



North Somerset Local Plan 2038: Preferred Options Consultation (Reg 18)

Consultation Statement

Main Report

August 2022

Contents

1. Consultation Method and Response.....	3
Introduction	3
Background	3
Purpose of the consultation.....	4
Who was consulted?	5
How we consulted.....	5
Level of response.	7
2. Summary of responses.....	8
Strategic Policies	8
Locational Policies	14
Development Policies	22
3. Town and Parish Council Summary of Responses	29
4. Next Steps.....	44

1. Consultation Method and Response.

Introduction

- 1.1 This document explains how North Somerset Council undertook consultation on the North Somerset Local Plan 2038: Preferred Options document. It sets out how the Council sought participation from communities and stakeholders across North Somerset. It covers:
- Which bodies and persons were invited to make comments.
 - How those bodies and persons were invited to make comment.
 - The material that was subject to consultation.
 - A summary of the issues raised.
 - How the comments received will shape the next version of the plan.
- 1.2 This consultation statement complies with the North Somerset's [Statement of Community Involvement](#) (SCI) 2019. The SCI outlines that the Council is committed to effective community engagement and seeks to use a wide range of methods for involving the community in the plan making process.
- 1.3 It sets out how the Council will involve the community and stakeholders in the preparation, alteration and review of local planning policy and the consideration of planning applications. The SCI proposed that the consultation methods and those engaged would vary according to the purpose of the consultation and the bodies or persons who the Council were keen to involve.

Background

- 1.4 The new Local Plan for North Somerset was launched in March 2020 with the publication of the Local Development Scheme (LDS), which set out the timetable for the Local Plan, and the Pre-commencement Document which outlined the proposed scope of the content. These two publications marked the formal start of the process. Consultation on the Pre-commencement document ran from 10 March until 22 April 2020.
- 1.5 Following the launch of the new Local Plan two consultations were undertaken focusing on the challenges the Local Plan would have to address and the various choices on how spatially the plan could address these challenges. The two consultations were called Challenges for the Future and Choices for the Future.
- 1.6 The [Challenges for the Future](#) consultation focussed on the key high level issues facing North Somerset over the plan period such as the climate emergency, provision of housing, supporting the economy, creating sustainable development, the future role of the Green Belt and protecting the natural environment. The document also included a proposed vision and strategic priorities. This consultation took place from 22 July to 2 September 2020. It sought the views of local communities, businesses, and the development industry on issues the Local Plan would need to address, and the responses received

helped to inform the second stage of consultation which focused on the choices around the strategic approach to new development.

- 1.7 The [Choices for the Future](#) document set out four broad spatial development alternatives for discussion. These were Retain the Green Belt, Urban Focus, Transport Corridors and Greater Dispersal. Overall, taking 'strongly support' and 'support' together, Urban Focus was most favoured by respondents, although Retain Green Belt was very close behind and scored better in terms of 'strongly support'. Transport Corridors was roughly 50/50 in terms of overall support/objection. The Greater Dispersal approach was significantly less well supported.
- 1.8 The response to the Challenges and Choices consultations and an assessment of emerging evidence enabled the formulation of a 'spatial strategy' which would provide the framework for the next stage of plan preparation. The spatial strategy was agreed by Executive Committee on 28 April 2021 for further testing and assessment and to act as the framework for the preparation of the Preferred Options document.
- 1.9 The Local Plan Preferred Options consultation document, along with many supporting documents which provided the evidence and justification for the policies and allocations within the emerging plan, is the first full draft of a new Local Plan. It contained:
 - Strategic Policies: These policies set out the overall strategy for the pattern, scale and design of places, make sufficient provision for housing, employment and other uses, infrastructure, community facilities, conservation and the enhancement of the built and historic environment and address climate change and mitigation. These are high level policies which provide the framework for more detailed policies in the plan and for neighbourhood plans.
 - Locational Policies: These comprise allocations and other designations which are identified on the Policies Map.
 - Development Policies: These are the detailed development management policies which cover a wide range of issues including design, residential infilling, climate change, net zero construction, renewable energy, drainage, transport, economic development, town centres, green infrastructure, affordable housing, rural development and infrastructure delivery.

Purpose of the consultation

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

Engagement with Business

An article publicising the consultation was featured in the In North Somerset newsletter which goes to 1800 recipients in the business community.

Promotion of the consultation on the In North Somerset social media feeds.

Weston College distributed the Local Plan consultation postcards at a series of business workshops that they were holding during the consultation period.

Level of response.

- 1.15 There were **739** respondents to the consultation with a total of **4227** comments. Of the 739 around 200 respondents submitted their representation by e-mail and the remaining respondents responded online. All comments are available to view on our online consultation system either against each policy within the document or for each respondent.

Town and Parish Councils

- 1.16 24 town and parish councils responded to the consultation (out of 39) with many of their comments mirroring the responses of the wider community within each area. Some of the issues specific to their areas raised by each town and parish council are summarised in Section 3 of this report. Many further detailed comments were also made by the town and parish councils and these are captured in in the appendices against each policy or site.

Site submissions

- 1.17 There were over 100 sites submitted to the consultation for consideration as potential allocations for various uses, but predominantly housing. The majority of these were either resubmissions of sites we were already aware of and which have been assessed though the Strategic Housing Land Availability Assessment (SHLAA) or adjustments to an existing site. There were also a number of completely new sites that hadn't been submitted in any previous consultations or through a 'call for sites' process.

2. Summary of responses.

Strategic Policies

Most comments (1,563) were submitted in relation to the Strategic Policies. The following summarises the main concerns and issues raised in relation to strategic policies. There was quite a bit of overlap in relation to comments received on these policies given the interrelationships between them.

SP1: Sustainable Development

A total of 153 comments were received in relation to this policy. 44% objections, 30% Support with amendments, 26% support.

There was broad support for the high level principles contained in the policy but some concern regarding how effective in practice they would be in terms of providing clear guidance and how they are reflected in the other policies and proposed allocations set out in the plan. While the delivery of sustainable development was accepted as being a fundamental principle, some felt that as this was already set out in government guidance, the policy was unnecessary.

Some representations considered that the policy should be redrafted to be more clearly related to the other policies and the requirements made more specific rather than being presented as a checklist. Others felt that the policy should be strengthened to emphasise the climate emergency and commitment to net zero commitment.

There was quite a bit of overlap between comments received to this and several other strategic policies, particularly SP2 climate change, SP3 spatial strategy and SP8 housing which demonstrated some confusion between the scope of each. A number of respondents used the policy to demonstrate how in their view it was not being consistently applied in terms of, for example, development in villages (especially Backwell), use of Green Belt and green field sites, and implications for car use and biodiversity.

SP2: Climate Change

A total of 122 comments were received in relation to this policy. 20% objections, 52% Support with amendments, 28% support.

