolm Rivett during the examination: (SEE ATTACHMENT FOR QUOTES)</p> <p>The post hearing letter from the Inspectors’ also set out: (SEE ATTACHMENT FOR QUOTES)</p> <p>When taken together and in the context of all other comments in the post hearing letters and the examination itself, it is evident that the Council should seek to create a spatial strategy based on directing development which will meet identified needs, towards the most sustainable locations within the administrative area. Indeed, this is of course something which the adopted Local Plan for North Somerset already does and which was of course found to be a sound approach at that Plans examination. The Plan identifies the most sustainable locations based on a sustainable settlement hierarchy and this forms the strategy, as detailed in Table 8.</p> <p><b>Table 8: Core Strategy Spatial Distribution - SEE ATTACHMENT</b></p> <p>The above hierarchy should be used to proportion the housing target to these settlements with the proportion reducing as you move down the hierarchy.</p> <p>The JSP did not seek to direct any housing to Portishead through the SDL’s which were proposed and being that the adopted Core Strategy and the JSP noted the lack of brownfield opportunities in the town, this would have led to there being no further housing development across the JSP’s proposed Plan period due to the fact that any development would have had to have been within the Green Belt outside of the settlement limits and the JSP did not allow for such Green Belt releases to be enacted through subsequent Local Plans.</p>	

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			<p>Portishead is due to have its own train station and rail link to Bristol open in the coming years, something which will be of great benefit to the town and make it an even more desirable place to live than it currently is; it is not only therefore becoming an increasingly sustainable place to live but there will also be an increasing need for housing within the town over the coming years and decades. The town probably also has greater links to Bristol in terms of the commuting and leisure patterns than any of the other hier tier towns in the North Somerset hierarchy, something which will of course be further emphasised by the opening of the rail link. It is also evident that as of 1<sup>st</sup> April 2019, there were 759 households on the Council's housing register who had been accepted by the Council as being in need of affordable housing and who had stipulated a desire to live within Portishead; if the Council were to adopt a policy which sought 30% affordable homes from schemes, in order to address this affordable housing need within Portishead the Council would need to allocate at least 2,530 homes to the town just in order to meet this existing affordable housing need. Based on the sustainable nature of the town which will soon be greatly improved yet further by the opening of the railway link as well as its close relationship with Bristol which will have an unmet need for housing, we consider that Portishead should be taking a proportion of the housing target relative to this context.</p> <p><i>Site Allocations</i></p> <p>In light of the housing needs, the Council's lack of a 5 year housing land supply, the persistent failure under the Housing Delivery Test and the impact of the failure of the JSP on the ability for housing to be brought forward in the region, it is imperative that the Local Plan seeks to allocate housing and does</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>not leave this to a later document. It is also evident that the greatest quantity of affordable housing tends to come from allocated sites which have been viability tested and provide certainty to the developer and the industry that they will come forward. In light of the affordable housing need within the area, it should be a priority of the Council to maximise the amount of sites allocated, reducing the reliance on windfall sites and non strategic growth.</p> <p>As well as the sites which PHSV are developing within the North Somerset Council administrative area, we also control a number of other sites which are deliverable, developable and can be brought forward quickly in order to help address the current shortfall as well as the future needs of the Local Plan. The two main ones we believe should now be considered in greater depth by the Council with a view to allocating them for development are our interests at Portishead and at Backwell.</p> <p>Portishead</p> <p>As discussed earlier in this representation, Portishead is a highly sustainable location as recognised within the adopted Core Strategy. This sustainability is to be increased yet further in the coming years by the opening of a railway link to Bristol and on to the wider network. PHSV have a land interest to the east of the town (see promotional document at <b>Appendix 1</b> for location details). It is evident from the thought process summarised earlier in this representation that as part of a strategy which underpins the emerging Plan, it would be perverse and not sound for the Plan to not allocate any proportion of the future housing target to Portishead on the basis of the fact that the town sits high in the sustainable settlement hierarchy, will be becoming even more sustainable through the new rail link, has a close relationship with Bristol and has an</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>acute identified affordable housing need; all this in the context of the Council announcing a climate emergency which will require a focus on sustainability.</p> <p>Portishead is surrounded by Green Belt and it is considered that on the basis of the overall housing need, the affordable housing need, the sustainability of Portishead and its interconnectivity with Bristol, there are exceptional circumstances to merit Green Belt release at the town.</p> <p>The site PHSV control is within the Environment Agency defined Flood Zone 3, protected by flood defence, within which development such as residential development would need to pass the sequential test and exceptions test in order to be acceptable. PHSV have carried out our own sequential search of the town which seeks to assess all sites capable of accommodating the significant levels of housing required to meet the affordable housing needs of the town as well as mixed uses such as including employment; this demonstrates that due to the sustainable nature (close to the proposed train station, shops, services and facilities), the site is the most sequentially preferable location for housing at Portishead. Work has also been carried out at a high level which demonstrates that the exception test can be passed, ensuring that the development can be designed so as to protect the future residents as well as not increasing flood risk elsewhere. The Council should be undertaking its own strategic flood risk assessment to inform the emerging Local Plan and which seeks to address the needs at Portishead; we would be happy to provide any information which may be of use in relation to such a piece of work.</p> <p>Backwell</p> <p>Backwell is a sustainable location for growth, this was evidently also the belief of the Council as one of the SDL's proposed under the JSP was at Backwell.</p>	



Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>PHSV control land within the settlement which is highlighted at <b>Appendix 2</b> and which has previously been subject to an application and appeal which was ultimately dismissed by the Secretary of State (SoS) in 2018. Whilst decision did not find that the site was fettered with any technical reasons for refusal, the decision found that the neighbourhood plan for the area being less than 2 years old at the time led to the Council only needing to demonstrate a 3 years supply of housing land rather than 5, which the SoS believed could be demonstrated at that time.</p> <p>With Backwell established as a sustainable settlement and with the site outside of the Green Belt and close to the heart of the settlement, surrounded on all sides by existing development with no boundaries abutting open countryside, we consider that the site (whether in full or in part) should now be allocated for housing. In light of the acute housing need and affordability crisis summarised above, the Council should be seeking to allocate sites such as this which can clearly come forward with very little in the way of demonstrable harm but with much in the way of benefits, not least being the provision of housing and affordable housing. As at 1<sup>st</sup> April 2019, there were 494 households on the Council's housing register who were accepted as being in need of affordable housing and who stipulated a desire for a home in Backwell; at 30% affordable housing the Council would need to deliver more than 1,600 homes in Backwell just in order to meet this need let alone the future arising needs. Sites such as ours at Backwell should be allocated and brought forward as soon as possible.</p> <p>These comments are intended to be constructive and PHSV would be pleased to enter into further discussions on these comments as well as the practical</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			implications of future draft policies both within and outside of the formal consultation process. We would appreciate being kept informed of any future consultations on the emerging Plan.	
Summerfield Developments Ltd	Summerfield Developments Ltd	catherine@collierplanning.co.uk	<p><b>North Somerset Local Plan 2023 – 2038 Pre-Commencement Document Consultation</b></p> <p>We are writing on behalf of Summerfield Developments Ltd who control the land at Well Close, Winscombe as shown on the attached plan. Summerfield welcome the opportunity to comment on the emerging North Somerset Local Plan 2023-2038 as it progresses.</p> <p>The land at Well Close, Winscombe is located adjacent to the existing settlement boundary of Winscombe, to the south of Winscombe Woodborough Primary School. The site is adjoined by residential development to the south and west and by the school to the north. The northern part of the site is relatively flat and this part of the site would be particularly suitable for development. The steeper topography of the southern part of the site serves as a natural screening of any views into the northern part from the surrounding countryside meaning that any development of the northern part of the site would not be harmful to the AONB, particularly given its relationship in close proximity to existing development. The southern part of the site could form public open space. Vehicular and pedestrian access can be directly provided from Well Close.</p>	<a href="#">Land at Well Close Winscombe.jpg</a>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>The site is suitable and available for residential development (including affordable housing) and we request that the Council considers it at this early stage of the plan making process as a site suitable to be identified as an allocation in the Local Plan for residential development.</p> <p>If you require any further information at this stage, please do not hesitate to contact me.</p>	
Historic England (R Torkildsen)	Historic England		<p>To avoid repetition it appears our previous response from 2018 still applies and is germane to this stage too.</p> <p>North Somerset Local Plan 2036 – Generating Ideas Consultation (dated 10 January 2018)</p> <p>Thank you for providing Historic England with an opportunity to comment on the suggested allocations to accommodate major future development. As the Government’s adviser for the historic environment Historic England is keen to advocate to ensure the significance of North Somerset’s cultural heritage is sustained and opportunities for its enhancement are fully considered as part of a clear and positive strategy.</p> <p>Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. NPPF paragraph 126</p>	<p><a href="#">NS LP Generating ideas Jan 2018 HE.pdf</a>  <a href="#">NS LP SA Scoping April 2020.doc</a></p>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>At this early stage it may be opportune to emphasise that a positive strategy in the terms of NPPF paragraphs 9 and 126 is not a passive exercise but will require a plan for the maintenance and use of heritage assets and for the delivery of development, including within their setting, which will afford appropriate protection for those assets and make a positive contribution to local character and distinctiveness.</p> <p>Historic England believes that it is clear from the NPPF that the Government is expecting local planning authorities, through their Local Plans, to actively deliver the conservation and enhancement of the historic environment. The Government’s use of the words and phrases “seeking positive improvements”, “positive strategy”, “deliver the conservation and enhancement” and “a clear strategy for enhancing” all demonstrate that it is not sufficient for local planning authorities to be merely reactive in the conservation and enhancement of their historic environment.</p> <p>In response to this it may be helpful if you were to prepare a Heritage Topic Paper setting out the issues, opportunities, risks and challenges facing North Somerset’s historic environment and how the Local Plan, associated guidance, management plans, initiatives etc, might address these matters and fulfil national policy obligations.</p> <p><b>Identifying suitable locations for the delivery of sustainable development</b></p> <p>The planning system in England is based on the principle of sustainable development and heritage plays an increasingly important role in stimulating regeneration and informing sustainable growth, securing positive change that helps safeguard our historic places and heritage assets. Historic England will continue to respond constructively to the positive opportunities provided by new development suggested in the emerging Plan.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>You will need to demonstrate that an appropriate response to the historic environment is provided in accordance with the statutory and national policy tests<sup>1</sup>, and that evidence has been gathered and applied in accordance with NPPF paragraph 169 and how a positive strategy for the conservation and enjoyment of the historic environment is to be achieved and delivered, including those heritage assets most at risk through neglect, decay or other threats; in doing so recognising that heritage assets are an irreplaceable resource and need to be conserved in a manner appropriate to their significance.</p> <p>We note the suggested spatial strategy and infrastructure required to accommodate future growth and appreciate that a consideration of the significance of North Somerset’s historic environment is, and will continue to be an important factor noting the legislative and policy context.</p> <p>The following comments relate to the individual suggested allocations.</p> <p>Backwell - The Strategic Development Location Template acknowledges the further work required to appreciate the relative impact on the character and appearance of the adjacent Conservation Area and how, in turn, the local authority can demonstrate how the emerging Plan has applied great weight to safeguarding its significance. This evidence needs to be provided before the principle of the allocation is determined. We refer to the evidence gathered (a useful benchmark) to appreciate the impact of the Whitchurch (B&amp;NES) urban extension on the setting of surrounding heritage assets including the Queen Charlton Conservation Area. A similar exercise should be undertaken for this proposed allocation at this stage. Historic England notes an intention to provide a number of new roads including for example a new link road between the A370 and Nailsea. Further work will of course be required at this plan making stage to clarify the route, form and scale of the proposal to help appreciate the impact on</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>the historic landscape and the setting of heritage assets likely to be affected. We note the proximity at the eastern end of a potential road to the Tynesfield estate (National Trust). We would also emphasise the potential impact on significant heritage assets of a new M5 junction to serve a new road from Nailsea. You will appreciate the statutory and national policy tests that need to be applied at this stage.</p> <p>Banwell Garden Village - Historic England welcomes the opportunity provided by the proposed bypass to enhance the historic core of Banwell. However due to the suggested route, expertise will need to be employed to ensure archaeology preserved within the Levels is assessed and conserved where of particular importance. Minimising any potential adverse impact on the setting and experience of the setting of Banwell Camp (a former large Iron Age hillfort), and other heritage assets within the vicinity (E.g. Banwell Romano British Villa, and Banwell Bones Caves) will be another important factor to be addressed at this plan making stage.</p> <p>Churchill Garden Village - It is apparent from the commentary in the consultation literature and supporting Strategic Development Location Template that the importance and sensitivity of the historic environment is acknowledged. However the evidence applied to inform these conclusions does not appear to be available and as a consequence cannot be considered. This clearly needs to be addressed at this stage to inform the soundness of the Plan and we draw attention to the benchmark provided by heritage evidence gathered and made available to inform the Whitchurch (B&amp;NES) urban extension.</p> <p>Nailsea - Greater clarity is required to demonstrate the evidence that has been gathered and applied to inform the impact of this sizeable urban extension on the setting of numerous highly graded heritage assets and the wider historic landscape as a whole. This raised land above the wetlands to the west will be of considerable archaeological interest. It will be particularly important for you to</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>address NPPF paragraph 170 and the need to prepare historic landscape sensitivity assessments to inform major expansion options. The historic landscape between the M5 and Bristol is distinctive and it is unclear how an understanding of landscape sensitivity has informed the principle and extent of the proposed allocations.</p> <p>For all these potential sites, evidence need to be gathered to establish the key positive landscape features and the landscape character areas sensitive to change.</p> <p>I sincerely hope that our advice can help ensure growth complements North Somerset's historic landscape character and renowned heritage assets. We look forward to working constructively with you on this important planning document.</p> <p><b>North Somerset Local Plan (2038) Sustainability Appraisal Scoping Report (March 2020)</b></p> <p>Thank you for inviting consideration and comment on the scope of the Sustainability Appraisal for the proposed Local Plan. My sincere apologies for the delay in this response.</p> <p>Our planning system is based on the principle of delivering sustainable development, a component of which is making the best of our heritage assets. Heritage will play an increasingly important role in stimulating regeneration post COVID-19, informing sustainable growth and securing positive change that helps safeguard our historic places and heritage assets. Weston super Mare's designation as a Heritage Action Zone illustrates an appreciation and</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>commitment to realising the potential of North Somerset’s distinctive historic character.</p> <p>My comments and response to the following questions can be read in conjunction with guidance prepared by Historic England in relation to the preparation of SEA/SA and the Historic Environment  <a href="https://historicengland.org.uk/images-books/publications/strategic-environment-assessment-sustainability-appraisal-historic-environment/">https://historicengland.org.uk/images-books/publications/strategic-environment-assessment-sustainability-appraisal-historic-environment/</a></p> <ol style="list-style-type: none"> <li>1. <i>Have all relevant plans and programmes been referenced?</i></li> <li>2. <i>Is any significant environmental, social or economic data missing or misrepresented?</i></li> <li>3. <i>Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan document?</i></li> <li>4. <i>Do you agree with the proposed Sustainability Appraisal Framework?</i></li> <li>5. <i>Is the proposed methodology for the next stages of the Sustainability Appraisal correct?</i></li> </ol> <ol style="list-style-type: none"> <li>1. <i>Have all relevant plans and programmes been referenced?</i></li> </ol> <p>Could we encourage inclusion of the following:</p> <p><b>NSC 10 year strategy for heritage, arts and culture</b></p> <p>Objectives include supporting quality placemaking, and building the capacity of local heritage, arts &amp; cultural organisations.</p> <p><b>Great Weston Heritage Action Zone Delivery Plan</b></p>	



Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p><a href="https://historicengland.org.uk/services-skills/heritage-action-zones/weston-super-mare/">https://historicengland.org.uk/services-skills/heritage-action-zones/weston-super-mare/</a></p> <p><a href="https://www.n-somerset.gov.uk/my-business/regeneration/weston-vision/heritage-action-zone/">https://www.n-somerset.gov.uk/my-business/regeneration/weston-vision/heritage-action-zone/</a></p> <ol style="list-style-type: none"> <li>2. <i>Is any significant environmental, social or economic data missing or misrepresented?</i></li> <li>3. <i>Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan document?</i></li> </ol> <p>Our previous consultation response (NS LP Generating ideas Jan 2018 HE.pdf ) highlighted the value of preparing a Heritage Topic Paper setting out the issues, opportunities, risks and challenges facing North Somerset’s historic environment as a part of the preparation of a positive strategy (NPPF para 185). Such explicit evidence would demonstrate a rationale for the Sustainability Appraisal in relation to the historic environment.</p> <p>NSC has prepared Conservation Area Appraisals to consider the condition, risks and opportunities faced by the areas significant historic places. Are they useful references to inform the sustainability issues?</p> <p><b>The adequacy of baseline evidence</b> - The assessment of potential sites across North Somerset will clearly need to be informed by up to date and robust historic environment evidence. Where an initial assessment of the relative impact (positive or negative) on the historic environment/heritage assets and their settings is inconclusive, then further work may be required <u>at this stage</u> to ensure reasonable and informed conclusions can be established as to the likely relative sustainability of emerging proposals.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents										
			<p>We have sometimes found that the implications for the setting of heritage assets is overlooked or ‘parked’ to a later application stage. Where this may be appropriate in some situations Planning Policy Guidance (PPG) is clear that where sites are proposed for allocation, sufficient detail should be given to provide clarity about the nature and scale of development (addressing the ‘what, where, when and how’ questions). To answer such questions one needs to appreciate the implications of conserving affected heritage assets.</p> <p>To reflect the above the following discrete adjustments to Table 11 are suggested.</p> <table border="1" data-bbox="891 683 1794 1377"> <thead> <tr> <th data-bbox="891 683 1061 935">Key Issue</th> <th data-bbox="1061 683 1240 935">Objective</th> <th data-bbox="1240 683 1420 935">Scale of challenge</th> <th data-bbox="1420 683 1599 935">Likely evolution of the issue without the plan</th> <th data-bbox="1599 683 1794 935">Potential role of the North Somerset Local Plan</th> </tr> </thead> <tbody> <tr> <td data-bbox="891 986 1061 1377"> <p><i>Heritage protection</i></p> <p>Or</p> <p><b><u>Protection and</u></b></p> </td> <td data-bbox="1061 986 1240 1377"> <p><b><i>Protection of historical / cultural assets that could be threatened by development and land allocations</i></b></p> </td> <td data-bbox="1240 986 1420 1377"> <p>The District has many listed buildings, archaeological sites and conservation areas. <u>Many heritage assets</u></p> </td> <td data-bbox="1420 986 1599 1377"> <p><b>Major</b></p> <p>Continuation or an increase in historic areas, monuments and buildings on the at-risk</p> </td> <td data-bbox="1599 986 1794 1377"> <p><u>Heritage Assets inc</u> LBs, CAs and <del>Ancient</del> Scheduled Monuments <u>and their settings</u> <del>immediate</del></p> </td> </tr> </tbody> </table>	Key Issue	Objective	Scale of challenge	Likely evolution of the issue without the plan	Potential role of the North Somerset Local Plan	<p><i>Heritage protection</i></p> <p>Or</p> <p><b><u>Protection and</u></b></p>	<p><b><i>Protection of historical / cultural assets that could be threatened by development and land allocations</i></b></p>	<p>The District has many listed buildings, archaeological sites and conservation areas. <u>Many heritage assets</u></p>	<p><b>Major</b></p> <p>Continuation or an increase in historic areas, monuments and buildings on the at-risk</p>	<p><u>Heritage Assets inc</u> LBs, CAs and <del>Ancient</del> Scheduled Monuments <u>and their settings</u> <del>immediate</del></p>	
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Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p><u>enhancement of North Somerset's heritage assets</u> and by neglect through being unoccupied /underused.</p> <p>Or To conserve the significance of North Somerset's cultural heritage and finite heritage assets and their setting, and ensure their potential contributions to social, economic, and environmental objectives are realised.</p> <p>are undesignated.</p> <p>-</p> <p>There are potential risks associated with significant growth from, for example, strategic infrastructure associated with sizeable development, a discordant scale, massing and height of development in historic centres which can result in: a loss or erosion of landscape/ townscape character; an adverse</p> <p>register. Failure of the Plan to support a realisation of the historic environment's potential to support economic, social and environmental objectives.</p> <p>surroundings can all be sustained protected when determining site allocations, and policy. The Plan can also highlight the importance of regenerating threatened assets and identify potential new uses for them, and inspiring/ informing distinctive design and place shaping.</p> <p>-</p> <p>Or</p> <p>-</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p><u>impact on the historic integrity and setting of historic settlements; a direct and or indirect impact upon individual heritage assets and their settings; traffic congestion, air quality, noise or light pollution and other problems affecting the historic environment.</u></p>	<p><u>Ensure the significance of heritage assets is sustained</u></p> <p><u>Develop a stronger sense of place, and local distinctiveness;</u></p> <p><u>Promote the innovative reuse of the existing building stock for social, cultural and or economic purposes;</u></p> <p><u>Deliver heritage-led regeneration opportunities;</u></p> <p><u>Support the vitality and viability of town centre</u></p>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents																	
			<table border="1" data-bbox="891 284 1792 502"> <tr> <td></td> <td></td> <td></td> <td></td> <td data-bbox="1608 331 1776 459"> <u>regeneration;</u>  <u>Promote</u>  <u>heritage based</u>  <u>tourism.</u> </td> </tr> </table> <p data-bbox="949 603 1776 735"> 4. <i>Do you agree with the proposed Sustainability Appraisal Framework?</i>  5. <i>Is the proposed methodology for the next stages of the Sustainability Appraisal correct?</i> </p> <p data-bbox="891 770 1776 834"> To accord with the language and emphasis of national planning policy, could I suggest the following adjustments to the draft framework. </p> <table border="1" data-bbox="891 868 1792 1342"> <thead> <tr> <th data-bbox="891 868 1115 1082">SA Objective</th> <th data-bbox="1115 868 1346 1082">Decision-making criteria (SA will look for...)</th> <th data-bbox="1346 868 1570 1082">Suggested scoring criteria/ Indicator(s)</th> <th data-bbox="1570 868 1792 1082">Relevant SEA topic</th> </tr> </thead> <tbody> <tr> <td colspan="2" data-bbox="891 1082 1346 1198">Positive effect (+/++)</td> <td colspan="2" data-bbox="1346 1082 1792 1198">Negative effect (-/-)</td> </tr> <tr> <td colspan="2" data-bbox="891 1198 1346 1342">Development with access to multiple bus routes.</td> <td colspan="2" data-bbox="1346 1198 1792 1342">Development outside cycling network.</td> </tr> </tbody> </table>					<u>regeneration;</u> <u>Promote</u> <u>heritage based</u> <u>tourism.</u>	SA Objective	Decision-making criteria (SA will look for...)	Suggested scoring criteria/ Indicator(s)	Relevant SEA topic	Positive effect (+/++)		Negative effect (-/-)		Development with access to multiple bus routes.		Development outside cycling network.		
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Respondent Name	Respondent Organisation	Agent Name	Comment					Attached documents
			<p><b>3.5 Minimise impact and where appropriate enhance treasured heritage assets and Conservation</b></p> <p><b><u>To conserve and enhance historic places, heritage assets and their settings</u></b></p>	<p>Development that is likely to safeguard, protect, and where appropriate enhance, the significance of any affected heritage asset, historic townscape or landscape.</p>	<p><del>Development that leads to loss, change or heritage assets.</del></p> <p><del>Development in locations which would harm the</del></p> <div data-bbox="1245 627 1447 810" style="border: 1px solid black; padding: 5px;"> <p><del>character and setting of a heritage asset</del></p> </div> <p><u>Development likely to harm the significance of an affected heritage assets or its setting.</u></p>	<p>Heritage advice likely to be needed on the following:</p> <p><b>[++]</b> enhances heritage assets</p> <p><b>[+]</b> minor positive effect is likely overall on the heritage asset</p> <p><b>[0]</b> site has no known heritage assets within boundary— and would not affect heritage setting.</p>	<p>Cultural heritage</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p data-bbox="1464 331 1603 660">[-] <del>minor</del> negative effect likely overall on <u>minimal</u> harm to the <u>significance</u> of the heritage asset</p> <p data-bbox="1464 703 1603 963">[--] <del>detrimental impacts on</del> <u>considerable</u> harm to the <u>significance</u> of a heritage asset</p> <p data-bbox="1464 1007 1603 1166">[?] likely effect on the heritage asset is uncertain</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>I have CC'd your colleague Kate Hudson-McAulay for information. Kate will be able to further inform your work from a local perspective Kate.Hudson-McAulay@n-somerset.gov.uk</p> <p>Can you please refer to Historic England rather than English Heritage.</p> <p>I hope these comments will help to refine your Sustainability Appraisal, to avoid or minimise any adverse effect, maximise potential benefits, identify appropriate mitigation and in doing so deliver sustainable development.</p>	
St Modwen Developments Ltd	St Modwen Developments Ltd	Avison Young (Pete Stockall)	<p><b>North Somerset Local Plan – Pre commencement Document (March 2020) Representations on Behalf of St Modwen Developments Ltd.</b></p> <p>Context</p> <p>We hereby respond to the above current consultation exercise on behalf St Modwen Developments Ltd who have significant land and development interests within North Somerset including:</p> <ul style="list-style-type: none"> <li>- Locking Parklands, Locking (consented and allocated)</li> <li>- Land West of Kenn Road, Clevedon (identified as site HE1836 in the 2018 SHLAA and current employment allocation).</li> <li>- Former Moss Land, Locking (allocated for residential and consented)</li> <li>- Extension to Former Moss Land, Locking (identified as site HE1832 in the 2018 SHLAA)</li> </ul>	



Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>- Former research station at Hutton Moor, Weston Super Mare (consented for use as plasterboard recycling facility and surrounding land)</p> <p>- Westlands Industrial Estate, Weston-super-Mare</p> <p><b>Paragraph 4 – Previous Consultation</b></p> <p>With the above development interests in mind we wish to reiterate the comments we submitted in response to the Local Plan Issues and Options Plan September 2018 and we welcome the recognition within this latest consultation that these previous responses remain relevant.</p> <p><b>Paragraph 10 - Proposed Strategic Policies</b></p> <p>We support the broad scope of intended strategic policies set out within the document but we would wish to ensure the following issues are specially considered in their drafting and the evidence base underpinning them:</p> <p>- Housing requirement policy – recognition that this is a minimum rather than maximum target.</p> <p>- Spatial strategy and Employment policies – these will require a review to inform the future strategy for Weston Villages with specific reference to the current 1.5 jobs to homes ratio which is proving challenging to deliver. Therefore a renewed approach to strategic employment site provision within Weston will be required. We supported the recognition within the 2018 Issues and Options consultation to re-assessing the existing employment led approach to ensure it remains fit-for purpose. The current global crisis appears to be providing significant momentum to the already changing working practices and different demands for traditional employment space which the Plan will need to consider going forward.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p><b>Paragraphs 10/11 – Non Strategic Policies</b></p> <p>We note reference is made within the Pre-commencement Document and the Local Development Scheme to the inclusion of site allocations within the non-strategic section of the plan. We would consider that there could be potential for a cross over in relation to strategic sites such as Locking Parklands in the Weston Villages which will require careful consideration, notably with regards to employment land provision.</p> <p><b>Paragraph 12 – Evidence Base</b></p> <p>We wish to raise two key points for the evidence base as listed:</p> <ul style="list-style-type: none"> <li>- A robust and consistent review of the role and nature of the Strategic Gaps designations is required if the policy is to be carried forward into the new Plan. The designations restrict the potential expansion of the Weston Villages development, notably the potential to expand the land West of Locking Parklands (extension of former Moss land beyond existing consent and allocation). Without a review of the role and intentions of the designation the overall Plan strategy for assessing growth options will not have been robust, as sustainable locations (such as the above mentioned site which is accepted as such by virtue of adjacent development to date) could be discounted at the expense of less sustainable locations elsewhere in the District.</li> <li>- We would wish to reiterate previously raised concerns with regards to the Council's economic evidence base in terms of reviewing existing employment allocations (including land West of Kenn Road, Clevedon and land within Locking Parklands). We therefore seek clarification that any such economic review is commercially informed including seeking</li> </ul>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>inputs from the site landowners /developers to understand the full picture as to why sites may not be coming forward.</p> <p><b>Other Matters</b></p> <p>We also assume that a review of the existing settlement boundaries will be undertaken noting our previous concerns of anomalies which also need to be considered, Land West of Kenn Road, Clevedon being one where the significant allocation (and adjoining business park) are outside of the settlement boundary and not physically attached to but merit inclusion within the Clevedon boundary.</p> <p>We hope these issues can be considered in the preparation of the next stages of the Local Plan which we understand will be a new Options document in May / June. We would of course welcome the opportunity to discuss these comments further with the Council if it will assist in drafting of the next Plan document.</p>	
Rich Bunce	N/A		<p>Thank you for the opportunity to participate in the consultation on the Pre-commencement Document (March 2020) I hope that I have not missed the opportunity to comment.</p> <p>CV19 will have significant implications for the emerging Local Plan, in terms of the on-going consultation process and effect on everyone's daily way of life across the community. The economic impact in the short and longer term will upend many assumptions in deciding future policy.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>I note that NS have withdrawn from the JSP and are working independently on the Local plan. This could have wider implications in terms of missing out on the opportunities which come from collaboration and working in partnership with Bristol, Bath and North East Somerset and South Gloucestershire.</p> <p>A consideration for towns and villages is addressing the lack of affordable housing and imbalance between the mixes of residential accommodation available to the benefit of the whole community.</p> <p>Linked with this are the significant employment opportunities in and around the Bristol area and the travel and transport implications this has for NS residents. It will be interesting to see how local jobs can be created alongside additional housing development without major improvement and investment in the local infrastructure network.</p>	
The Newcombe Estates Company Limited		James Millard	<p>I am instructed by my client, The Newcombe Estates Company Limited, to submit representations in response to the North Somerset Local Plan Pre-Commencement Document (PCD) consultation. Paragraph 5 of the PCD explains that this is the notice of intent to prepare a new Local Plan for North Somerset for the period 2023 to 2038. As part of this, the PCD describes the scope, methodology and programme for the plan preparation.</p> <p>In response to the Issues and Options consultation (December 2018) representations were submitted on behalf of the Newcombe Estates Company, in respect of land interests at Portbury, and Long Ashton (further details provided below).</p> <p>Our comments as set are provided to support the District Council in the preparation of the Local Plan and to ensure that the evidence base considers all</p>	<a href="#">200422 N Somerset PCD Consultation - Boyer on behalf of The Newcombe Estates Company Ltd.pdf</a>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>reasonable alternatives on a fair and equitable basis. Specifically, we are keen to ensure that when preparing the Local Plan the approach to site selection does not conflate matters of sustainability with other designations, such as the Green Belt.</p> <p><b>Context</b></p> <p>The 2018 Issues and Options consultation was prepared in the context of the West of England Joint Spatial Plan (JSP), and was required to be consistent with the emerging JSP Spatial Strategy, both in terms of the numerical requirement and the planned distribution of growth over the Plan period. The JSP process has now been abandoned, with the District Council, along with Bath and North East Somerset, South Gloucestershire, and Bristol City councils formally withdrawing the submitted JSP.</p> <p>It is explained at paragraph 3 of the PCD that this provides a ‘fresh start’ for the North Somerset Local Plan and an opportunity to reassess the strategic context and spatial strategy options for the district. Whilst this is true, it is important that the preparation of the Local Plan learns from the shortcomings and failings of the JSP, specifically in terms of the evidence base and the obvious lack of consistency and evidence to justify the preferred JSP spatial strategy, including the distribution of development.</p> <p>A key component of the new Local Plan will be the identification of sites/land to accommodate the Local Housing Need (LHN), as calculated using the ‘standard method’.</p> <p>Paragraph 60 of the National Planning Policy Framework (NPPF) is clear that the LHN represents the minimum number of new homes needed and it is</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>only where ‘exceptional circumstances’ can justify an alternative approach, is it appropriate for a local planning authority to deviate from this standard approach.</p> <p>We are reassured that there is no indication within the PCD and supporting documents that would suggest that North Somerset is pursuing a plan based on an alternative method of calculating housing need. It is correct therefore for the new Local Plan to be based on the housing need figures derived from the standard method.</p> <p>The adopted Core Strategy identifies the district’s housing requirement for the plan period 2006-2026 as 20,985 dwellings (1,049 dwellings per year). In comparison, the minimum LHN, based on the standard method equates to 1,369 dwellings, an uplift circa 30%.</p> <p>It should be made clear that this is the minimum required to meet need arising from within the District, it does not take into account any unmet need arising from neighbouring authorities, specifically Bristol City. The precise scale of unmet need to be accommodated within North Somerset will be confirmed through the Duty to Cooperate process, but it is evident that North Somerset will be required to put in place a spatial strategy that responds positively to the challenge of meeting need, both from within the district and through its Duty to Cooperate obligations.</p> <p>Alongside the plan-making process it should also be noted that the district is currently unable to demonstrate a five year housing land supply, with the current calculation indicating supply in the region of 4.4yrs. When the Housing Delivery Test (February 2019) is reviewed for North Somerset, this confirms that North Somerset is only achieving 73% of its Core Strategy housing requirement and as a result a 20% buffer is to be applied to any calculation.</p>	