There was a clear distinction between those representations who supported the approach and felt that it should go further, and those who expressed concerns about its deliverability. Supporters of the policy emphasised the imperative to act on climate change, the importance of the net zero and links to the nature emergency and how this should lead to a fundamental reappraisal of the form and location of new development. Others, particularly from the development industry raised concerns about the lack of viability evidence and how this might impact on delivery. Others questioned the net zero approach and the need for local standards and whether the

policy was justified given changes to building regulations. There were concerns that the policy provided insufficient flexibility and also that the policy requirements lacked detail.

SP3: Spatial Strategy

A total of 196 comments were received in relation to this policy. 50% objections, 33% Support with amendments, 17% support.

Policy SP3 sets out the broad framework for where development should be located and the themes covered often overlap with other strategic policy areas. In respect of those respondents who indicated that they supported the policy with amendments, there were a range of views submitted in terms of the degree of support for the strategy and which aspects they had issues with. There was often a dichotomy of views presented on the principal objectives of the strategy depending on the perspective of the respondent, with largely the local community view contrasting with the development industry promoting sites.

Overall the spatial strategy was broadly supported as the framework for delivering sustainable development. The prioritisation of previously developed sites, urban sites and optimising densities were supported, as was the principle of wherever possible locating development which was easily accessible to services, facilities, jobs and good public transport. There was a general recognition that the scale of development at villages and in the rural areas should be relatively less, and that Green Belt should be considered last.

However, while there was broad high-level agreement on the principles, there was a wide range of views on how these should be interpreted in practice. In particular, what was the appropriate scale and location of development in villages and whether this could or should be restricted to 'local community needs', whether Green Belt release was appropriate and the scale and type of development which might be acceptable, and whether development on land at risk of flooding (with appropriate mitigation) was preferable to Green Belt.

These issues are bound up with the scale of the housing challenge facing North Somerset. The Preferred Options acknowledged that there was a significant shortfall in relation to the standard method target and much of the response from the development industry in particular was in relation to ways of increasing capacity.

SP4: Placemaking

A total of 76 comments were received in relation to this policy. 14% objections, 51% support with amendments, 34% support.

Several development industry representations questioned the appropriateness of a placemaking policy as this was imposing unreasonable requirements over and above national policy and which could delay delivery, and that it was unrealistic to require community collaboration on a matter as subjective as design. On the other hand community engagement on proposals was generally supported.

There were concerns that that new development had not been of sufficient quality and that a policy was required to ensure standards improved, particularly in terms of reflecting local character. There were some concerns that the proposed strategic development sites are contrary to the placemaking principles set out in this policy and that greater emphasis should be placed on recognising the character, identity and wellbeing of existing villages and residents.

SP5: Towns

A total of 40 comments were received in relation to this policy. 14% objections, 51% support with amendments, 35% support.

There was general support with the principle of focusing development opportunities at the towns and the objectives set out in the policy. However, there were concerns about the lack of clarity in respect of transport and other infrastructure to support the new development. Some felt there should be more guidance about the type and mix of housing to be provided and greater emphasis on creating 20 minute communities and reducing reliance on the car. Some developers called for a retention of the policy approach which allowed development adjacent to settlement boundaries.

SP6: Villages and rural areas

A total of 125 comments were received in relation to this policy. 49% objections, 32% support with amendments, 19% support.

There was concern from many communities that the approach to development in rural areas was too permissive and was in conflict with the broader strategic principles relating to sustainable development and the climate emergency. Many responses related to the need to resist speculative development pressures in villages and there was concern that the proposed allocations in the plan were inconsistent with the policy as set out in SP6. However, there was significant support from communities and residents for the new policy approach which no longer allows development sites to come forward adjacent to settlement boundaries. It was felt this give communities more certainty regarding what development will be coming forward and stop speculative development.

In contrast many developer representations felt the approach was too restrictive and that there should be more flexibility such as by retaining the approach which allowed development adjacent to settlement boundaries. Others felt we should be encouraging growth at sustainable villages to provide deliverable housing sites to meet local needs and to support local facilities.

SP7: Green Belt

A total of 224 comments were received in relation to this policy. 56% objections, 27% support with amendments, 17% support.

General concern over the perceived absence of traffic assessment and detail regarding the transport strategy. Also concern over the deliverability of proposals including costing.

SP11: Green infrastructure and historic environment

A total of 78 comments were received in relation to this policy. 15% objections, 51% support with amendments, 33% support.

There was strong support for the overall approach towards green infrastructure and the historic environment in terms of protecting and enhancing the environment, supporting biodiversity and its contribution to wellbeing. However, there were detailed representations made commenting on how the policy should be applied and interpreted, and how the issues should be assessed in the overall planning balance. Many respondents felt that the scale of development proposed in the plan and the impact of developing on green field sites was in conflict with the overall objectives set out in the policy. Clarity was requested on the approach to Nature Parks.

SP12: Minerals

A total of 14 comments were received in relation to this policy. 4 objections, 5 Support with amendments, 5 support.

There was concern about the impact of continued quarrying, and that quarrying needs better regulating, having regard to local traffic, lorries and the routes they use, fumes, noise, need for wheel washing, etc. There were concerns expressed around the impact on local roads and the living conditions of residents and on the wider highway network and some detailed comments received in relation to policy wording.

There was concern about the environmental impact of quarrying and a desire for this to be assessed, and about the need for mitigation regarding bats. There were comments relating to safeguarding and the Mineral Safeguarding Area.

Locational Policies

The locational policies received 926 comments across all the policies. The most comments were in relation to the policies relating to the strategic locations of Yanley Lane, Wolverhill and Nailsea/Backwell, as well as the settlement boundary and Green Belt policies. Below is a summary of the key concerns and issues raised in relation to the locational policies.

LP1: Strategic location: Wolverhill (north of Banwell)

A total of 47 comments were received in relation to this policy. 21% objections, 51% support with amendments, 28% support.

Some comments focus on the principle of development in this location including some suggestion that housing is preferable closer to Bristol, and that too much growth is proposed in this area. Conversely some support due to proximity to Weston-super-Mare, such as for employment access and infrastructure such as Worle train station.

Potential developers of the strategic site expressed broad support but questioned whether the number of dwellings should be expressed as a minimum, and whether there was potential for increased capacity on this site, and also to reduce the proposed scale of employment provision.

Some support for the principles of development as identified in draft Policy LP1 and features such as the proposed Strategic Gap between Banwell and the new development. Also support for the recognition of importance of green infrastructure, for habitat, environmental, and recreational benefit.

Significant concern over proposals related to transport and highway impacts. Traffic concerns include reference to the impacts of the Banwell Bypass on nearby communities, and also potential of closing Wolverhill Road to through traffic. Some comments referenced the need for additional transport mitigations including the J21 relief road. In general, with comments received to this, and other policies in the plan, there is support for active travel modes including cycling.

Some comments on the potential for impact upon sensitive species and habitats as well as the AONB to the south of the proposed development.

LP2: Strategic location: Yanley Lane (Woodspring golf course)

A total of 107 comments were received in relation to this policy. 66% objections, 19% support with amendments, 15% support.

Many respondents objected to the principle of building in the Green Belt as well as loss of wildlife, open space, recreation and impact of surrounding areas. Some felt the scale of development was too big whilst others felt there needed to be a longer time horizon given to the strategic sites in order to fully understand their requirements.

However, the principle of settlements boundaries was supported overall as a policy tool. Some respondents felt that the boundaries were still being drawn too tightly around settlements and should include more potential infill plots.

LP7: Town centre hierarchy

A total of 15 comments were received in relation to this policy. 29% (3) objections, 47% (7) Support with amendments, 33% (5) support.

There were relatively few comments made on this policy. In general no concerns were raised about the hierarchy of centres or the general approach.

LP8: Extent of the Green Belt

A total of 118 comments were received in relation to this policy. 60% objections, 26% Support with amendments, 14% support.

Opposition to changing the GB generally centered on whether exceptional circumstances had been demonstrated, challenging the housing target, and whether all reasonable alternatives outside the Green Belt had been considered. Others who were looking to develop additional sites in the Green Belt questioned whether the Green Belt review should have been more comprehensive and considered other sites outside the broad locations.

Whilst there was some opposition to the new area of GB at Nailsea/Backwell others were broadly supportive of the proposal.

There was considerable opposition to the release of Green Belt at Backwell citing that development at Yanley was more sustainable location being close to infrastructure and jobs. Opposition also focused of the benefits of maintaining the GB at Backwell for green space, recreation, wildlife, wellbeing and the character of the area. Traffic congestion and loss of high-quality agricultural land also featured strongly.

Opposition at Yanley centered on the impact on local villages, and whether this was the start of a larger development. Pressure on the A38 and A370, together with increased traffic as a result of airport expansion was expressed. Others questioned the sustainability of the site and whether this was overstated, the reality being a car - dependent suburb. There was concern about the recreational pressure on surrounding area. In terms of GB boundary some questioned whether the narrow tranche of GB between the settlement and Bristol was defensible, and if the boundary should be extended to include other areas.

At Portishead there was some opposition to moving the boundary to accommodate development, proximity to Weston Big Wood and traffic congestion. Inset villages received a mixed reaction with some Parish Council opposed to their village being inset, whilst others supported the proposal. Some respondents suggested a greater loosening to provide additional housing or other specific changes. Changes to the GB at the Port and Airport were requested by both the Port and Airport.

The most frequent suggested amendment included extending the GB to the AONB. Others focused on individual releases at specific locations. Nailsea Town Council for example suggested a release to the north of the town.

A recommendation for further Green Belt amendments to be made through neighbourhood plans was also made.

LP9: Strategic gaps

A total of 38 comments were received in relation to this policy. 37% objections, 53% support with amendments, 10% support.

Some of both the objecting and supporting comments included suggestions for new strategic gaps, including the following locations: Sandford/Churchill, Claverham/Cleeve, Clevedon/Kenn, Clevedon/Tickenham, Yanley area, around Elborough, west of Banwell and Bleadon/Weston-super-Mare.

There was some opposition to strategic gaps from developers/landowners seeking development of affected land, such as between Weston super Mare and Locking (Lanays Drove, and the Elm Grove nurseries area). There was related criticism of the justification for strategic gaps in the Council's background paper

There was some concern about proposed changes to strategic gaps, such as the boundary change at Hutton, and removal of the strategic gaps at Uphill and between Nailsea and Backwell.

There were some suggestions that the proposed Wolverhill strategic gap should be amended in extent.

LP10: Transport infrastructure allocations and safeguarding

A total of 80 comments were received in relation to this policy. 28 objections, 43 support with amendments, 9 support.

A number of respondents raised concern around the lack of detail on transport schemes associated with new growth areas, particularly at Nailsea and Backwell.

There was some support for prioritisation of active travel and public transport, although some concerns around the practical issues for the delivery of the transport hub at Nailsea station.

Comments on requirements or clarifications for specific schemes including J21 relief road, enhanced J21, and a connection between the M5 and Nailsea.

Concern around existing parts of the network including the A370, particularly around the Congresbury area, Portbury and Tickenham. Also concern around the Banwell Bypass project and associated growth proposals and the potential impact on nearby transport network and settlements.

LP11: Bristol Airport

A total of 38 comments were received in relation to this policy. 32% objections, 52% support with amendments, 16% support.

The objections to this policy largely related to the recent appeal decision and numerous concerns were raised about airport growth in general. There was request from Bristol Airport Limited to discuss the content of the policy further as it now needs to be re-framed in light of the appeal decision and to ensure that it is in accordance with national aviation policy. They also requested a discussion as to why a Supplementary Planning Document is needed and what its purpose would be.

Recurring themes within the comments were focused around the impacts the airport has on climate change, the local highway network, and other environmental issues such as pollution, impact on wildlife, health and wellbeing. Landscape and Green Belt impacts also featured heavily in the comments, as did the provision of public transport options.

Two thirds of the comments received were generally supportive, and in particular the proposal to produce a supplementary planning document was welcomed by many respondents. Other supportive comments welcomed airport growth because of the potential employment growth and local economic activity. A number of the comments referred to how effective monitoring and enforcement will be required to ensure that the policy is implemented robustly.

Some responses suggested specific amendments, and requests to discuss the detailed wording.

LP12: Air safety

A total of 5 comments were received in relation to this policy. 0 objections, 1 support with amendments, 4 support.

All of the comments received were support or support with amendments. There was a general comment about monitoring and enforcing activities at Bristol Airport and the flight path there.

LP13: Royal Portbury Dock

A total of 10 comments were received in relation to this policy. 1 objection, 2 support with amendments, 7 support.

The Bristol Port Company objected to the fact that land at Shipway Farm hasn't been removed from the Green Belt and allocated for future expansion of the Port. However, other respondents such as Natural England supported the fact that expansion of the Port into the Green Belt wasn't being proposed in the plan, particularly as this area is ecologically sensitive. Comments about the role of renewable energy were also made as well as about the infrastructure to and from the Port, particularly in relation to sustainable travel for employees.

LP14: Local Green Space

A total of 24 comments were received in relation to this policy. 3 objections, 9 Support with amendments, 12 support.

The only objection actually wanted the policy to be stricter, so was not opposing the policy in principle. However, a supporting comment wanted the policy to only apply to public open space, and not affect domestic gardens.

There were a number of supporting comments, some advocating additional areas be designated as Local Green Space (LGS) to those listed in Schedule 3 of the Plan. They included sites at Backwell and in the Abbots Leigh, Ham Green Pill and Easton-in-Gordano Neighbourhood Plan area, and Local Wildlife Sites. (Note that a number of further LGS sites are also suggested in comments on Schedule 3 which can be viewed in Appendix 4.)