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			<p>This raises genuine questions as to the effectiveness of the current Spatial Strategy and its ability to deliver existing identified need. In circumstances where the LHN is applied, this will compound further the challenges of housing delivery and require innovative and pragmatic revisions to the current Spatial Strategy.</p> <p>North Somerset is a district that has constraints which in turn reduce the availability of land to meet current and future growth requirements. A key constraint in the district is the Green Belt designation. Through the JSP process it was a recognised component of the Spatial Strategy that ‘exceptional circumstances’ did exist that required land to be released from the Green Belt. Moreover, it was recognised within the JSP evidence base, that avoiding the Green Belt would result in highly unsustainable patterns of development, contrary to the vision and objectives of the JSP.</p> <p>Notwithstanding this, the JSP did not propose any Green Belt release within the North Somerset District. The soundness of such an approach and the consistency with the wider JSP Spatial Strategy was identified by the JSP Inspectors as an area of concern.</p> <p>The approach to Green Belt release through the JSP, as it relates to North Somerset, can be traced back to the adopted Core Strategy. Within the adopted Core Strategy it is listed as a ‘priority objective’ to: <i>“continue to support North Somerset’s existing Green Belt in order to prevent the sprawl of Bristol and its encroachment into valued countryside and to preserve the character of existing settlements.”</i></p>	

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			<p>This is translated into policy within the Core Strategy (Policy CS6) where is states that the Green Belt boundaries will remain unchanged.</p> <p><b>Strategic Policies</b></p> <p>In general the list of Strategic Policies set out at paragraph 10 of the PCD are supported. It is however necessary to ensure that specific policy requirements are based on a robust evidence base, and wider issues such as the impact of policy burdens on the viability and deliverability of sites / development locations assessed at every stage.</p> <p>We also support the inclusion of the Green Belt as a Strategic Policy. However, we are concerned that there is a lack of any specific detail on this and note that the PCD only refers to the need to ‘consider’ whether exceptional circumstances warrant a review of locations within the Green Belt.</p> <p>There is concern that the approach to the Green Belt through the Local Plan process will not consider, in sufficient detail, the opportunities for sustainable development to be provided at sites/locations which do not make an important contribution to the five purposes of the Green Belt as defined in national policy.</p> <p>In this context, Appendix 1 to the SA Scoping Report lists a range of plans, programmes and policies and reviews their relationship with the local plan. For example, in respect of National Planning Policy <b>and Climate change</b>, <b>Appendix 1 states:</b> “<i>Local Policies will need to achieve these objectives</i>”. This ‘relationship’ is therefore how the Local Plan intends to respond to existing plans and programmes etc. Such a review is an important part of the plan-making process, but we are concerned that on specific matters, the commentary set out at</p>	



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			<p>Appendix 1, suggests that the impact (response of Local Plan) in terms of the future Spatial Strategy is already pre-determined.</p> <p>In the context of the Green Belt, Appendix 1 (page 69-70) identifies the requirements and objectives of the NPPF and the ‘protection’ of the Green Belt. It correctly recognises that the Local Plan must conform to these objectives. In terms of the adopted Core Strategy, page 78 of Appendix 1 refers to the objective of continuing to support the ‘existing’ Green Belt and states that the relationship of the Local Plan will be to: <i>“Ensure that commitments identified in the Core Strategy are carried through.”</i></p> <p>Ensuring that commitments identified in the Core Strategy are carried through, prior to any significant progress being made on the Local Plan, suggests that this component of the future spatial strategy has already been decided. Such an approach raises serious concerns that the district council is not treating the withdrawal of the JSP as an opportunity to reassess the fundamentals of Spatial Strategy. The concern is that the district will advance a plan that retains those elements of the JSP Spatial Strategy insofar as they relate to North Somerset, with no genuine consideration of reasonable alternative options for the Spatial Strategy.</p> <p>Given the scale of need arising through the LHN and critical questions regarding the scale of unmet need from Bristol, it would be of major concern if fundamental considerations of the future Spatial Strategy, including whether this will require land from within the Green Belt, are already determined at this ‘pre-commencement stage.</p> <p><b>Approach of Strategic Housing Land Availability Assessment (SHLAA)</b></p>	

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			<p>Paragraph 67 of the NPPF requires local planning authorities to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. It is from this that planning authorities should identify a sufficient supply and mix of sites.</p> <p>The September 2018 SHLAA for North Somerset, is the latest iteration of this evidence base and whilst we would expect this to be updated as the Local Plan progresses, we have significant concerns regarding the consideration of sites currently located with the designated Green Belt.</p> <p>The Part 1 assessment of the 2018 SHLAA discount sites from further assessment if they fall into identified categories. This includes sites in designated SSSI or Flood Zone 3b, but also sites entirely within the Green Belt. Therefore, irrespective of the sustainability attributes of a site, and its ability to provide for sustainable patterns of growth in response to identified needs, sites in the Green Belt are rejected from the outset.</p> <p>Such an approach reinforces our concerns that the priority objective set out in the adopted Core strategy, to retain the existing Green Belt, will be taken forward as a key component of the Local Plan Spatial Strategy.</p> <p>For the North Somerset to advance a spatial distribution strategy which has the retention of the existing Green Belt as a key driver/objective is considered to be a flawed process. The identification of sustainable development opportunities should, in the first instance, be distinct from Green Belt considerations. It is a logical and coherent process to consider development options on a “policy-off” basis, before policy constraints are applied, in order to provide a comprehensive and transparent assessment of site options.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>It is therefore considered essential that the SHLAA methodology is revised to ensure that sites located within the Green Belt are assessed in comparable way to non-Green Belt sites.</p> <p><b>Duty to Cooperate</b></p> <p>In the absence of the JSP process, it is critical that there is a proactive and meaningful engagement with neighbouring authorities, including those which form the West of England Combined Authority.</p> <p>Whilst we recognise that the Duty to Cooperate is not a duty to agree, given the likely significant scale of unmet need arising from Bristol, and the proximity of land within North Somerset which is subject to Green Belt constraints, it is incumbent upon the district council to consider sustainable development opportunities in such locations on a fair and equitable basis. In doing so this will avoid the failings of the JSP process whereby matters of sustainability were artificially conflated with matters of Green Belt.</p> <p><b>Timescales</b></p> <p>We support the District Council in setting out an ambitious timetable for the preparation and adoption of the Local Plan. This will ensure that an appropriate strategic policy framework can be in place at the earliest opportunity.</p> <p>Whilst it is important to pursue this process with some speed, this should not be at the expensive of a sound and comprehensive evidence base. Each stage in the preparation of the Local Plan will be critical and the evidence base should be published in full at each stage in order to provide the confidence that emerging proposals are both justified and effective.</p> <p><b>Land opportunities at Portbury and Long Ashton</b></p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>In response to the 2018 Issues and Options consultation, details of land controlled by our client, were submitted and for the sake of completeness I am pleased to enclose this information for your reference and consideration through the plan-making process.</p> <p><b>Conclusions</b></p> <p>Our comments set out within these representations are submitted without prejudice to comments we intend to make on future stages of the Local Plan process.</p> <p>We recognise that the JSP process has now been abandoned and a new Local Plan for the district is to be prepared. The timetable for doing so is ambitious but this should not be a criticism, unless this timetable prevents or curtails the preparation of a robust evidence base to support future policies, including site allocations, to be identified in the Local Plan.</p> <p>The Strategic Policies set out within the PCD are considered appropriate, however we are concerned that there is no express commitment to undertake a fresh and detailed review of the Green Belt. The existing approach is one that seeks to retain the Green Belt in its current form. In doing so, excluding the consideration of reasonable alternatives, both for the Spatial Strategy and site allocations as part of the plan making process.</p> <p>To advance a spatial distribution strategy which has the retention of the existing Green Belt as a key driver/objective is considered to be a flawed process. The identification of sustainable development opportunities should, in the first instance, be distinct from Green Belt considerations. It is a logical and coherent process to consider development options on a “policy-off” basis, before</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>policy constraints are applied, in order to provide a comprehensive and transparent assessment of site options.</p> <p>It is within this context that land controlled by my client, Portbury and Long Ashton, has been promoted previously through the 2018 Issues and Options process, information for which I am pleased to enclose as part of our comments in response to this PCD consultation.</p> <p>I trust that our representations are clear and should you have any questions or would like to discuss land controlled by my client, I would be very pleased to discuss this with you.</p>	
Curo Group	Curo Group		<p>Thank you for the opportunity to make comments on the Pre-Commencement Document (PCD) that will inform the scope and programme for preparing the New Local Plan. Curo fully supports the content of the document and welcomes the Council's intent to progress preparation of a New Plan without delay now that the West of England Joint Spatial Plan has been abandoned.</p> <p>Our only observation and suggested amendment relates to the local plan timeframe as below:</p> <p><b>Local Plan Timeframe</b></p> <p>The PCD (Paragraph 7) confirms an intention to use a plan period of 2023-2038 though it later confirms the period may be reviewed dependent on progress. Although the current Covid-19 crisis could never have been anticipated, there was always a risk of the new plan being</p>	

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			<p>adopted post-2023 if the West of England JSP, the North Somerset Core Strategy and previous North Somerset Local Plan timetables were used as a guide. The NPPF (Paragraph 22) makes clear that Local Plans should <i>"...look ahead over a minimum 15 year period from adoption..."</i>. It is therefore suggested that the Council adopts a plan period to 2040 to avoid any need to change the timeframe during the preparation of the plan which would risk confusion and potentially delay progress owing to the need to undertake updates to the evidence base.</p> <p>Recommendation: Consideration should be given to a longer plan period now rather than during the preparation of the plan given the risk the plan will be adopted post-2023.</p> <p><b>Future Consultation</b></p> <p>Curo has a long history of investing in the district where we have a number of affordable homes and provide a range of services. We would welcome the opportunity to engage in the plan preparation process and should the Council require any information from us in the meantime, please contact me without hesitation.</p>	
CAD Architects	CAD Architects	AXIS PED	<p>On behalf of our client, CAD Architects, we set out below representations in response to the Regulation 18 Consultation on the North Somerset Local Plan Pre-Commencement Document.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>By way of context, our client represents an individual who has a number of potential sites for residential development in North Somerset.</p> <p>The purpose of this representation is to provide our client's initial comments on the proposed scope and content of the Local Plan, and specifically the strategic policies relating to the Housing Requirement, Green Belt, and the Spatial Strategy for the strategic distribution of housing over the Plan period.</p> <p><b>Housing Requirement</b></p> <p>The Pre-commencement document makes it clear that the forthcoming Local Plan will be very much focussed on the delivery of housing within North Somerset and we welcome the statement within paragraph 8 which confirms the following:</p> <p><i>"Purpose of the Local Plan will be to deliver the number of homes needed for the district over the plan period including the necessary supporting facilities and infrastructure"</i></p> <p>We also support the proposed introduction of a strategic policy on the overall housing requirement in North Somerset (using the standard methodology for the calculation of housing need as the starting point).</p> <p>Whilst we are generally supportive of the overall aims of the emerging plan, it is simply not possible to ignore the long-term failure of North Somerset Council to achieve the necessary rates of delivery in the supply of housing, or indeed the Council's inability to successfully maintain a 5 year supply of housing land. More to the point, the new Local Plan is coming at a time when the Country is in the middle of a housing crisis, with Central Government continuing to promote ambitious targets for the delivery of housing for the foreseeable future.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>The Conservative Government elected in December 2019 has a manifesto pledge to "<i>continue to increase the number of homes being built</i>". The manifesto also refers to a need to rebalance the housing market towards more home ownership:</p> <p><i>"...we will continue our progress towards our target of 300,000 homes a year by the mid-2020s. This will see us build at least a million more homes, of all tenures, over the next Parliament..."</i></p> <p>The use of the standard method to calculate local housing need as a starting point is considered acceptable and in accordance with the Planning Practice Guidance. However, the standard method will only identify a 'minimum' annual housing need figure, it will not produce a housing requirement figure.</p> <p>Given the long-standing issues identified above, we would urge the Council to ensure that they robustly plan for their housing need. This is not a situation where the Council should be trying to meet their minimum requirement, they should ensure that there is more than just 'adequate' provision for housing over the plan period.</p> <p>In the circumstances, the chronic under supply and under delivery of housing in North Somerset should not and indeed, cannot, continue following the adoption of the emerging Local Plan.</p> <p><b>Spatial Strategy and Green Belt</b></p> <p>The pre-commencement document proposes a Strategic Strategy to consider the broad strategic distribution of development, including housing. It also indicates that the Plan will consider whether exceptional circumstances warrant a review</p>	



Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>of locations within the Green Belt. We support the Council's intentions on both matters.</p> <p>There are a number of well know constraints to development in North Somerset the most significant of which are the Avon Green Belt and the Mendip Hills Area of Outstanding Natural Beauty (AONB), which cover over 50% of the land within North Somerset's administrative boundary.</p> <p>The approach within the current North Somerset Local Plan has been to create a settlement hierarchy and a development strategy that specifically seeks to avoid any significant (or even modest) levels of housing development within the Green Belt. This has resulted in only two sites being allocated for housing development in the Green Belt, both of which are on previously developed land. The settlement strategy was similarly stringent with many existing settlements being washed over by Green Belt despite benefitting from a settlement boundary, whilst other significant settlements have no settlement boundary and are regarded as 'countryside'. In addition, the latest North Somerset Strategic Housing Land Availability Assessment (September 2018) discounted all sites located entirely within the Green Belt.</p> <p>Given how much of North Somerset is washed with Green Belt, such an approach will only place an unnecessary burden on the limited number of settlements outside the Green Belt to accommodate new housing development. This is undoubtedly one of the main contributing factor to the sustained poor housing delivery rates and the Council's inability to maintain a 5-year supply of housing land.</p> <p>Given the limited number of settlements outside of the Green Belt, it is inconceivable to think that they can, should or are, indeed, capable of continuing to play host to the vast majority of housing growth between 2023 and 2038.</p>	