There were comments supporting LGS regarding wildlife in particular, and one supporting protection of green space adjacent to ancient woodland.

LP15: Preferred Area for mineral working – land at Hyatts Wood Farm, south of Stancombe Quarry

A total of 5 comments were received in relation to this policy. 1 objection, 2 Support with amendments, 2 support.

The objection questioned how heritage assets had been taken into account, although the supporting comments also included expression of concerns, notably

about the impact of quarry traffic on local roads, and requests that consideration be given to water resources and planning conditions.

LP16: Area of Search for minerals working – land at Downside Farm, south of Freemans Quarry

A total of 5 comments were received in relation to this policy. 2 objections, 2 support with amendments, 1 support.

Concerns raised included the impact of quarry traffic on local roads, impact on an aquifer, need for consideration of after-use, possible need for review of conditions, and carbon footprint.

LP17: Minerals Safeguarding Area for carboniferous limestone

A total of 3 respondents commented on this policy, 1 objection, 1 supporting comment with amendments, and 1 supporting comment.

Concerns were raised about noise and traffic associated with quarrying operations. There was a view that the safeguarded area was too tightly drawn at Downside Farm.

In terms of DP7: Large scale renewable energy generation, some were very supportive of a dedicated policy supporting renewable energy generation. However, there were a range of comments received on the appropriateness of the Search Areas within designated sites, including the Mendip Hills AONB and SSSIs. Comment received that marine and tidal technology should be included.

For policy DP8: *Efficient use of land* there is dissatisfaction over the application of a fixed density standard and more recognition should be given for the wide variety of circumstances which will lead to differing densities and therefore non-compliance with these policies. Recognition should be given of the increased pressures which will be placed on open space, wildlife, infrastructure and services with the application of increased densities.

For policy DP9 *Flood Risk*, 23 comments were received, with more supporting than objecting. Issues raised included concerns for some proposed development locations, such as Backwell and Congresbury, regarding flooding, and particularly with climate change in future, having regard to historical flooding incidents.

There were some comments advocating change to the detailed wording, such as to accurately reflect national flood risk policy, and advocating nature-based solutions and green infrastructure. Other comments advocated use of the sequential approach and application of the policy to new transport infrastructure. However, some comments wished to ensure local circumstances are taken into account, such as being aware that sequential test requirements had been passed by previous proposals.

For policy DP10 *Sustainable drainage*, 14 comments were received, all supporting, but some issues were raised. They included concern that, because of the flood plain or high water table, some development proposals such as at Backwell, and the Banwell bypass, could make the policy's aims difficult.

Other comments included endorsement of use of SuDS guidelines, consideration of SuDS before other means of surface water disposal, and a suggested reference to protecting water quality in the policy.

For policy DP11: *Rivers, watercourses and springs*, 9 comments were received, all supporting. Issues raised included impact of insensitive management of watercourses for wildlife, and effect of climate change on water quality. There were suggestions for improving the situation, such as maintaining water levels throughout the year, and maintaining trees along watercourses.

For policy DP12: *Development in the Green Belt* some of the objections related to the changes proposed to the Green Belt rather than the policy itself which is concerned with development within the Green Belt. Some objection was raised to the clarification of the NPPF phase 'limited infilling in villages.' Others felt the policy was over complicated or not needed. Suggested amendments concerned renewable energy, community led schemes and affordable housing. The change of use from agriculture and equestrian facilities was seen as either inappropriate or needing clarification to deal with use once equestrian use was no longer required.

mixed use developments. However, there was overall support for this policy with 7 respondents feeling it provided the right level of protection for employment sites.

Policies DP21 and DP22 relating to visitor attractions and accommodation elicited a low level of response but were generally supported. While there was support for start-up green businesses the point was also raised about ensuring development would be compatible with nature protection and with the living conditions of existing residents. For retail policies DP23-DP28 there was generally a low level of response to these policies, but with a high level of support expressed to the policies as written. It was suggested that additional detail can be expressed in policy DP23 Town Centres about the Wyndham way area in Portishead and this can be picked up and incorporated following completion of placemaking work currently being undertaken there.

Policies DP29 and DP30 relating to control of non-mineral development, and mineral working exploration, extraction and processing, respectively, both elicited a low level of response. While there were some comments in support, and no actual objections to either policy, the comments on DP30 included strongly worded opposition to contemplation of fracking. The other issue raised for DP30 was a questioning of the policy's requirement for mineral working proposals to demonstrate the need for it. For Policy DP29 the only issue raised was a request that associated facilities (concrete plant, offices etc) in the north part of Stancombe quarry should be safeguarded, and that that could be under the policy, but it would be much easier to understand if the buffer zone and site boundaries were shown on the policies map.

Historic and Natural Environment (Policies DP31 – DP41)

A total of 206 comments were made regarding policies within the chapter with overall support for the policies which focus on the protection and enhancement of the natural and historic environment. Comments related mainly to the detailed wording of the policies and how they would be implemented.

For policy *DP31: Green Infrastructure*, a number of responses (23) were received. Various issues were raised, included the need for regard to the mitigation hierarchy, maximising carbon storage, and meeting recognised green infrastructure standards. Encouraging green infrastructure on development in or near the Mendip Hills AONB, to reduce pressure on it, was also advocated.

For policy *DP32: Nature Conservation* there were many responses (46). A number of issues were raised, including requests for stronger links with policy DP33 on biodiversity net gain, together with controls on development affecting designated sites and zones, like in the Bats SPD. There was concern that some development proposals would not meet the policy, like at Backwell and Yanley. Some comments advocated policy strengthening, to proactively help nature's recovery and give stronger protection of species or habitats of principal importance.

For policy *DP33: Biodiversity Net Gain* a significant response was received (28 responses) with more comments in support than objecting. Concerns included doubts that BNG can be achieved, and a view that BNG, including the metric, has been

Countryside (Policies DP53 – DP63)

A total of 87 comments were made regarding the 11 DP policies which relate to the countryside. Most of these related to the best and most versatile land (DP53) and recreational use in the countryside (DP57).

Most respondents to DP53 recognised the finite resource of BMV agricultural land and its value for local food production. Many comments related to the conservation and sustainable management of soils. An issue was raised regarding how the policy fits into the hierarchy of other policies in particular with regards to the allocation east of Backwell.

The issues raised to DP57 (recreation in the countryside) related to the inconsistency of the policy and the proposed allocations at Backwell rather than the policy itself.

Comments on the remaining policies were broadly supportive.