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			<p>It is simply no longer acceptable or practical to keep avoiding the issue of development within the Green Belt. There are exceptional circumstances to warrant a review of locations within the Green Belt and this must be given full consideration in the new Local Plan. The Spatial Strategy must consider the release of suitable sites in the Green Belt via strategic locations which can become site allocations through the plan process.</p> <p>The pre-commencement document acknowledges that much of the evidence and feedback from the Local Plan Issues and Options document (September 2018) remains relevant. The 2018 document sought views on new residential development in the Green Belt which included to <i>"Consider the options relating to how settlements in the Green Belt are defined in the Local Plan (through settlement hierarchy and settlement boundary reviews...)"</i>(p15). We see no change in circumstances over the last two years that would suggest that this approach should not be carried through to the emerging Local Plan.</p> <p>In conclusion, there are clearly long-standing and inherent issues in both the delivery and supply of housing within North Somerset, which the emerging Local Plan should robustly address. The only way this is going to be achieved is to move away from the Council's traditional spatial strategy in favour of an approach that allows for a new settlement hierarchy and new settlement boundaries within the Green Belt.</p> <p>We look forward to seeing how the Council develops their strategic policies in the next iteration of the Local Plan.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>Should you require any further information, please do not hesitate to contact me.</p> <p>Yours faithfully,</p> <p>Martin Pollard Technical Director</p>	
Church Commissioners for England		Alice Young-Lee	<p>We write on behalf of our client, the Church Commissioners for England (‘the Church Commissioners’), who manage a well-diversified investment portfolio to support their work across the country. We understand that North Somerset Council (‘the Council’) has withdrawn from the West of England Joint Spatial Plan (‘JSP’), a joint statutory development plan covering the four authorities of Bristol, Bath, North East Somerset and South Gloucestershire. As such, the Council are currently preparing a new Local Plan for North Somerset covering strategic and non-strategic policies for the period 2023-2038.</p> <p>The Church Commissioners recognise the Council’s efforts in preparing the new Local Plan and are pleased to be given the opportunity to comment on the following documents which are being consulted on:</p> <ul style="list-style-type: none"> <li>• North Somerset Local Plan: Pre-commencement Document</li> <li>• Local Development Scheme</li> <li>• PAS Toolkit: Part 1</li> <li>• Sustainability Appraisal Scoping Report</li> </ul>	<p><a href="#">Church Commissioners for England - The Veale Site, Bleadon.pdf</a></p>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p><b>Background</b>  The Church Commissioners previously responded to the Local Plan 2036 Issues and Options document, based on the strategic context set out in the JSP, in December 2018 and the Council’s Generating Ideas consultation on 13 April 2018.</p> <p>The Church Commissioners supported the aims of the emerging plan, although requested that strategic sites did not become the main focus of the plan and that the value of enabling smaller scale developments was also recognised, either through reviewing existing settlement boundaries, or small scale housing allocations. The Commissioners promoted a site which they wholly own, known as Land off the Veale, Bleadon (‘the Site’), to be allocated for residential development within the emerging plan.</p> <p>Much of the evidence and feedback from this consultation remains relevant to the New Local Plan. The Church Commissioners understand however, that withdrawal from the JSP allows for a new approach.</p> <p><b>Site</b>  The Site is an infill plot located within the built up area of the village of Bleadon, although it sits outside the Bleadon settlement boundary. It is used for grazing horses and lies approximately 4 miles from the centre of Weston-Super-Mare. The Site is bounded on its northern, eastern and western boundaries by existing housing, and its southern boundary is bounded by a woodland strip. A Local Wildlife Site (LWS) designation, which is a non-statutory designation to safeguard wildlife sites, covers the entirety of the Site and extends beyond the southern boundary. The LWS classification is a local site designation therefore, it does not imply any legal or statutory status and instead relies upon sympathetic management for their conservation. The Site rises to the southern boundary towards the existing tree line.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>Figure 1 The Veale: see attached.</p> <p>The surrounding area is typified by residential dwellings, which make up the bulk of the settlement of Bleadon. Employment uses in the Village include a concrete paving manufacturer, a flooring contractor, holiday accommodation and agricultural farming operations. Local amenities in Bleadon include the Queens Arms pub and Murco petrol station. Weston General Hospital is located 2.3 miles north-west of the Site and Oldmixon Primary School is located 3 miles to the north of the Site. The Site is not located within a conservation area and there are no listed buildings within close proximity to the Site.</p> <p><b>Planning History</b></p> <p>The Church Commissioners submitted a request for pre-application advice in October 2017 to seek the Council's advice regarding the proposed development of approximately 12 dwellings at the Site.</p> <p>In response to the pre-application advice request, the Council raised the following main planning issues:</p> <ul style="list-style-type: none"> <li>• The impact of development on the Local Wildlife Site and whether this can be mitigated; and</li> <li>• Whether the scheme is compliant with Policy CS33 of the North Somerset Core Strategy.</li> </ul> <p>Historically, as the Site falls wholly within a LWS (South Hill), the potential ecological impacts of development has previously prevented the Council from allocating the Site. Despite this, the pre-application response from the Council accepted that the Site is able to deliver ecological enhancements and has the potential to ensure a biodiversity net gain, over the partial loss of the LWS at the northern extent of the Site.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>In terms of the latter point, currently the Site is outside the settlement boundary for Bleadon and therefore, development would be contrary to Policy CS33 ‘Infill Villages, Smaller Settlements and Countryside’. There was recognition from the Council that the policy was restrictive and they advised, in their pre-application response, that the Church Commissioners should continue to engage in the Development Plan process to promote the potential development of the Site. The Council also advised to engage with Bleadon Parish Council for consideration in their Neighbourhood Plan.</p> <p>Since this pre-application advice, the Church Commissioners have continued to engage in the Development Plan process. There has been ongoing engagement between Bleadon Parish Council and the Church Commissioners which has revealed that the Parish Council are currently in the process of identifying small sites, such as the Site, to allocate in the emerging Neighbourhood Plan.</p> <p><b>Pre-Commencement Document</b>  The Pre-Commencement Document 2020 sets out the scope for the New Local Plan. It sets out 11 key strategic policies which will be contained within the New Local Plan and explains that site allocations will be set out in the non-strategic section of the New Local Plan. The following sets out the Church Commissioners’ response to the relevant strategic aims of the New Local Plan and explains why the Site should be allocated for residential development.</p> <p><u>Housing Requirement</u>  The Council state that their overall housing requirement will be accommodated using the standard method as the starting point. We note that the housing requirement for the Council using the standard method is approximately 1,375 dwellings per year. However this is subject to a 20% buffer because the Council have under delivered in the past. The results of the Council’s 2018 Housing Delivery Test (HDT) and February 2020 HDT results were 73% and 78% respectively.</p>	

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			<p>Additionally, the ‘Residential Land Survey and Five Year Supply Position Statement April 2019’ prepared by the Council highlights that the Council can only demonstrate a 4.4 year housing land supply. Failure to meet housing needs exacerbates unaffordability of housing and reduces the extent to which people can choose to live and work in the local area. It can also lead to housing coming forward in undesirable and unsustainable locations.</p> <p>The Church Commissioners support the Council’s intention to accommodate their housing need as per the standard method and are pleased to note that the Council will use this as a starting point. However, the Church Commissioners urge the Council to apply the 20% buffer as a minimum.</p> <p>To help with the delivery of housing the Council should consider the allocation of a range of housing sites. This should include larger strategic sites and smaller housing sites as per the National Planning Policy Framework (NPPF) 2019. The NPPF (paragraph 67) requires planning policies to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. This includes identifying specific deliverable sites for years one to five of the plan period. Additionally, the NPPF states under paragraph 68 that:</p> <p style="text-align: center;"><i>“small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly”</i></p> <p>It is therefore important that sustainable sites, including infill sites such as the Site, are not restricted from providing residential development to contribute towards meeting the Council’s housing need.</p> <p>The Site abuts the settlement boundary providing a natural village infill in a sustainable location and presents an opportunity to bring underutilised land back</p>	

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			<p>in to meaningful use to deliver valuable new homes for the area. It is also wholly owned by the Church Commissioners and is available to develop immediately. Allocating a small sized site, such as the Site, for residential development can provide housing quicker than relying on larger and longer-term developments to come forward.</p> <p>The Council cannot currently demonstrate a five year housing land supply and results of the two most recent HDTs show that there has been and continues to be an under delivery of housing in the area. Allocations for residential development on sustainably located sites, that can be designed to be in-keeping with the surrounding area and tailored to reflect the local housing need, can provide a valuable contribution to the Council’s housing land supply. Therefore, the Church Commissioners urge the Council to consider the contribution that small sized, sustainable sites, such as the Site, can make in helping the Council deliver much needed housing in the area and to prepare housing policies accordingly.</p> <p><u>Place-making, quality design and provision of community facilities</u> The Church Commissioners support the strategic objective of ‘Place-making, quality design and provision of community facilities’ and consider that any future development that comes forward on the Site is able to shape attractive and healthy communities, provide a sufficient amount of green infrastructure and ensure a high quality of design is achieved that enhances and maintains the local character. The Site is not located within a Conservation Area and there are no listed buildings within close proximity so, there are less restrictions for development.</p> <p>The proposals which were submitted as part of the pre-application advice request were designed to be in accordance with adopted Policy CS12 ‘Achieving high quality design and place making’, which sets out the Council’s commitment to achieving high quality buildings and places. The approach to</p>	



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			<p>place making and design was accepted by the Council, demonstrating that the Site is able to accommodate high quality residential development.</p> <p><u>Environmental and historic conservation and enhancement</u>  The Council's strategic aim of protecting and enhancing landscapes, wildlife and historic assets, strategic green infrastructure and Areas of Outstanding Natural Beauty (AONB) is supported by the Church Commissioners. However, the Church Commissioners encourage the Council to not restrict development coming forward on sites because of existing wildlife designations and where sites can demonstrate sufficient ecological mitigation measures can be implemented to off-set any ecological impacts of the development and improve biodiversity, such as at the Site.</p> <p>The ecological surveys conducted at the Site to support the pre-application advice request identified that the grassland on the northern extent of the Site was of low ecological importance and that the southern extent was of higher ecological value. In response to these findings, the Church Commissioners amended the proposals to deliver fewer homes and committed to restoring and maintain the grassland at the southern extent of the Site. In response, the Council advised that incorporating exemplary enhancement measures, a detailed management plan and demonstrating a net-gain in biodiversity to off-set the loss of the LWS, could enable development to come forward on the Site. The Commissioners have since undertaken further ecological survey work at the Site which demonstrates that impacts on the LWS can be mitigated and that a suitable buffer can be incorporated and confirm that a biodiversity net gain for the Site is achievable.</p> <p>Therefore, the Church Commissioners encourage the Council to be flexible in its approach when balancing the protection and enhancement of the environment with the delivery of new housing in its New Local Plan policies.</p>	

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			<p><b>Sustainability Appraisal Scoping Report</b></p> <p><u>Key Sustainability issues and the North Somerset Local Plan</u></p> <p>In the Sustainability Appraisal Scoping Report (SASR), Table 11: Current and future Sustainability Issues in North Somerset and the role of the North Somerset Local Plan, ‘meeting housing need’ is identified as a key issue and the challenge is identified as providing significant housing growth required over the plan period. As set out in the table, planning policy will be used to require an appropriate level of affordable housing and spatial policies will be used to direct development to the most appropriate location.</p> <p>The Site is located within a sustainable location which abuts the settlement boundary within the village of Bleadon. It is protected by heavy screening to the south of the Site and residential units to the north, east and west. The majority of Bleadon’s local amenities are located within Bleadon’s central and eastern extent, and as such, it is the most sustainable plot in the Village for new residential development. Any future residential development of the Site can be positioned to reflect the layout of the surrounding existing dwellings to ensure that the overall layout and design responds positively to local context and character of the area. Therefore, it is considered that the Site can contribute to meeting local community’s needs for housing, including affordable housing, as set out in the SASR.</p> <p>It also noted within Table 11 that ‘biodiversity and landscape character area protection’ is a key issue and it states that the New Local Plan should ensure that biodiversity and landscape assets are protected and enhanced in new development. The previous development proposals at the Site demonstrate the Church Commissioners commitment to delivering the required ecological mitigation measures to off-set any adverse impacts of development. As noted above, this was also welcomed by the Council in its pre-application response. Therefore, the Church Commissioners consider that development at the Site can</p>	

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			<p>contribute to achieving the SASR objective of protecting and enhancing biodiversity, landscape and character.</p> <p><b>Conclusion</b></p> <p>The Church Commissioners are pleased to have the opportunity to provide comments in relation to the North Somerset Local Plan Pre-Commencement Document Consultation. The Church Commissioners are supportive of the key principles of the documents and would request that the Site is considered for residential development in the emerging Local Plan. The Site would make a valuable contribution to the much needed supply of housing in North Somerset and aid the Council's in being able to demonstrate a 5 year housing land supply, as required by the NPPF.</p>	
Bloor Homes South West		George Wilyman (Turley Associates)	<p>On the behalf of our client <b>Bloor Homes South West Ltd</b> ['Bloor Homes'], we write to provide representations to <b>North Somerset Council</b> [the 'Council'], in relation to the North Somerset Local Plan [the 'NSLP'] Pre-Commencement Document (scope, methodology and programme consultations of March and April 2020).</p> <p>As the Council will already be aware from previous submissions and dialogue, Bloor Homes has a significant interest in land to the north west of Banwell. A site specific location plan is provided at <b>Appendix 1</b> of this correspondence, which confirms the extent of Bloor Homes land interest at Banwell.</p> <p>Given Bloor Homes involvement in land at Banwell, they have an interest in the policies and strategies set out in the emerging NSLP, and are concerned to ensure that an effective and deliverable Local Plan for the area is achieved as soon as possible. Bloor Homes is very keen to ensure that the NSLP will help to</p>	<p><a href="#">Bloor Homes South West - Banwell Comments on NSLP April 2020.pdf</a></p>

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			<p>deliver sustainable development (meeting the areas housing, economic and other needs) and responds to and reflects relevant national planning policy and guidance, as set out within the National Planning Policy Framework (February 2019) [the ‘NPPF’] and associated Planning Practice Guidance [‘PPG’]. In this regard, our comments within this correspondence are set out as follows:</p> <ul style="list-style-type: none"> <li>• Length of the plan period;</li> <li>• The Duty to Co-operate;</li> <li>• Methodology and consistency with the NPPF and the need for sufficient supply of housing;</li> <li>• Employment and economic growth;</li> <li>• Affordable housing provision;</li> <li>• Strategic placement of allocated development;</li> <li>• Timescales for preparation;</li> <li>• Sustainability appraisal scoping report; and</li> <li>• Site specific development opportunities and identified developer.</li> </ul> <p><b>Length of the Plan Period</b></p> <p>Paragraph 5 and 7 of the NSLP Pre-Commencement Document confirm that the intended plan period for the emerging document is 15 years (from 2023, until 2038). Paragraph 22 of the NPPF confirms that in respect of all development (except that related to town centres), strategic policies should look ahead over a minimum 15 year period from the point of adoption.</p> <p>We appreciate that the intended plan period of the emerging NSLP is therefore in accordance with the NPPF, however the NPPF does not place limits on plan periods longer than 15 years. We therefore question why such a short plan period is intended for the NSLP. Having a plan period that is constrained to 15 years would limit the flexibility and the possible level of aspiration for the emerging NSLP. To adequately respond to long-term requirements and</p>	