Delivery (Policy DP64)

This chapter contains policy *DP64: Infrastructure delivery and development contributions* and 18 comments were made in relation to this policy. The main issues raised were around the timing of infrastructure delivery and concerns that infrastructure such as required roads, school, doctors' surgeries and community facilities wouldn't be in place at the appropriate time to serve the new housing. Also concern that contributions towards infrastructure would not be enough to cover the cost of all the infrastructure needed. There were also comments on the Infrastructure Delivery Plan and what it should contain for the next stage of plan-making, particularly in relation to transport.

3. Town and Parish Council Summary of Responses

Abbots Leigh Parish Council (also see Easton-in-Gordano PC comments):

- Proposed 6 amendments to the settlement boundary to include various properties and pieces of land.
- We object to the proposals of Local Plan 2038 that there should be no development in our area. We believe that the current version of the Local Plan understates the contribution which our area can make. Despite our location in the Green Belt, sustainable development in Abbots Leigh, Pill and Easton-in-Gordano of up to 150 dwellings would contribute to meeting housing need and current shortfall, and is consistent with both the Vision and the Sustainability objectives. Half these dwellings would be within settlement boundaries, a quarter on sites adjacent to existing settlements and a quarter on sites elsewhere in the two parishes.
- The Old School Field in Abbots Leigh and Brookside in Pill fulfil important community functions and we recommend that both of these be considered for Local Green space status.
- Policy DP42: Affordable Housing - target of 40% is insufficient and fails to acknowledge that affordable housing can be delivered on smaller sites.
- We strongly welcome recognition of the possibility of community-led, affordable housing.
- DP34 - Justification were to mention the importance of the Bristol Woods Plan which provides the local context for the maintenance and management of woods which for Abbots Leigh with much woodland, is particularly relevant and important.
- Support the view that it is necessary to consider locations for development within the Green Belt. Some contribution to meeting housing needs from locations in the Green Belt is inevitable and even Abbots Leigh could make a small contribution. The two Parish Councils (Easton-in-Gordano/Pill and Abbots Leigh) propose up to 40 dwellings, largely affordable housing, in clusters immediately adjacent to existing settlements. Damage to the Green Belt would be limited. Abbots Leigh, Pill and Easton-in-Gordano do not contribute to the openness of the Green Belt and local development would not encroach on the extensive protected green spaces of the Green Belt.
- We recognise the importance of sufficient sites for employment. We welcome confirmation of the allocated land in Portishead at Gordano Gate. This policy should give more emphasis to the role of premises for smaller start-up business, local business hubs, working at home and to the important role of Royal Portbury Dock in generating employment opportunities.
- Its welcome that active travel (cycling, walking and safety) gets as much attention as infrastructure. The main Abbots Leigh concerns relate to the A 369 and to speed, safety, noise. It's unfortunate that there is no mention of pollution in this policy. It is also unfortunate that there is no mention of wheelchair users amongst the policies for transport.
- LP9: Strategic Gaps - the principle of maintaining gaps to separate distinct communities is valid in relation to Abbots Leigh, Pill and Easton. Failure to protect the gaps along the line of the A 369 at Blackmoor or Chapel Pill for example would lead to urban sprawl from Leigh Woods to the M5 Motorway.
- DP13: Highway Safety - The A 369 is continually vulnerable to overload and congestion, not only at peak hours. Further development along the A 369 would

create pollution and noise as well as affecting safety. Abbots Leigh, especially at stretches before and after the George Inn is a case in point.

- SP3 - Pill is an important local centre for Abbots Leigh. It is a significant, semi-urban local centre offering positive sustainability with active travel accessibility to local jobs and services, and public transport access to jobs in Portishead and Bristol.

Backwell Parish Council:

- The overwhelming majority of residents consider the Preferred Options proposals would be a disaster for Backwell. Responses in this consultation reflect our request that the proposed housing allocations are reconsidered. New development should be redistributed to some of the other locations that are much more sustainable and better matched to North Somerset Council policies.
- Proposed allocations are of an excessive scale – disproportionate to the size of the village resulting in a 60% increase.
- Inconsistent treatment of Backwell in the Local Plan. In some policies/documents it is referred to as a village and in others as an urban area combined with Nailsea. There is also inconsistency regarding potential employment allocation at Nailsea/Backwell and its future location.
- No evidence to justify removing land from the Green Belt east of Backwell – the plan needs to consider urban locations first in line with the spatial strategy such as Clevedon, Portishead, Ashton Vale, Pill or north Nailsea.
- The loss of Grade 1 agricultural land at Backwell would be significant.
- Removal of land from the Green Belt could lead to urban sprawl between Backwell and Flax Bourton.
- Transport solutions and proposals are very vague and general. No specific deliverable schemes are set out.
- The importance of Backwell railway station is grossly exaggerated. The station is currently inadequate (poor access, short platforms, plans for electrification, overcrowding and significant numbers of fast trains passing through (making any increase in services difficult/impossible). Therefore, new residents will be driving to work increasing traffic on the A370 including the A370 cross-road and station road which your document states should not be made even worse than they are now.
- The document does not describe where the new primary school would be in Backwell in relation to our existing schools. There are many complex issues about changing secondary school provision and this is not detailed adequately.
- Impact on wildlife will be significant for example the Special Area of Conservation and Sites of Special Scientific Interest for our Horseshoe Bats which are known to use the fields in Grove Farm as a major foraging area for the maternity colony present in Brockley.

Banwell Parish Council:

- How will the local community need at villages be determined?
- A specific need in Banwell to extend the proposed Strategic Gap to include two fields close to the village to preserve the historic setting of the village and provide sports pitches.
- The Green Belt is inhibiting the natural growth of Bristol putting development pressure on villages in the south of the district
- How will the cumulative impacts of development on the landscape character be assessed and by whom?
- Welcome the need for Community Engagement Statements from developers.

Brockley Parish Council:

- Brockley is not directly affected by the housing plans for Backwell and Nailsea but will be indirectly affected by substantial increase in population in the immediate area and will bear a considerable increase in traffic on narrow country lanes which are already very busy.
- There are no exceptional circumstances for the removal of Green Belt status East of Backwell, there is only the proposal to build 500 houses there, so increasing the size of Backwell by a large amount.
- The proposed new Green Belt is not like for like as much of the land being proposed for Green Belt status is unsuitable for building anyway. The effect of declassifying the land East of Backwell will be to encourage creeping development between Backwell and Flax Bourton in the future.
- As it is known that greater horseshoe bats, resident in the SSSI maternity roost in Brockley, regularly feed in the area of Grove Farm, Backwell, it is hard to see how building 600 houses there can be consistent with protecting their foraging habitat. Mitigation involving land elsewhere is unlikely to work as the bats will be programmed to feed at Grove Farm.