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			<p>opportunities, such as those arising from major improvements in infrastructure, it is considered that the NSLP would benefit from a longer plan period. This would assist in creating a more robust, comprehensive and ambitious development plan, which would assist in the ability to be forward thinking for the administrative area of North Somerset. The plan period as proposed also raises an issue in respect of how the time period during the preparation of the plan (from now, i.e. 2020) is considered, particularly where relevant evidence to inform the preparation of the plan will be compiled and assessed from this date (i.e. the base date for evidence cannot all start from the intended adoption date in 2023).</p> <p>It is considered that this is a fundamental issue for the plan to get right at the outset of this process.</p> <p><b>Duty to Co-Operate</b></p> <p>On 7 April 2020, the Responsible Officer (on behalf of the four West of England authorities) issued formal correspondence to the Planning Inspectorate withdrawing the West of England Joint Spatial Plan [the ‘JSP’] from Examination. Following the withdrawal of the JSP, we understand that although the current WECA authorities may still collaborate to prepare spatial polices (via a revised spatial framework in some form), this will not directly include NSC (given their current position outside of WECA).</p> <p>Notwithstanding this revised approach (moving away from the JSP), it will remain fundamental that there is still co-operation and joint working between North Somerset and neighbouring authorities, particularly those that make up the rest of the West of England sub-region. This is in the interest of continuing to build upon the economic strength of the Bristol City Region, and reflecting the geography of greater Bristol, where it is not possible that the whole the</p>	

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			<p>city's housing needs can practically be met within their administrative boundary.</p> <p>Paragraph 6 of the Pre-Commencement Document recognises that there is a duty to co-operate on planning issues that cross administrative boundaries. Given the considerable work that was undertaken in preparing the JSP, North Somerset and the other West of England authorities already have a comprehensive understanding of the issues that the region faces and an appreciation of the strategic measures that could be implemented. It is essential that, in the interests of preparing a sound and effective plan, North Somerset continue to actively engage with neighbouring authorities and confirm how this engagement will work in practice (and be documented), particularly in the preparation of the supporting evidence base and other essential inputs to the NSLP.</p> <p>In this regard, Paragraphs 9 and 10 of the Pre-Commencement Document confirm the intention of the NSLP to identify the spatial strategy, strategic and non-strategic policies, where the proposed strategic policies will set the overall housing requirement to be accommodated within North Somerset. In accordance with Paragraph 24 and 25 of the NPPF, it will be essential that in understanding and assessing the overall housing requirement, this will include consideration of any unmet need from other neighbouring authorities (i.e. Bristol). The approach to this issue requires prompt and effective dialogue between the relevant authorities, and for this to be done in a way that is fully considered and evidenced as part of the plan making process; it should be built into the approach from the start, including where relevant in Sustainability Appraisal, so that similar issues as have hampered the JSP are not encountered, and the ambition of a sound and effective new Local Plan at the earliest possible date can be achieved.</p>	

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			<p>As noted in the Commencement Document the approach to the Green Belt will be a critical issue for the NSLP to address, including any need for amendments to be made. It will be essential that a robust approach is taken to strategic policies in this regard, including where relevant having regard to the relationship with neighbouring authorities and the balance to be struck between making provision for development in a variety of locations across the District (which is likely to involve using both Green Belt and non-Green Belt land).</p> <p><b>Methodology and Consistency with the NPPF and the Need for the Sufficient Supply of Housing</b></p> <p>Paragraph 9 and 10 of the Pre-Commencement Document are consistent with the NPPF and PPG in that they confirm that the overall housing requirement within the NSLP will be calculated using the standard method, as the starting point. In general we support this consistency with the NPPF. Notwithstanding this, Paragraph 60 of the NPPF confirms that the standard method should be used to determine the minimum number of homes needed. We would expect future housing requirement policies to make reference to the standard method derived figure as being the minimum new houses needed throughout the plan period, and for the housing policies within the plan to fully and comprehensively reflect other issues associated with economic development, affordability and delivery.</p> <p>The Councils latest Residential Land Survey and Five Year Supply Position Statement of April 2019 confirms that the local authority can only demonstrate 4.4 years of housing supply. This is set against a persistent history of under delivering housing within the authority area. In preparing the NSLP, the Council must fully take account of this failing in the current development plan for North Somerset. In preparing future policies and housing requirements within the NSLP, we request that the Council provide for a broad range of</p>	

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			<p>housing sites, which sufficiently maintain housing supply throughout the emerging plan period.</p> <p><b>Employment and Economic Growth</b></p> <p>Bloor Homes supports reference within Paragraph 10 of the Pre-Commencement Document to the need for strategic policies that focus on employment development. We do however note that when defining the scope of the NSLP in Paragraph 8 of the Pre-Commencement Document, there is no reference to employment development. We wish to highlight that along with the delivery of new housing, it is essential that the NSLP makes provision for and supports employment development and the future economic growth of the administrative area (as part of the wider West of England sub-region, and the ‘Western Gateway’ of which it is a central component). This is particularly so where key parts of infrastructure for the West of England Economy, including but not limited to the Airport, and parts of Bristol Port, are located within North Somerset. There is therefore a need for future policies within the NSLP to specifically make provision for employment and economic growth, and these essential components of sustainable development should be reflected in the strategic policies of the plan (including the provision of housing).</p> <p><b>Affordable Housing Provision</b></p> <p>We appreciate that the Pre-Commencement Document is only an initial indication of the future scope of the NSLP, however we note that within Paragraph 10, which sets out the proposed strategic policies, there is an omission of any reference to affordable housing (and housing affordability). This is clearly an important policy consideration in preparing the NSLP and we would anticipate that affordable housing policies will be included within the NSLP (and that housing affordability in general will be considered throughout). In preparing such policies, it will be essential that they are in accordance with</p>	



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			<p>the NPPF and respond directly to the required need for affordable housing within the administrative area of North Somerset, as well as being informed by appropriate consideration of viability and deliverability through the plan making process.</p> <p><b>Strategic Placement of Allocated Development</b></p> <p>We note that it is the intention of strategic policies within the NSLP to identify broad locations for development, but not to include specific site allocations (as part of the strategic policies). It is the intention for allocations to be set out in the non-strategic section of the development plan. On this basis, it is essential that the strategic policies contained within the NSLP and the proposed site allocations are developed comprehensively and consistently with each other. In preparing the emerging development plan there should be a clear link between the infrastructure requirements that are identified and the specific allocations that come forward. Once adopted the development plan will need to read as one coherent set of specific allocations and policies all of which are deliverable and achievable within the plan period. We request that the next consultation of the NSLP includes a strategy as to how the development plan will be a coherent set of documents, and which confirms how the provision of infrastructure will be linked to any proposed allocations.</p> <p><b>Timescales for Preparation</b></p> <p>Paragraph 18 of the Pre-Commencement Document sets out the proposed timescales for preparing the NSLP. We do not have any specific comments on the timescales, however we reiterate our concern about timely progress and the importance of moving forward with preparation of the NSLP and ensuring North Somerset have an up to date, robust and sound plan at the earliest opportunity. Given the recent withdrawal of the JSP there is no opportunities for</p>	

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			<p>delays and for deviation away from the timescales proposed within Paragraph 18 of the Pre-Commencement Document.</p> <p><b>Sustainability Appraisal Scoping Report</b></p> <p>We note that in support of the Pre-Commencement Document, the Council has also published a Sustainability Appraisal Scoping Report, which forms part of this consultation. As this is only a Scoping Report at this stage, we primarily reserve our full comment until the Issues and Options Consultation in Summer 2020 when we envisage that a more complete Sustainability Appraisal will be available for comment.</p> <p>Notwithstanding this, we would request that in preparing the Sustainability Appraisal, the Council revisit the Sustainability Appraisal Framework provided at Table 13 and ensure that this would provide a robust appraisal. For example, with regards to SA Objective 1.5 ('Development which is unlikely to create excessive infrastructure requirements') it is noted that areas where funding for major infrastructure projects is secured will have a positive effect. However, this positive effect is not carried across within the wording for the scoring criteria. Areas that therefore benefit from such infrastructure funding already in place (such as at Banwell) would not benefit within the scoring criteria.</p> <p>We anticipate that the revised Sustainability Appraisal that will be available within the Issues and Options Consultation will be more robust and we will comment in detail at this point on the intricacies of the evidence base.</p> <p><b>Site Specific Development Opportunities and Identified Developer</b></p> <p>A significant proportion of land to the north west of Banwell, is within the control of Bloor Homes (as the Council is aware following ongoing discussions). The site formed part of a proposed Strategic Development</p>	

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			<p>Location ['SDL'] within the submitted JSP. Bloor Homes are an experienced developer with a proven track record of high quality design, and strategic site delivery.</p> <p>We confirm that the site at Banwell as identified at Appendix 1 of this correspondence is suitable, available and achievable for the development of a new strategic scale development. Development of this site will enable the identified growth needs of the West of England to be met in a sustainable and deliverable way, properly aligned with new infrastructure. In this regard, the Banwell Bypass has already secured funding through the Housing Infrastructure Fund. The proposed development will also assist with the delivery of bus service improvements and unlock the potential for Metrobus (or other forms of public transport) in this area. Public transport connections utilising the proposed bypass will allow for improved access to nearby railways stations and employment hubs (for both existing and new communities).</p> <p>Strategic new community development at Banwell (as anticipated by the previous SDL) will provide an opportunity to create a well-conceived development that is linked into the network of places, in this part of North Somerset, and provides for self-containment in terms of essential services and facilities, such as education and local shopping provision. A development of around 1,900 homes (which could be accommodated on the land controlled by Bloor Homes) and associated employment and mixed uses, triggers a full range of facilities to meet the needs of its residents in surrounding areas. Among other facilities, the new settlement would include primary schools, a local centre, community space, parkland and formal and informal open space, sports facilities and new employment. A Vision Document for strategic development in this location has previously been submitted to the Council, and Bloor Homes look forward to working with the Council and other stakeholders to progress this significant development opportunity.</p>	

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			<p>We trust that this response is useful and will be taken into consideration in the future preparation of the NSLP, and we look forward to engaging with you further. Should you have any queries or questions regarding the above comments or regarding the site at Banwell, we would be very happy to discuss these matters further.</p>	
National Grid (Avison Young)	National Grid		<p>National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p><b>About National Grid</b></p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States.</p> <p><b>National Grid assets within the Plan area:</b></p>	<p><a href="#">National Grid Pre-Commencement Consultation Mar-Apr 20 Assets Map.pdf</a></p>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>Following a review of the above Development Plan Document, we provide details of the National Grid assets below.</p> <p>Hinkley Point C Connection Development Consent Order Area In May 2014 National Grid applied for a Development Consent Order (“DCO”) under the Planning Act 2008 (“PA 2008”) to authorise a proposed 400,000 volt (400kV) connection between Bridgwater, Somerset and Seabank substation, north of Avonmouth together with associated development (“Hinkley Point C Connection”).</p> <p>The Hinkley Point C Connection Project is a Nationally Significant Infrastructure Project under section 14(1)(b) and s16 of the PA 2008. Its purpose is to reinforce the transmission network in the region and facilitate the connection of the proposed Hinkley Point C new nuclear power station and other proposals for low carbon generation. In January 2016, the then Secretary of State for Energy and Climate Change granted consent to National Grid’s DCO application and on 19 January made the National Grid (Hinkley Point C Connection Project) Order 2016 (“the Order”). The Order, which authorises National Grid to construct, operate and maintain the Hinkley Point C Connection and to acquire interests in land compulsorily for that purpose, came into force on 9 February 2016. This Order was subsequently amended by the Secretary of State as the National Grid (Hinkley Point C Connection Project) (Correction) Order 2017 on 19 October 2017.</p> <p>Under the Order, National Grid is granted both permanent and temporary compulsory acquisition powers to construct, operate and maintain the Hinkley Point C Connection. The order sets out six classes under which land or rights may be acquired permanently or land possessed temporarily. In respect of part of the Application Land, National Grid has the following rights:</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<ul style="list-style-type: none"> <li>• Class 2 (Compulsory Acquisition of Rights for the Authorised Development), which also includes Classes 3 (access), 4 (construction and mitigation), 5 (dismantling of redundant infrastructure) and 6 (temporary access);</li> <li>• Class 4 (construction and mitigation); and</li> <li>• Class 5 (dismantling of redundant infrastructure).</li> </ul> <p>It is therefore imperative that any future development proposals progressed through the Local Plan do not compromise or delay National Grid's ability to deliver the Hinkley Point C Connection in accordance with its statutory and contractual duties. National Grid will continue to monitor the progress of the Local Plan and where relevant, comment on and engage with the Council and applicants on specific proposals.</p> <p>Given the scale of the project we have, at this stage, provided an overview plan of the project as it relates to the North Somerset Council area - see attached plan. We would be pleased to provide further information if that would assist the Council in the preparation of the Local Plan. For reference the approved plans and drawings are available at the following web link:</p> <p><a href="https://hinkleyconnection.co.uk/plans-and-drawings/">https://hinkleyconnection.co.uk/plans-and-drawings/</a></p> <p>Please also see attached information outlining further guidance on development close to National Grid assets.</p> <p>Further Advice National Grid is happy to provide advice and guidance to the Council concerning their 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	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.</p>	
L & Q Estates		Barton Willmore	<p><b>1.0 INTRODUCTION</b></p> <p>1.1 These representations are submitted on behalf of L&amp;Q Estates in response to the North Somerset Local Plan 2036 Pre-Commencement consultation (March 2020) in respect of land at Pill, North Somerset. (A site plan is provided on page 12 of the enclosed Masterplan Discussion Document at Appendix A)</p> <p>1.2 The land at Pill (Pill Green) was previously promoted as a Strategic Development Location through the now defunct West of England Joint Spatial Plan (JSP). We consider that there continues to be a compelling case for bringing forward development of around 1,000 homes at Pill Green, which would be sustainably located, deliverable and appropriate.</p> <p>1.3 We would welcome dialogue with North Somerset Council Officers to discuss the delivery of a strategic site at Pill Green and the benefits that infrastructure investment in Pill could bring.</p> <p>1.4 Our representations are set out as follows:</p> <ul style="list-style-type: none"> <li>• Section 1 – Introduction;</li> <li>• Section 2 – Meeting Bristol's unmet need;</li> <li>• Section 3 – Climate Emergency;</li> </ul>	<p><a href="#">L &amp; Q Estates Appendix A.pdf</a></p> <p><a href="#">L &amp; Q Estates Appendix B.pdf</a></p> <p><a href="#">L&amp;Q Estates 25514_NSC new Local plan 2020 final.pdf</a></p>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<ul style="list-style-type: none"> <li>• Section 4 – Green Belt Review;</li> <li>• Section 5 – NSC Sustainability Appraisal;</li> <li>• Section 6 - PAS Toolkit; and</li> <li>• Section 7 – Summary &amp; Conclusion.</li> </ul> <p>1.5 The following documents are appended in support of these representations:</p> <ul style="list-style-type: none"> <li>• Appendix B: Review of NSC SA Scoping Report</li> <li>• Appendix A: Masterplan Discussion Document</li> </ul> <p><b>2.0 MEETING BRISTOL’S UNMET HOUSING NEEDS</b></p> <p>2.1 North Somerset Council has a duty to co-operate<sup>1</sup> on planning issues that cross administrative boundaries – primarily, to ensure that the housing needs of the Bristol urban area can be met.</p> <p>2.2 To ensure that a future Local Plan is capable of being found sound, we consider that the following should be taken in to account when plan-making for North Somerset: 1. The new NSC Local Plan should be based on a joint evidence-base, which is prepared and co-ordinated in a timely manner alongside the other three West of England local authorities; 2. In the absence of the Joint Spatial Plan (JSP), there should be an agreed mechanism to address regional/ spatial planning issues across the West of England that distributes Bristol’s unmet housing need between the authorities of South Gloucestershire, B&amp;NES and North Somerset Council; 3. Based on this process, the NSC Local Plan should clearly state as an objective the need to help accommodate its share of Bristol’s unmet housing needs; 4. Ensure that the NSC Local Plan is based on a clear, high-level spatial strategy for the plan area which identifies how housing, employment and other development should be broadly distributed – which most importantly justifies how the spatial pattern of development meets housing needs where they arise. This reflects the recommendation of the previous JSP</p>	



Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>Inspectors. 5. The Local Plan should, as a starting point, acknowledge that the most sustainable locations to accommodate Bristol’s unmet housing need are on land closest to the Bristol urban area, reducing the need to travel.</p> <p>2.3 It is considered that effective and on-going joint working between the West of England authorities is critical to ensure that the new Local Plan is a positively prepared and justified strategy in accordance with the NPPF2. Furthermore, it is important to remember that North Somerset are duty bound to ensure that, as the Local Planning Authority, their co-operation with neighbouring authorities is effective, constructive, and an ongoing. The Duty to Cooperate is not a “balancing test” and local authorities must meet the requirements in full. This is something which many local authorities have fallen foul of in recent years. Most recently, St. Albans City &amp; District Council were found by an Inspector in August 2016 (and more latterly the High Court) to have failed the Duty to Cooperate in relation to the distribution of unmet housing needs. The Council then submitted a revised plan for examination in spring last year, with progress on the local plan halted once more in January 2020, after planning inspectors cancelled examination hearings scheduled for next month, citing "serious concerns" about the document's "legal compliance and soundness." The Inspectors’ latest report states that St Albans Council has not demonstrated that its approach to the Green Belt has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, in accordance with the National Planning Policy Framework. Another recent example is Sevenoaks District Council, where the Inspector has asked the local authority to withdraw the Plan because the Council has not adequately carried out its duty to co-operate with neighbouring councils to find sites for new homes that cannot be delivered due to constraints such as the Green Belt. The above examples, reiterate the importance of ensuring that North Somerset’s obligations under the Duty to Cooperate are met.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p data-bbox="891 352 1102 384"><u>Land at Pill Green</u></p> <p data-bbox="891 421 1765 552">2.4 We consider that the land at Pill Green is well located to help meet Bristol unmet needs, given the site's close location to the urban area of Bristol; and it provide opportunities to capitalise on existing key sustainable transport infrastructure. We say this because:</p> <ul data-bbox="958 588 1787 1331" style="list-style-type: none"> <li data-bbox="958 588 1765 687">• The site is well connected in respect of public transport with existing bus services providing high frequency services to Bristol City centre throughout the day;</li> <li data-bbox="958 692 1787 823">• The site is well located to benefit of several established local and national cycle routes (National Cycle Route 41) providing connections to Bristol city centre, Clifton, Avonmouth/Sevenside and Portishead among other destinations;</li> <li data-bbox="958 828 1765 959">• The site provides good access to strategic employment sites; Bristol City Centre and the Temple Quarter EZ's 17,000 jobs; key transport infrastructure; M5 Motorway; Pill Railway station; cycle routes to Bristol and Avonmouth / Sevenside;</li> <li data-bbox="958 963 1787 1062">• The development of land at Pill would serve to support the MetroWest scheme and the re-opening of Pill Railway Station specifically, improving travel choices;</li> <li data-bbox="958 1067 1720 1134">• The site offers the opportunity for further improvements, such as extending the MetroBus network along the A369 corridor;</li> <li data-bbox="958 1139 1787 1238">• The site is well located in respect of local facilities and employment areas to reduce short car trips by connecting with sustainable transport modes.</li> <li data-bbox="958 1243 1787 1331">• The site is in close to several major employers: <ul style="list-style-type: none"> <li data-bbox="1059 1267 1765 1331">◦ Avonmouth/Sevenside Enterprise Area, which is a major distribution and manufacturing centre over 18,000 ha in size</li> </ul> </li> </ul>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>of internationally significant scale; and which plans to create 6,000-14,000 jobs in the next 10 years. The X3 and X5 services from the Pill Green towards Avonmouth and Severnside. The site is also within 20-minutes cycle of Avonmouth;</p> <ul style="list-style-type: none"> <li>◦ Filton Enterprise Area in the north Fringe, which is an advanced engineering and aerospace centre and home to key companies such as Airbus, RollsRoyce, and GKN; and which has capacity for 7,000 to 12,000 jobs in the next 10 years; and</li> <li>◦ Bristol Temple Quarter Enterprise Zone, which is a creative, technology, communications, financial and professional services centre, which will generate 17,000 jobs.</li> </ul> <p><b>3.0 CLIMATE CHANGE EMERGENCY</b></p> <p>3.1 We support the Local Plan’s proposed strategy to address climate change (para. 10):</p> <p><i>“Addressing Climate Change: Maximise sustainability, carbon reduction, renewable energy, focus on active travel and public transport, flood risk and coastal change, food production, greening.”</i></p> <p>3.2 We understand that this reflects the Council’s Climate Emergency Strategic Action Plan<sup>3</sup>, which sets out several principles to help reduce emissions from transport:</p> <p><b><i>1. “Continue to drive project delivery to shift from private car use ;</i></b>  <b><i>2. Develop policies that actively encourage the demand for and delivery of connected public transport ;</i></b>  <b><i>3. Develop and secure funding for projects to grow the walking and cycling</i></b></p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p><i>network across the district ;</i></p> <p><b>4.Implement our project to deliver an electric charging hub in Portishead ;</b></p> <p><b>5.Require all schools to deliver travel plans which maximise the number of students walking, cycling, or travelling sustainably to school ;</b></p> <p><b>6.Review parking planning guidance note to consider maximum parking levels and reduce the number of spaces delivered for new development ;</b></p> <p><b>7.Encourage resident parking schemes, car sharing schemes and walking and cycling to support ; and</b></p> <p><b>8.Encourage our residents to consider their transport choices .”</b></p> <p>3.3 It is vitally important to ensure that the new Local Plan addresses and mitigates the impacts of Climate Change. Perhaps of most importance to achieving this aim is to ensure that the new Local Plan encapsulates the most sustainable patterns and distribution of development across the district.</p> <p>3.4 This means focussing new development on land within the inner edge of the Green Belt near the Bristol urban area and in accessible locations where housing and employment needs arise; and on land that has a limited contribution to the function of the Green Belt – such as the land at Pill Green.</p> <p><u>Land at Pill Green</u></p> <p>3.5 By way of example, residential development at Pill Green would help to achieve several principles Council’s Climate Emergency Strategic Action Plan:</p> <p><b>4.0 GREEN BELT REVIEW</b></p> <p>4.1 We note that paragraph 12 of the Pre-Commencement document refers to the preparation of a Green Belt Review for North Somerset, which is welcomed.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>4.2 We consider that a comprehensive review of the Green Belt is required at a much finer grain than was completed for the previous JSP Green Belt Assessment. The new assessment must look at options for Green Belt releases at a closer scale and identify the extent to which they support Green Belt objectives.</p> <p>4.3 To ensure that a future Local Plan is capable of being found sound, it needs to set out an appropriate strategy for the distribution of development across the district in accordance with the JSP Inspector’s recommendations. To do this it must avoid overinflating the protection of the Green Belt above the need to identify sustainable patterns of development. We consider the most sustainable pattern of development includes land located close to the existing urban centre of Bristol and its employment and services – thereby reducing the need to travel.</p> <p><i>Land at Pill Green</i></p> <p>4.4 We consider that the land at Pill Green makes only a limited contribution to Green Belt purposes. The table below provides an assessment of Pill Green’s performance against the purposes of the Green Belt.</p> <p><b>5.0 NSC SUSTAINABILITY APPRAISAL SCOPING REPORT</b></p> <p>5.1 A review of the supporting Sustainability Appraisal (SA) Scoping Report has been undertaken (Appendix B). Whilst comments on the Scoping Report are formally invited only from three statutory environmental bodies: Environment Agency; Historic England; and Natural England, this review has been undertaken as part of the evidence base to promote Land at Pill Green. The review report also includes a preliminary appraisal of the Land at Pill Green against the sustainability objectives of the framework proposed in the Scoping</p>	

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			<p>Report.</p> <p>5.2 SA of a Local Plan must comply with the Environmental Assessment of Plans and Programmes Regulations 2004 (the “SEA Regulations”) and Section 19 of the Planning and Compulsory Purchase Act, which sets out requirements for SA. SA is a complex and legalistic process and should be undertaken iteratively, alongside the preparation of the Plan. A Local Plan must be prepared in accordance with Section 39 of the Act “with the objective of contributing to the achievement of sustainable development”. It should therefore be informed by the SA process, which itself must comply with the SEA Regulations.</p> <p>5.3 Scoping is the first stage of SA. It sets the framework for the process to follow so it is important at it is robust for a plan to be found sound at Examination. It is much more difficult and less credible to try to retrofit or remedy deficiencies in the SA process retrospectively. Therefore, the review focuses on the adequacy of the approach and content of the SA Scoping Report, with particular focus on the set of objectives proposed to form the SA Framework for the main appraisal of the Local Plan, to be undertaken at a later stage.</p> <p>5.4 The SA Scoping Report is considered to comply with the requirements of the SEA Regulations and Section 19 of the Planning &amp; Compulsory Purchase Act. Suggestions have been made, that if actioned and addressed in the next stage of the SA process, would be considered to improve its relevance and ensure a flexible and forward-looking approach to policy and potential site allocations, in a regulatory and policy environment that is changing rapidly.</p> <p>5.5 The Land at Pill Green scores very strongly against the proposed framework of sustainability objectives and is therefore considered to be a highly sustainable location for much-needed housing, that can be delivered quickly within the plan</p>	

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			<p>period and, importantly, reduce the need to travel by car due to its proximity to Bristol, nearby facilities and the ability to make use of the existing strong network of sustainable transport modes.</p> <p><b>6.0 PAS TOOLKIT EVIDENCE BASE</b></p> <p>6.1 We have provided commentary on the PAS Local Plan Toolkit evidence base document, to ensure that the fundamentals of the new Local Plan review are correct.</p> <p>6.2 The PAS Local Plan Toolkit sets out a series of questions that plan-makers should consider when reviewing their Local Plan. We have highlighted 2 questions (under the headings below) which we have provided further commentary on:</p> <p>A2: There has not been a significant change in local housing need numbers from that specified in your plan ?</p> <p>6.3 We agree that there has been a change in housing numbers and the Government's Standard Methodology should be the starting point for district's housing requirement. However, there is an acute housing crisis within the West of England and there is no mention here of the requirement for North Somerset to help meet the unmet housing needs of Bristol. Furthermore, it is very important that North Somerset Council plans for the right number of affordable homes, which have historically been under-delivered within the district. It is important that the Plan's future housing is positively prepared and meets the district's full affordable housing needs.</p> <p>A6: There have been no significant changes in economic conditions which</p>	

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			<p>could challenge the delivery of the Plan, including the policy requirements within it.</p> <p>6.4 We agree that forecasts for economic growth and corresponding jobs growth is indicating a significant increase compared to the levels previously planned for in the adopted Core Strategy. Increased employment prospects have implications for the scale of housing required. This, together with the increasing climate change action and its impacts on commuter patterns means there continues to be a case for more substantial housing allocations closer to Bristol.</p> <p><b>7.0 SUMMARY &amp; CONCLUSION</b></p> <p>7.1 These representations are submitted on behalf of L&amp;Q Estates in response to the North Somerset Local Plan 2036 Pre-Commencement consultation (March 2020) in respect of land at Pill, North Somerset. (A site plan is provided on page 12 of the enclosed Masterplan Discussion Document at Appendix A)</p> <p>7.2 The land at Pill (Pill Green) was previously promoted as a Strategic Development Location through the now defunct West of England Joint Spatial Plan (JSP). We consider that there continues to be a compelling case for bringing forward development of around 1,000 homes at Pill Green, which would be sustainably located, deliverable and appropriate.</p> <p>7.3 North Somerset Council has a duty to co-operate on planning issues that cross administrative boundaries. In doing so, there is an onus on the authority to ensure that the housing needs of the Bristol urban area can be met. To ensure that a future Local Plan is capable of being found sound the following should be taken in to account when plan-making for North Somerset:</p>	



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			<p>1. The new NSC Local Plan should be based on a joint evidence-base, which is prepared and co-ordinated in a timely manner alongside the other three West of England local authorities;</p> <p>2. In the absence of the Joint Spatial Plan (JSP), there should be an agreed mechanism to address regional/spatial planning issues across the West of England that distributes Bristol's unmet housing need between the authorities of South Gloucestershire, B&amp;NES and North Somerset Council;</p> <p>3. Based on this process, the NSC Local Plan should clearly state as an objective the need to help accommodate its share of Bristol's unmet housing needs; and</p> <p>4. The Local Plan should, as a starting point, acknowledge that the most sustainable locations to accommodate Bristol's unmet housing need are on land closest to the Bristol urban area, reducing the need to travel.</p> <p>7.4 We support the Local Plan's proposed strategy to address climate change and, in doing so, we believe it is important that the new Plan encapsulates the most sustainable patterns of development across the district. This means focussing new development on land within the inner edge of the Green Belt near the Bristol urban area and in accessible locations where housing and employment needs arise; and on land that has a limited contribution to the function of the Green Belt – such as the land at Pill Green.</p> <p>7.5 We note that paragraph 12 of the Pre-Commencement document refers to the preparation of a Green Belt Review for North Somerset, which is welcomed. We consider that a comprehensive review of the Green Belt is required at a much finer grain than was completed for the previous JSP Green Belt Assessment. The new assessment must look at options for Green Belt releases at a closer scale and identify the extent to which they support Green Belt</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>objectives.</p> <p>7.6 We consider that the land at Pill Green is well located to help meet Bristol unmet needs and deliver sustainable development to meet the Climate Emergency. We say this because:</p> <ul style="list-style-type: none"> <li>• The site is well connected in respect of public transport with existing bus services providing high frequency services to Bristol City centre throughout the day;</li> <li>• The site is well located to benefit of several established local and national cycle routes (National Cycle Route 41) providing connections to Bristol city centre, Clifton, Avonmouth/Sevenside and Portishead among other destinations;</li> <li>• The site provides good access to strategic employment sites; Bristol City Centre and the Temple Quarter EZ's 17,000 jobs; key transport infrastructure; M5 Motorway; Pill Railway station; cycle routes to Bristol and Avonmouth / Sevenside;</li> <li>• The development of land at Pill would serve to support the MetroWest scheme and the re-opening of Pill Railway Station specifically, improving travel choices;</li> <li>• The site offers the opportunity for further improvements, such as extending the MetroBus network along the A369 corridor;</li> <li>• The site is well located in respect of local facilities and employment areas to reduce short car trips by connecting with sustainable transport modes.</li> <li>• The site is in close to several major employers including Avonmouth/ Sevenside Enterprise Area; Filton Enterprise Area in the north Fringe, which is an advanced engineering and aerospace centre and home to key companies such as Airbus, RollsRoyce and GKN; and Bristol</li> </ul>	

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			<p>Temple Quarter Enterprise Zone, which is a creative, technology, communications, financial and professional services centre.</p> <p>7.7 We would welcome dialogue with North Somerset Council Officers to discuss the delivery of a strategic site at Pill Green and the benefits that infrastructure investment in Pill could bring.</p>	
Rentplus UK Ltd		Tetlow King (admin)	<p>Thank you for the opportunity to comment on the Pre-Commencement Consultation for the emerging North Somerset Local Plan. We represent <b>Rentplus UK Ltd</b>, an innovative company providing <b>affordable rent-to-buy housing</b> for hard-working people aspiring to home ownership. Rentplus provides an accessible route to achieve their dream through the rent - save - own model. Households rent the property for a defined period at an affordable rent and then receive a gifted 10% deposit upon purchase. Rentplus has recently been recognised by the National Housing Awards as the Most Innovative Home Ownership Solution for 2019.</p> <p>The first section of these representations introduces the Rentplus model and sets out recent developments which underline the importance of the rent-to-buy model. The second section provides specific comments on the emerging Local Plan.</p> <p><b>Introducing Rentplus</b></p> <p>The Rentplus model of affordable rent-to-buy aims to help those hard-working families and households unable to access ownership either through shared ownership, starter homes or homes on the open market, to overcome the mortgage ‘gap’. This is achieved through a defined period of affordable Intermediate Rent at no more than 80% of local market value (including service</p>	<a href="#">0715-333.M15 North Somerset Pre-Commencement.pdf</a>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>charge) during which all Rentplus residents are able to save towards a deposit to supplement the 10% gifted deposit received from Rentplus.</p> <p>It is important to note that in 2018 the National Planning Policy Framework (the 'Framework') was revised to incorporate a wider definition of affordable housing, now providing four categories; rent-to-buy is included within category d) Other affordable routes to homeownership. The revised Framework also expanded the scope of 'Affordable housing for rent' to include not just 'traditional' affordable and social rented housing, but any scheme which meets criteria where the rent is at least 20% below local market rents, where the landlord is a registered provider, and where any public subsidy is recycled for future provision. Rentplus (working with its partner Registered Providers) meets each of these criteria; it does not rely on public subsidy and therefore there is no requirement to recycle it. The then- Planning Minister confirmed in a letter in 2019 that Rentplus meets the Government's expectation of rent to buy (see <b>Appendix 1</b>).</p> <p>In this context, the Rentplus model is a hybrid and falls within both categories of affordable housing, as either part of the 'affordable housing to rent' element, or as an 'affordable route to home ownership'. This has also been recognised by several councils such as Plymouth, West Devon, South Hams, Mid Devon, Dorset, South Somerset, Sedgemoor, Cotswolds, Cherwell, Northampton, Wellingborough and Fenland Councils, all of whom Rentplus has worked with to deliver homes in recent years.</p> <p>The Rentplus model offers the opportunity for the Council and Registered Providers (RPs) to diversify the local housing offer without further recourse to public subsidy. The affordable rented period provides families and households with security of tenure, with certainty of management and maintenance by a local partner RP, and critically the opportunity to save towards purchase. As affordable rent to buy meets needs for affordable rent (the only difference being marked by the expectation by all parties of purchase), it comes with a</p>	

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			<p>significant benefit of freeing up existing affordable rented homes for others in priority need, as demonstrated by Rentplus schemes across England. Rentplus works with a wide range of Registered Providers; this currently includes Willow Tree Housing (South West Housing Society and Tamar Housing) and Stonewater.</p> <p>In diversifying the overall housing mix, Rentplus can help to create mixed and balanced communities. Rentplus tenants are on a clear path to homeownership, meaning they are more likely to remain in their property for the long-term and therefore better settle into their community. This helps to create a stronger sense of place in new developments in the long run.</p> <p><b>Comments on the Pre-Commencement Consultation</b></p> <p>Rentplus welcomes the Council’s decision to prepare a new Local Plan. This will ensure the Council is well-placed to meet the housing needs of its residents into the future.</p> <p>The scope of the Local Plan set out at paragraphs 9 and 10 are supported. The production of a new ‘single’ Local Plan means that a full suite of strategic and development management policies can be prepared. Affordable housing encompasses both aspects of policy meaning that issues relating to the delivery of affordable housing can be considered ‘in the round’.</p> <p>As part of this, there is the opportunity for policies to be updated to ensure they are consistent with the Framework and enable the full range of affordable housing tenures to come forward. The Council is at an early stage in plan preparation; it is therefore a good opportunity to make sure that the evidence base, including the Strategic Housing Market Assessment, fully assess the need for affordable housing including affordable rent to buy. Rentplus has worked with Lichfields to prepare a methodology for identifying needs for affordable</p>	

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			<p>rent to buy homes and this is provided at <b>Appendix 2</b> for the Council's consideration. We would be very happy to discuss in more detail the Rentplus model and how affordable rent to buy can be provided for in planning policy.</p> <p><b>Summary and Conclusion</b></p> <p>Rentplus can assist in meeting local need, allocating all of its residents through the Housing Allocation Scheme; by enabling real savings to be built while renting at an affordable rent the Council can help meet the needs of low and middle income households, providing greater choice and flexibility in the planning system.</p> <p>At this early stage in plan preparation, we consider it is important that North Somerset Council's evidence base fully assesses the need for all affordable tenures including affordable rent to buy. This will provide a firm basis for taking forward the strategic and detailed policies that the emerging Plan will eventually contain.</p> <p>We trust the above comments are of assistance to the Council. Should the Council wish to discuss how affordable housing delivery and rent-to-buy can best meet local needs in North Somerset, please get in touch. We would like to be notified of further consultations; please notify <b>Tetlow King Planning</b> as agents of Rentplus by email only to <a href="mailto:consultation@tetlow-king.co.uk">consultation@tetlow-king.co.uk</a>.</p>	
Bloor Homes South West		George Wilyman (Turley Associates)	On the behalf of our client Bloor Homes South West Ltd ['Bloor Homes'], we write to provide representations to North Somerset Council [the 'Council'], in relation to the North Somerset Local Plan [the 'NSLP'] Pre-Commencement	<a href="#">Bloor Homes South West - Churchill Comments on NSLP April 2020.pdf</a>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>Document (scope, methodology and programme consultations of March and April 2020).</p> <p>As the Council will already be aware from previous submissions and dialogue, Bloor Homes has a significant interest in land to the north of Churchill. A site specific location plan is provided at Appendix 1 of this correspondence, which confirms the extent of Bloor Homes land interest at Churchill.</p> <p>Given Bloor Homes involvement in land at Churchill, they have an interest in the policies and strategies set out in the emerging NSLP, and are concerned to ensure that an effective and deliverable Local Plan for the area is achieved as soon as possible. Bloor Homes is very keen to ensure that the NSLP will help to deliver sustainable development (meeting the areas housing, economic and other needs) and responds to and reflects relevant national planning policy and guidance, as set out within the National Planning Policy Framework (February 2019) [the ‘NPPF’] and associated Planning Practice Guidance [‘PPG’]. In this regard, our comments within this correspondence are set out as follows:</p> <ul style="list-style-type: none"> <li>• Length of the plan period;</li> <li>• The Duty to Co-operate;</li> <li>• Methodology and consistency with the NPPF and the need for sufficient supply of housing;</li> <li>• Employment and economic growth;</li> <li>• Affordable housing provision;</li> <li>• Strategic placement of allocated development;</li> <li>• Timescales for preparation;</li> <li>• Sustainability appraisal scoping report; and</li> <li>• Site specific development opportunities and identified developer.</li> </ul> <p><b>Length of the Plan Period</b></p>	

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			<p>Paragraph 5 and 7 of the NSLP Pre-Commencement Document confirm that the intended plan period for the emerging document is 15 years (from 2023, until 2038). Paragraph 22 of the NPPF confirms that in respect of all development (except that related to town centres), strategic policies should look ahead over a minimum 15 year period from the point of adoption.</p> <p>We appreciate that the intended plan period of the emerging NSLP is therefore in accordance with the NPPF, however the NPPF does not place limits on plan periods longer than 15 years. We therefore question why such a short plan period is intended for the NSLP. Having a plan period that is constrained to 15 years would limit the flexibility and the possible level of aspiration for the emerging NSLP. To adequately respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure, it is considered that the NSLP would benefit from a longer plan period. This would assist in creating a more robust, comprehensive and ambitious development plan, which would assist in the ability to be forward thinking for the administrative area of North Somerset. The plan period as proposed also raises an issue in respect of how the time period during the preparation of the plan (from now, i.e. 2020) is considered, particularly where relevant evidence to inform the preparation of the plan will be compiled and assessed from this date (i.e. the base date for evidence cannot all start from the intended adoption date in 2023).</p> <p>It is considered that this is a fundamental issue for the plan to get right at the outset of this process.</p> <p><b>Duty to Co-Operate</b></p> <p>On 7 April 2020, the Responsible Officer (on behalf of the four West of England authorities) issued formal correspondence to the Planning Inspectorate withdrawing the West of England Joint Spatial Plan [the 'JSP'] from</p>	



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			<p>Examination. Following the withdrawal of the JSP, we understand that although the current WECA authorities may still collaborate to prepare spatial polices (via a revised spatial framework in some form), this will not directly include NSC (given their current position outside of WECA).</p> <p>Notwithstanding this revised approach (moving away from the JSP), it will remain fundamental that there is still co-operation and joint working between North Somerset and neighbouring authorities, particularly those that make up the rest of the West of England sub-region. This is in the interest of continuing to build upon the economic strength of the Bristol City Region, and reflecting the geography of greater Bristol, where it is not possible that the whole the city's housing needs can practically be met within their administrative boundary.</p> <p>Paragraph 6 of the Pre-Commencement Document recognises that there is a duty to co-operate on planning issues that cross administrative boundaries. Given the considerable work that was undertaken in preparing the JSP, North Somerset and the other West of England authorities already have a comprehensive understanding of the issues that the region faces and an appreciation of the strategic measures that could be implemented. It is essential that, in the interests of preparing a sound and effective plan, North Somerset continue to actively engage with neighbouring authorities and confirm how this engagement will work in practice (and be documented), particularly in the preparation of the supporting evidence base and other essential inputs to the NSLP.</p> <p>In this regard, Paragraphs 9 and 10 of the Pre-Commencement Document confirm the intention of the NSLP to identify the spatial strategy, strategic and non-strategic policies, where the proposed strategic policies will set the overall housing requirement to be accommodated within North Somerset. In accordance with Paragraph 24 and 25 of the NPPF, it will be essential that in understanding</p>	

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			<p>and assessing the overall housing requirement, this will include consideration of any unmet need from other neighbouring authorities (i.e. Bristol). The approach to this issue requires prompt and effective dialogue between the relevant authorities, and for this to be done in a way that is fully considered and evidenced as part of the plan making process; it should be built into the approach from the start, including where relevant in Sustainability Appraisal, so that similar issues as have hampered the JSP are not encountered, and the ambition of a sound and effective new Local Plan at the earliest possible date can be achieved.</p> <p>As noted in the Commencement Document the approach to the Green Belt will be a critical issue for the NSLP to address, including any need for amendments to be made. It will be essential that a robust approach is taken to strategic policies in this regard, including where relevant having regard to the relationship with neighbouring authorities and the balance to be struck between making provision for development in a variety of locations across the District (which is likely to involve using both Green Belt and non-Green Belt land).</p> <p><b>Methodology and Consistency with the NPPF and the Need for the Sufficient Supply of Housing</b></p> <p>Paragraph 9 and 10 of the Pre-Commencement Document are consistent with the NPPF and PPG in that they confirm that the overall housing requirement within the NSLP will be calculated using the standard method, as the starting point. In general we support this consistency with the NPPF. Notwithstanding this, Paragraph 60 of the NPPF confirms that the standard method should be used to determine the minimum number of homes needed. We would expect future housing requirement policies to make reference to the standard method derived figure as being the minimum new houses needed throughout the plan period, and for the housing policies within the plan to fully and</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>comprehensively reflect other issues associated with economic development, affordability and delivery.</p> <p>The Councils latest Residential Land Survey and Five Year Supply Position Statement of April 2019 confirms that the local authority can only demonstrate 4.4 years of housing supply. This is set against a persistent history of under delivering housing within the authority area. In preparing the NSLP, the Council must fully take account of this failing in the current development plan for North Somerset. In preparing future policies and housing requirements within the NSLP, we request that the Council provide for a broad range of housing sites, which sufficiently maintain housing supply throughout the emerging plan period.</p> <p><b>Employment and Economic Growth</b></p> <p>Bloor Homes supports reference within Paragraph 10 of the Pre-Commencement Document to the need for strategic policies that focus on employment development. We do however note that when defining the scope of the NSLP in Paragraph 8 of the Pre-Commencement Document, there is no reference to employment development. We wish to highlight that along with the delivery of new housing, it is essential that the NSLP makes provision for and supports employment development and the future economic growth of the administrative area (as part of the wider West of England sub-region, and the ‘Western Gateway’ of which it is a central component). This is particularly so where key parts of infrastructure for the West of England Economy, including but not limited to the Airport, and parts of Bristol Port, are located within North Somerset. There is therefore a need for future policies within the NSLP to specifically make provision for employment and economic growth, and these essential components of sustainable development should be reflected in the strategic policies of the plan (including the provision of housing).</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p><b>Affordable Housing Provision</b></p> <p>We appreciate that the Pre-Commencement Document is only an initial indication of the future scope of the NSLP, however we note that within Paragraph 10, which sets out the proposed strategic policies, there is an omission of any reference to affordable housing (and housing affordability). This is clearly an important policy consideration in preparing the NSLP and we would anticipate that affordable housing policies will be included within the NSLP (and that housing affordability in general will be considered throughout). In preparing such policies, it will be essential that they are in accordance with the NPPF and respond directly to the required need for affordable housing within the administrative area of North Somerset, as well as being informed by appropriate consideration of viability and deliverability through the plan making process.</p> <p><b>Strategic Placement of Allocated Development</b></p> <p>We note that it is the intention of strategic policies within the NSLP to identify broad locations for development, but not to include specific site allocations (as part of the strategic policies). It is the intention for allocations to be set out in the non-strategic section of the development plan. On this basis, it is essential that the strategic policies contained within the NSLP and the proposed site allocations are developed comprehensively and consistently with each other. In preparing the emerging development plan there should be a clear link between the infrastructure requirements that are identified and the specific allocations that come forward. Once adopted the development plan will need to read as one coherent set of specific allocations and policies all of which are deliverable and achievable within the plan period. We request that the next consultation of the NSLP includes a strategy as to how the development plan will be a coherent set of documents, and which confirms how the provision of infrastructure will be linked to any proposed allocations.</p>	

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p><b>Timescales for Preparation</b></p> <p>Paragraph 18 of the Pre-Commencement Document sets out the proposed timescales for preparing the NSLP. We do not have any specific comments on the timescales, however we reiterate our concern about timely progress and the importance of moving forward with preparation of the NSLP and ensuring North Somerset have an up to date, robust and sound plan at the earliest opportunity. Given the recent withdrawal of the JSP there is no opportunities for delays and for deviation away from the timescales proposed within Paragraph 18 of the Pre-Commencement Document.</p> <p><b>Sustainability Appraisal Scoping Report</b></p> <p>We note that in support of the Pre-Commencement Document, the Council has also published a Sustainability Appraisal Scoping Report, which forms part of this consultation. As this is only a Scoping Report at this stage, we primarily reserve our full comment until the Issues and Options Consultation in Summer 2020 when we envisage that a more complete Sustainability Appraisal will be available for comment.</p> <p>Notwithstanding this, we would request that in preparing the Sustainability Appraisal, the Council revisit the Sustainability Appraisal Framework provided at Table 13 and ensure that this would provide a robust appraisal. For example, with regards to SA Objective 1.5 ('Development which is unlikely to create excessive infrastructure requirements') it is noted that areas where funding for major infrastructure projects is secured will have a positive effect. However, this positive effect is not carried across within the wording for the scoring criteria. Areas that therefore benefit from such infrastructure funding already in place would not benefit within the scoring criteria.</p>	