Burrington Parish Council:

- Concern over impact on services, facilities and road network of the proposed housing allocations in Langford.
- There is a need for confidence that the new local plan will achieve a continuing five-year supply of developable housing land to ensure that local planning policies will be effective in influencing the location and quality of new development in the future.
- Objection to one of the Active Travel Routes (Congresbury/Churchill/Wrington/Burrington/Blagdon – route of former railway path avoiding B3133/A368) proposed in DP15 as it is felt that it is not deliverable.
- Lack of detail about transport proposals.

Butcombe Parish Council:

- Opposed to any removal of the Green Belt at Bristol Airport because any further development, for instance warehouses or offices etc, would compromise the rural openness of the local Green Belt. However, we welcome the proposal to prepare an SPD for the airport. We would like the SPD to include airport parking issues.
- Would like to see a specific reference in the policy to any further development at Bristol Airport being considered within the context of carbon budgets.
- Cannot comment on the Mass Transit proposal for Bristol City Council to Bristol Airport without further detail – needs further community consultation.

Churchill Parish Council

- The Draft Local Plan presents a real opportunity for positive change to strategic planning and has the potential to remove the constant barrage of speculative, unplanned, inappropriate, planning applications in unsustainable locations.
- Supports the prioritisation of 'active travel and effective public transport over car use wherever possible' but in rural areas safety is an issue.
- Strongly support SP3 particularly "The amount of development at villages and in the countryside will relate to local community needs". It would like to see some more specific wording on how those 'community needs' will be assessed and what

is the definition of 'local'. Developers recently have referred to 'local' as meaning North Somerset as a whole.

- The recent addition of over 300 new houses in Churchill has increased the size of the village by approx. 33%. Unplanned, speculative housing development applications total a further 218 houses put forward by developers who maintain that there is a 'need' in the village. A further 257 allocated in the Draft Local Plan will leave current infrastructure such as schools and GP surgeries at breaking point. Patients are already being offered appointments in non-local surgeries and local children are unable to get places at Churchill Academy and Churchill Primary and are attending schools further afield in other towns and villages. This is contrary to policy SP2, SP4, SP6 and Sustainable development objectives.
- CPC appreciates that villages need to grow, but they need to do so at a sustainable rate with the relevant infrastructure in place to support any further growth to avoid the creation of soulless, car dependant, dormitory communities.
- Place-making should occur in collaboration with local communities.
- SP6 – strongly supports strengthening village settlement boundaries and the first 5 bullet points of this policy. However, the bullet points and clauses referring to new development 'Outside settlement boundaries' and the 4 bullet points that follow, considerably weaken this policy and offer opportunities for developers to further submit inappropriate, unplanned speculative housing developments that will be difficult to refuse.
- The PC recognises the need for an SEMH school in North Somerset but feels very strongly that the site currently allocated to this is not appropriate as access to the site is narrow and congested and proposed development will make this worse, plus the field the school is proposed to be built on is a valued local facility for its tranquillity and biodiversity. The school would be better located in the Wolverhill strategic development location.
- Fully support the proposed changes to the Green Belt as a sustainable location for new strategic development due to its proximity to Bristol. Would like to see the loss of Green Belt replaced with an increased area to bring it up to the Mendip Hills AONB which will afford additional protection to this invaluable asset.
- Small pockets of Green Belt land within 10 minutes walking/cycling of train stations should be released to make up the housing shortfall.
- Do not support the building of new roads which only serve to increase car use, carbon emissions and disincentivises the use of sustainable public transport. Lack of detail to improve public transport throughout North Somerset within the plan.
- Disappointed that Churchill Sports Centre is not included in Schedule 4 and this is a regrettable omission in the light of the current and proposed development allocated to our villages.
- CPC asks that the gap between Sandford and Churchill be included in these identified as a new strategic gap.
- CPC remains opposed to the Banwell Bypass scheme on the basis that the impacts on neighbouring villages has been poorly addressed and the proposals to mitigate increased traffic are inadequate. A number of comments seeking clarification on specific highways schemes.
- CPC remains opposed to any further expansion of Bristol Airport on the grounds of climate change, increased traffic congestion and pollution.
- DP8 – densities in rural areas should be lower than 40dph.
- Priority for affordable housing in rural areas needs to be given to local people with a strong connection to the villages where their support network is in place, or to

key workers working locally. Currently local young people and those wishing to downsize need to leave the villages to find affordable/appropriate housing. This policy needs to be reviewed pertaining to rural areas.

- The allocations for Churchill Parish make no mention of the above infrastructure needed to support the additional houses. Both Churchill Primary and Academy are full. The Site Requirements make no mention of contributions to enable the Parish Council to build a new village hall to meet the needs of the expanding population or contribute to the opening of Churchill Sports Centre.
- Support SP2, SP3, SP7, SP9, DP1, DP2, DP3, DP4, DP6, DP7, DP10, DP11, DP15, DP17, DP18, DP34, DP35

Cleeve Parish Council

- CPC welcome the strategic policy SP2 on climate change. Our view is that any further development at Bristol Airport should be looked at within the context of carbon budgets.
- CPC are unable to comment on the Mass Transit as no details of the alignment have been given between Bristol City Centre and Bristol Airport. No other details of the Mass Transit are given: is it to be light rail, bus or tram? No details of mitigation have been given for the Mass transit which will be through Green Belt land.
- CPC request that there is no removal of the Green Belt inset and that any further development should not compromise the openness of the Green Belt, for example the building of warehouses.
- CPC expect that Policy LP11: Bristol Airport will be reviewed in light of the Bristol Airport Action Network High Court challenge to the Inquiry decision made by the planning inspectorate February 2022.
- CPC welcome the preparation of a Supplementary Planning Document on Bristol Airport.
- CPC note that the decision report to the Public Inquiry states that climate change, highway matters, air quality, as well as character and appearance (and the AONB), and biodiversity were considered to be neutral in the planning balance as no material harm was found. We recommend that on all environmental issues the words in the local plan should be strengthened and that any material harm to environmental issues should carry substantial weight in light of the climate and biodiversity crisis.
- CPC request that other park-and-ride schemes are considered and that the priority shown in Policy DP19 is removed for further car parking in the Bristol Airport Green Belt inset. Any further use of Green Belt land at the Airport will be viewed from the Mendip Hills AONB and impact on the Greater and Lesser Horseshoe Bats.