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			<p>We anticipate that the revised Sustainability Appraisal that will be available within the Issues and Options Consultation will be more robust and we will comment in detail at this point on the intricacies of the evidence base.</p> <p><b>Site Specific Development Opportunities and Identified Developer</b></p> <p>A significant proportion of land to the north of Churchill, is within the control of Bloor Homes (as the Council is aware following ongoing discussions). The site formed part of a proposed Strategic Development Location ['SDL'] within the submitted JSP. Bloor Homes are an experienced developer with a proven track record of high quality design, and strategic site delivery.</p> <p>We confirm that the site at Churchill as identified at Appendix 1 of this correspondence is suitable, available and achievable for the development of a new strategic scale development. Development of this site will enable the identified growth needs of the West of England to be met in a sustainable and deliverable way, properly aligned with new infrastructure. The strategic new community of Churchill provides an opportunity to create a self-sustaining settlement. A development of 2,800 homes and associated employment and mixed uses, triggers a full range of facilities to meet the needs of its residents in surrounding areas. Among other facilities, the new settlement would include new schools, a local centre, community space, parkland, and sports facilities. Creation of a strategic development of this scale with critical mass to deliver its own infrastructure and facilities would reduce development impacts on existing communities and allow for a comprehensively planned development with supporting uses planned from the outset.</p> <p>The provision of a strategic new community in this location is consistent with national policy and will be able to make a significant contribution to the long-term growth required for North Somerset, whilst also addressing many of the future infrastructure needs of this area of North Somerset.</p>	

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			<p>We trust that this response is useful and will be taken into consideration in the future preparation of the NSLP and we look forward to engaging with you further. Should you have any queries or questions regarding the above comments or regarding the site at Churchill, we would be happy to discuss these matters further.</p>	
Bloor Homes South West and Aston & Co		jeff.richards	<p><b>NORTH SOMERSET LOCAL PLAN: PRE-COMMENCEMENT DOCUMENT (MARCH AND APRIL 2020 CONSULTATION) – REPRESENTATIONS ON BEHALF OF BLOOR HOMES SOUTH WEST LTD, LAND TO THE SOUTH WEST OF PORTISHEAD AT BLACK ROCK</b></p> <p>On the behalf of our client <b>Bloor Homes South West Ltd and Aston &amp; Co</b> [the ‘Representors’], we write to provide representations to <b>North Somerset Council</b> [the ‘Council’], in relation to the North Somerset Local Plan [the ‘NSLP’] Pre-Commencement Document (scope, methodology and programme consultations of March and April 2020).</p> <p>Bloor Homes has a significant interest in land to the south west of Portishead, Black Rock. A site specific location plan is provided at <b>Appendix 1</b> of this correspondence, which confirms the extent of the Representors’ land interest at Black Rock.</p> <p>Given the Representors’ involvement in land at Black Rock, they have an interest in the policies and strategies set out in the emerging NSLP, and are concerned to ensure that an effective and deliverable Local Plan for the area is achieved as soon as possible. Bloor Homes is very keen to ensure that the NSLP will help to deliver sustainable development (meeting the areas housing, economic and other needs) and responds to and reflects relevant national</p>	<p><a href="#">BLOA3029 - Black Rock Comments on NSLP April 2020.pdf</a></p>

Respondent Name	Respondent Organisation	Agent Name	Comment	Attached documents
			<p>planning policy and guidance, as set out within the <b>National Planning Policy Framework</b> (February 2019) [the ‘NPPF’] and associated <b>Planning Practice Guidance</b> [‘PPG’]. In this regard, our comments within this correspondence are set out as follows:</p> <ul style="list-style-type: none"> <li>• Length of the plan period;</li> <li>• The Duty to Co-operate;</li> <li>• Methodology and consistency with the NPPF and the need for sufficient supply of housing;</li> <li>• Employment and economic growth;</li> <li>• Affordable housing provision;</li> <li>• Strategic placement of allocated development;</li> <li>• Timescales for preparation;</li> <li>• Sustainability appraisal scoping report; and</li> <li>• Site specific development opportunities and identified developer.</li> </ul> <p><b>Length of the Plan Period</b></p> <p>Paragraph 5 and 7 of the NSLP Pre-Commencement Document confirm that the intended plan period for the emerging document is 15 years (from 2023, until 2038). Paragraph 22 of the NPPF confirms that in respect of all development (except that related to town centres), strategic policies should look ahead over a minimum 15 year period from the point of adoption.</p> <p>We appreciate that the intended plan period of the emerging NSLP is therefore in accordance with the NPPF, however the NPPF does not place limits on plan periods longer than 15 years. We therefore question why such a short plan period is intended for the NSLP. Having a plan period that is constrained to 15 years would limit the flexibility and the possible level of aspiration for the emerging NSLP. To adequately respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure,</p>	



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			<p>it is considered that the NSLP would benefit from a longer plan period. This would assist in creating a more robust, comprehensive and ambitious development plan, which would assist in the ability to be forward thinking for the administrative area of North Somerset. The plan period as proposed also raises an issue in respect of how the time period during the preparation of the plan (from now, i.e. 2020) is considered, particularly where relevant evidence to inform the preparation of the plan will be compiled and assessed from this date (i.e. the base date for evidence cannot all start from the intended adoption date in 2023).</p> <p>It is considered that this is a fundamental issue for the plan to get right at the outset of this process.</p> <p><b>Duty to Co-Operate</b></p> <p>On 7 April 2020, the Responsible Officer (on behalf of the four West of England authorities) issued formal correspondence to the Planning Inspectorate withdrawing the West of England Joint Spatial Plan [the ‘JSP’] from Examination. Following the withdrawal of the JSP, we understand that although the current WECA authorities may still collaborate to prepare spatial polices (via a revised spatial framework in some form), this will not directly include NSC (given their current position outside of WECA).</p> <p>Notwithstanding this revised approach (moving away from the JSP), it will remain fundamental that there is still co-operation and joint working between North Somerset and neighbouring authorities, particularly those that make up the rest of the West of England sub-region. This is in the interest of continuing to build upon the economic strength of the Bristol City Region, and reflecting the geography of greater Bristol, where it is not possible that the whole the city’s housing needs can practically be met within their administrative boundary.</p>	

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			<p>Paragraph 6 of the Pre-Commencement Document recognises that there is a duty to co-operate on planning issues that cross administrative boundaries. Given the considerable work that was undertaken in preparing the JSP, North Somerset and the other West of England authorities already have a comprehensive understanding of the issues that the region faces and an appreciation of the strategic measures that could be implemented. It is essential that, in the interests of preparing a sound and effective plan, North Somerset continue to actively engage with neighbouring authorities and confirm how this engagement will work in practice (and be documented), particularly in the preparation of the supporting evidence base and other essential inputs to the NSLP.</p> <p>In this regard, Paragraphs 9 and 10 of the Pre-Commencement Document confirm the intention of the NSLP to identify the spatial strategy, strategic and non-strategic policies, where the proposed strategic policies will set the overall housing requirement to be accommodated within North Somerset. In accordance with Paragraph 24 and 25 of the NPPF, it will be essential that in understanding and assessing the overall housing requirement, this will include consideration of any unmet need from other neighbouring authorities (i.e. Bristol). The approach to this issue requires prompt and effective dialogue between the relevant authorities, and for this to be done in a way that is fully considered and evidenced as part of the plan making process; it should be built into the approach from the start, including where relevant in Sustainability Appraisal, so that similar issues as have hampered the JSP are not encountered, and the ambition of a sound and effective new Local Plan at the earliest possible date can be achieved.</p> <p>As noted in the Commencement Document the approach to the Green Belt will be a critical issue for the NSLP to address, including any need for amendments to be made. It will be essential that a robust approach is taken to strategic</p>	

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			<p>policies in this regard, including where relevant having regard to the relationship with neighbouring authorities and the balance to be struck between making provision for development in a variety of locations across the District (which is likely to involve using both Green Belt and non-Green Belt land).</p> <p><b>Methodology and Consistency with the NPPF and the Need for the Sufficient Supply of Housing</b> Paragraph 9 and 10 of the Pre-Commencement Document are consistent with the NPPF and PPG in that they confirm that the overall housing requirement within the NSLP will be calculated using the standard method, as the starting point. In general we support this consistency with the NPPF. Notwithstanding this, Paragraph 60 of the NPPF confirms that the standard method should be used to determine the <i>minimum</i> number of homes needed. We would expect future housing requirement policies to make reference to the standard method derived figure as being the minimum new houses needed throughout the plan period, and for the housing policies within the plan to fully and comprehensively reflect other issues associated with economic development, affordability and delivery.</p> <p>The Councils latest Residential Land Survey and Five Year Supply Position Statement of April 2019 confirms that the local authority can only demonstrate 4.4 years of housing supply. This is set against a persistent history of under delivering housing within the authority area. In preparing the NSLP, the Council must fully take account of this failing in the current development plan for North Somerset. In preparing future policies and housing requirements within the NSLP, we request that the Council provide for a broad range of housing sites, which sufficiently maintain housing supply throughout the emerging plan period.</p> <p><b>Employment and Economic Growth</b></p>	

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			<p>Bloor Homes supports reference within Paragraph 10 of the Pre-Commencement Document to the need for strategic policies that focus on employment development. We do however note that when defining the scope of the NSLP in Paragraph 8 of the Pre-Commencement Document, there is no reference to employment development. We wish to highlight that along with the delivery of new housing, it is essential that the NSLP makes provision for and supports employment development and the future economic growth of the administrative area (as part of the wider West of England sub-region, and the ‘Western Gateway’ of which it is a central component). This is particularly so where key parts of infrastructure for the West of England Economy, including but not limited to the Airport, and parts of Bristol Port, are located within North Somerset. There is therefore a need for future policies within the NSLP to specifically make provision for employment and economic growth, and these essential components of sustainable development should be reflected in the strategic policies of the plan (including the provision of housing).</p> <p><b>Affordable Housing Provision</b></p> <p>We appreciate that the Pre-Commencement Document is only an initial indication of the future scope of the NSLP, however we note that within Paragraph 10, which sets out the proposed strategic policies, there is an omission of any reference to affordable housing (and housing affordability). This is clearly an important policy consideration in preparing the NSLP and we would anticipate that affordable housing policies will be included within the NSLP (and that housing affordability in general will be considered throughout). In preparing such policies, it will be essential that they are in accordance with the NPPF and respond directly to the required need for affordable housing within the administrative area of North Somerset, as well as being informed by appropriate consideration of viability and deliverability through the plan making process.</p>	

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			<p><b>Strategic Placement of Allocated Development</b></p> <p>We note that it is the intention of strategic policies within the NSLP to identify broad locations for development, but not to include specific site allocations (as part of the strategic policies). It is the intention for allocations to be set out in the non-strategic section of the development plan. On this basis, it is essential that the strategic policies contained within the NSLP and the proposed site allocations are developed comprehensively and consistently with each other. In preparing the emerging development plan there should be a clear link between the infrastructure requirements that are identified and the specific allocations that come forward. Once adopted the development plan will need to read as one coherent set of specific allocations and policies all of which are deliverable and achievable within the plan period. We request that the next consultation of the NSLP includes a strategy as to how the development plan will be a coherent set of documents, and which confirms how the provision of infrastructure will be linked to any proposed allocations.</p> <p><b>Timescales for Preparation</b></p> <p>Paragraph 18 of the Pre-Commencement Document sets out the proposed timescales for preparing the NSLP. We do not have any specific comments on the timescales, however we reiterate our concern about timely progress and the importance of moving forward with preparation of the NSLP and ensuring North Somerset have an up to date, robust and sound plan at the earliest opportunity. Given the recent withdrawal of the JSP there is no opportunity for delays or for deviation away from the timescales proposed within Paragraph 18 of the Pre-Commencement Document.</p> <p><b>Sustainability Appraisal Scoping Report</b></p>	

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			<p>We note that in support of the Pre-Commencement Document, the Council has also published a Sustainability Appraisal Scoping Report, which forms part of this consultation. As this is only a Scoping Report at this stage, we primarily reserve our full comment until the Issues and Options Consultation in Summer 2020 when we envisage that a more complete Sustainability Appraisal will be available for comment.</p> <p>Notwithstanding this, we would request that in preparing the Sustainability Appraisal, the Council revisit the Sustainability Appraisal Framework provided at Table 13 and ensure that this would provide a robust appraisal. For example, with regards to SA Objective 1.5 ('Development which is unlikely to create excessive infrastructure requirements') it is noted that areas where funding for major infrastructure projects is secured will have a positive effect. However, this positive effect is not carried across within the wording for the scoring criteria. Areas that therefore benefit from such infrastructure funding already in place would not benefit within the scoring criteria.</p> <p>We anticipate that the revised Sustainability Appraisal that will be available within the Issues and Options Consultation will be more robust and we will comment in detail at this point on the intricacies of the evidence base.</p> <p><b>Site Specific Development Opportunities and Identified Developer</b></p> <p>A significant proportion of land at Black Rock, North Weston is within the control of Bloor Homes and has been promoted through the forward plan system by Aston &amp; Co since 2016. Bloor Homes are an experienced developer with a proven track record of high quality design, and delivery of a range of site scales.</p> <p>Within the existing Core Strategy for North Somerset, Portishead is identified as one of the two key North Somerset towns. It is suggested that this designation is</p>	

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			<p>carried over to the emerging NSLP. The settlement should retain a central and important role in the Council's spatial strategy given the opportunity to work with the excellent facilities and services on offer and planned improvements to infrastructure and connectivity. North Somerset Council submitted a Development Consent Order in November 2019 to reopen the Portishead to Parson Street (Bedminster, Bristol) railway line for passenger use. The scheme will include the opening of a new railway station in the centre of Portishead and provide an opportunity for betterment to the accessibility for residents of Portishead (present and future) into the city of Bristol.</p> <p>Despite its merits as a location to accommodate housing growth, the settlement is highly constrained in planning terms. The settlement, and potential logical directions for growth, are all washed over by the Bristol-Bath Green Belt. Some potential housing sites on the eastern side of the settlement are all at risk of flooding, and there are other areas around the settlement that are very visually exposed and/or less well connected to the heart of the town and the excellent facilities and services offer.</p> <p>Whilst the site is at present designated as part of the Green Belt, compared to other sites in Portishead, the site is:</p> <ul style="list-style-type: none"> <li>• Very well connected to the Town Centre, and more closely to the Gordano School;</li> <li>• In a unique position to deliver an improvement to non-car modes of transport infrastructure through the Gordano Greenway project;</li> <li>• Within an area of landscape where development can be sensitively planned and contained;</li> <li>• Free from Flood Risk or drainage issues; and</li> <li>• When assessed for its contribution to Green Belt purposes, it was found that the site only contributes to preventing merger between Clevedon and Portishead to a limited extent, and beyond that only</li> </ul>	

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			<p>assists in safeguarding the countryside from encroachment (a role any land could fulfil).</p> <p>We trust that this response is useful and will be taken into consideration in the future preparation of the NSLP and we look forward to engaging with you further. Should you have any queries or questions regarding the above comments or regarding the site at Black Rock, we would be happy to discuss these matters further.</p>	

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