Congresbury Parish Council

- Congresbury Parish Council strongly supports the commitment in SP3 that 'The amount of development at villages and in the countryside will relate to local community needs.'
- Congresbury Parish Council rejects this site proposed called Pineapple Farm for possible housing as it's against the wishes of the village and goes against many of the proposed policies within the new local plan. Congresbury Parish Council expects the immediate removal of this land from the local plan.
- The proposed allocation at Woodhill Nurseries should be part of wider strategic growth within this part of Congresbury. The parish council would also have

- concerns about road access and safety due to the narrow Wood Hill Road. This would need to be assessed with a wider proposed growth of this area
- Congresbury Parish Council understands that there should be some growth in the village through to 2038, however this growth needs to be sustainable, supported by good infrastructure and where this is related community desire and need.
 - Areas for new housing development that the parish council suggests are along the A370 in a westerly direction and the area north of Cadbury Garden Centre if combined with improvements to the road infrastructure in this area.
 - SP6 – welcome strengthening settlement boundaries but in terms of the section on development outside the settlement boundary, we would want to see the alteration or removal of the phrase 'suitable alternative sites are not available within settlement boundaries'. This is a perfect clause to allow speculative planning applications.
 - LP10 - disappointing there is no mention of improvements to the A370 and the need to upgrade the strategic junctions in Congresbury with the B3133 Brinsea Road and B3133 Smallway. Both junctions are at capacity and without further development pose a substantial risk to Congresbury and the development of North Somerset.

Easton-in-Gordano Parish Council (also see Abbots Leigh PC comments)

- We believe that the current version of the Local Plan understates the contribution which our area can make. Despite our location in the Green Belt, sustainable development in Abbots Leigh, Pill and Easton-in-Gordano of up to 150 dwellings would contribute to meeting housing need and current shortfall, and is consistent with both the Vision and the Sustainability objectives. Half these dwellings would be within settlement boundaries, a quarter on sites adjacent to existing settlements and a quarter on sites elsewhere in the two parishes.
- Pill and Easton-in-Gordano Parish Council welcomes the proposed extended boundary including Cross lanes and Ham Green (former hospital land). In relation to Settlement Boundaries, current NSC Core Strategy (CS 32) states that 'there is scope for these to be reviewed and adjusted via Local Plans or Neighbourhood Development Plans'. We recommend that this wording should be restated in the new local plan and, in the context of the housing growth proposed (see SP 8) we would review and if appropriate recommend adjusted boundaries in an updated Abbots Leigh, Pill and Easton Neighbourhood Plan soon after Local Plan 2038 has been formally adopted.
- Policy DP42: Affordable Housing - target of 40% is insufficient and fails to acknowledge that affordable housing can be delivered on smaller sites.
- Pill and Easton-in-Gordano is neither a major urban area nor a typical village. It is a significant settlement – a designated 'local centre' and an important hub for both the immediate and the surrounding area. It is a Category A Village 'considered to be relatively sustainable in its own right with a range of services and facilities which can be accessed by walking and cycling (Supporting Documents Rural Settlements Para 3.4). Nevertheless it has been excluded from full assessment under Stage 5 of the Spatial Strategy because of its Green Belt status.
- Pill is a significant, semi-urban local centre offering positive sustainability with active travel accessibility to local jobs and services, and public transport access to jobs in Portishead and Bristol.
- There is significant cycling to Royal Portbury Dock and we strongly support the aim to 'improve connectivity and perceived safety of routes for employees'.

- We welcome the improvements promised for Easton-in-Gordano, especially the routes to St. Katherine's School.
- Cycle lanes should be clearly separated from pedestrians and traffic, be comprehensive and well maintained and ideally have one each side of the carriageway. None of this is true of the current provision even the relatively new stretch from Abbots Leigh to Pill is shared with pedestrians. Where cycle lanes are ill maintained (A 369 with poorly maintained with gravel, rubbish and vegetation encroaching on path) there is an incentive to use the road rather than the cycle path. It is also even worse from Abbots Leigh onwards towards the turn to the Clifton Suspension Bridge. The cycle lane along the Avon from Ham Green to Bristol is very poorly maintained with potholes, mud and uneven surfaces making it impossible to use for commuting particularly during Winter months. It needs proper, ongoing maintenance to make it viable as anything other than a leisure facility.
- SP4: Place-making: In addition to addressing the needs of new communities there must be recognition of the needs of existing communities. The majority of North Somerset households live in neighbourhoods which have developed over many years, and it is important that the refurbishment, revitalisation and management of older centres are fully supported.
- Across North Somerset there are many larger houses either vacant or under occupied as the owners' children have left releasing significant unused accommodation. Many owners of larger dwellings have expressed the wish to downsize to single storey bungalows and it is essential both that steps are taken to ensure vacant homes can be occupied and that sufficient smaller sized houses are available in places they are needed.
- DP46: Homes for all - welcome support for community-led housing bringing community cohesion, permanent affordability and sustainable development. Also support for the policy that ensures a range and supply of residential accommodation for people with specialist and vulnerable needs.
- DP7: Large scale renewable energy - Some areas around the Royal Portbury Dock estate that are identified as suitable only for wind turbines below 250kW would in fact be suitable for significantly larger turbines.
- DP25: Local Centres - The proposals to enhance the amenity and accessibility of the Pill Precinct are a good example of the ways in which centres in existing communities can be improved.
- DP49: Healthy Places - We are particularly aware of the levels of deprivation in Pill and Easton in Gordano and of the levels of health inequalities that exist. There needs to be explicit reference to the NS Health & Wellbeing Strategy 2021-24 and its concept of "Thriving Communities". There must be read-across from this strategy to the Local Plan 38 so that they inform and build on each other.

Flax Bourton Parish Council

- Support much of the aims and aspirations of the draft Local Plan particularly the promotion of public transport as an alternative to cars.
- However, the draft Local Plan's concentration of preferred development in WSM, Banwell, Nailsea and Backwell (the west of the plan area) will bring increased traffic through Flax Bourton severely affecting the health and well-being of our residents. Unless alternatives to car commuting can be delivered and are sustainable combined with suitable mitigation measures through Flax Bourton, we cannot support the proposed preferred development sites and therefore the draft Local Plan.

- No confidence that the way in which values for each SA objective were assigned to each area under consideration were consistent and no explanation was given as to how they were weighted. There was an assumption in the SA of a “modal shift in transport” but no explanation was given of how this would be achieved and given the situation this seems unlikely. More likely would be a substantial increase in traffic on the A370, especially at rush hours. North Somerset Council should already be aware of the concerns of Flax Bourton residents with regards to the dangerous and difficult conditions for pedestrians within our village and of the Parish Council's attempts to ameliorate the situation.
- Sites to the north of Nailsea should be developed rather than those distant from the town centre to the southwest of Nailsea and in the east of Backwell.
- Question why no Green Belt has been identified for development (other than a minimal amount) around the North of Nailsea, Portishead, Pill and Ham Green all of which are better located for urban services and proximity to transport (Portishead railway and a designated rapid bus service route) and employment in Bristol, Aztec West and at Portbury Docks.
- Strongly challenge the inconsistent and subjective reassessment of the openness of the rural villages which has resulted in Flax Bourton being inset from the Green Belt. Therefore, object to LP8.
- We are disappointed to conclude from the limited transport evidence available for consultation that there is not a deliverable or sustainable public transport offering to shift transport along the A370 from cars to active travel and public transport.
- LP2 - Urban density of housing rather than rural density should be built in locations closer to the edge of Bristol.
- LP3 - The selection of Nailsea and Backwell does not comply with draft policy SP3. Active travel will have limited use outside the immediate area and commuter traffic will continue and increase with the housing numbers at this location and additionally from WSM and Banwell due to the unavoidable truth that Bristol is the main employment area with over 23,000 residents working in Bristol of which 84% travel by car. The only realistic option is for rail or rapid bus transport. This further requires car or bus access to Nailsea Station which must become an effective Transport Hub. These options are not deliverable without increased train services and an improved road link for buses to travel rapidly to Bristol. The only proposal in the draft Local Plan is an un-costed and probably unaffordable road crossing of the railway which will then create greater quantities of traffic being delivered to Flax Bourton creating a bigger choke point on the A370. The selection of LP3 has been made due to its proximity to Nailsea Station which requires significant infrastructure investment before it can become an effective Transport Hub.
- LP10 - This policy refers to infrastructure which has not been identified other than in very broad terms and refers to mitigations in JLTP4 which have still not been detailed and consulted upon. We can only conclude that the transport infrastructure and mitigation measures have not been properly identified, costed or feasibility tested.
- Support DP13.

Hutton Parish Council

- It is crucial to maintain a strategic gap between Hutton and Weston to maintain the character of the village. Changes to the gap at the Grange Farm site beyond the brownfield site reduces the effectiveness of the strategic gap. This was fully supported in our village consultations in 2004 and 2019.

- There are no safe walking or safe cycling routes between Hutton and Weston. We would support any improvement on this situation particularly along Oldmixon Road and establishment of the proposed cycle and walking route via Moor Lane, Hutton across the Weston Airfield site to connect with extensive network already in existence. Residents have indicated that it is critical to continue with a regular bus service to prevent further increase in car use.
- Hutton Parish Council fully supports North Somerset Council's policy on climate change and declaration of a Climate Emergency. Critical to this is the promotion of Active Travel, safe walking, safe cycling and public transport to reduce the use of private vehicles.
- Changes to the settlement boundary at the Grange Farm site extend beyond the brownfield site. Extension of the settlement boundary beyond the brownfield site would not be supported by the Parish Council. Development of the Grange Farm site offers opportunities for improvements to Active Travel to encourage safe walking and safe cycling to Broadoak School to support NSC commitment to climate change and environmental issues.

Kewstoke Parish Council

- There are two changes of concern to the proposal for amendment to the settlement boundary for Kewstoke, as defined by the village fence. The first is the paddock to the east of 'Karibu' The proposal to take this into the settlement boundary is very disappointing as there is a history of many reported breaches of planning at the site, as well as many hours spent by the Parish Council responding to and monitoring these breaches, in particular the use of agricultural land for residential purposes.
- The second is the proposal to take agricultural land and buildings to the east of the 'Hideaway' Crookes Lane into the settlement boundary. The Parish Council strongly objects as there has only been a very recent attempt to use the land for residential purposes and noting there are several ongoing enforcement investigations.
- The Parish Council concedes that several holiday caravan parks are now, through unlawful use, regarded as residential, making a case for them to be brought into the Kewstoke Village Settlement boundary.
- To try and integrate the housing plan with both transport and employment, particularly in the Banwell/Wolvershill Rd Area is going to be very difficult to achieve. Even assuming that the new inhabitants of the proposed housing are employed locally in the new industrial Area Junction 21 Enterprise Park, access will still be required by commercial transport and delivery companies. This will put further strain on the already stretched Junction 21. In reality a large percentage of the inhabitants living in the proposed "Wolvershill Road area" will still be commuting daily north to Bristol and further afield. A combination of both of the above will result in severe congestion in and around Weston and in particular Worle.
- A better solution may be to build housing closer to the current areas of employment rather than attempt to create a new area of employment in Weston super Mare.

Locking Parish Council

- Elm Grove Nurseries proposed site allocation - Locking Parish Council would consider building on the brownfield site only (where existing buildings are currently situated) to provide retirement bungalows 1-2 bedrooms provided by Housing

Association - social housing for elderly only – there is a very strong need for good quality social housing for the elderly particularly in Locking and WSM. It would not support building on the field that had been used for horticultural/agricultural needs and would not accept 50 houses on this site.

- Locking Parish Council objects to extending the settlement boundary at Wayside to include the curtilage of this property – the land is a small narrow strip with no value and cannot see the benefit of moving the settlement boundary.
- Why has the primary school site been included within the village settlement boundary? In the future should the Primary School site come up for redevelopment Locking Parish Council request that it be recorded that they would be given, in the first instance, the option to retain the site for community facilities.

Long Ashton Parish Council

- Concern that the proposal to build 2,500 houses in the Green Belt on the proposed site centred on the Woodspring Golf Course and inside the SBL at Lime Kiln Roundabout will become the first resort for development not, as it should be, the last resort.
- Building on Green Belt is contrary to climate emergency objectives and goals.
- Concern over impact of proposed new development on wildlife corridors.
- Concern over impact on ecosystems of increased recreational use.
- Loss of green space for people to use for exercise and mental health benefits.
- Loss of this area of Green Belt will result in sprawl from south west Bristol to Wild Country Lane.
- These developments could become the first step in a massive development that will merge Dundry, Barrow Gurney and Long Ashton with Bristol. For this reason alone development within the Green Belt must not be included in the local plan.
- The Council needs to challenge the algorithm that generated such a high and unsustainable target for development - even join with other councils experiencing the same problems.
- Make greater use of sites outside the Green Belt including the garden villages proposed in earlier plans, low-lying areas (not flood plains), brownfield sites, and consider the scope for development in those villages where it would make local facilities more viable.
- Recognise the changes in work patterns that have been accelerated by the internet and those that can work from home do work from home as much as possible and look for facilities close to home.
- Consider radical alternatives such as forming your own development company, in preference to working with the big building companies who have completely lost the trust of local people.

Nailsea Town Council

- The planned location for development on land south of Nailsea is unsustainable with poor infrastructure including road, public transport and facilities for example leisure and sports provision. The locations are set away from the existing town centre and will disproportionately impact on the residents of the town by placing pressure on the existing highway network and facilities. This land is also considered important, attractive and both agriculturally and environmentally significant, particularly in terms of bat habitats.
- Unclear in both policy SP9 and LP3 where the 8.1 hectares of proposed employment land is likely to be for Nailsea and Backwell. Development of the land

to the North of Nailsea will create opportunity to enhance the Southfield Road industrial estate and enable the redevelopment of Coates Yard, providing more sustainable jobs for the town.

- Further development of Nailsea can only realistically be considered with the introduction of additional highways infrastructure. Lack of detail about what this will be. Investment is also needed in the bus services and train station to make them affordable, reliable and attractive options.
- Land to the North East of Nailsea within the Parish of Wraxall is better suited for taking out of the Green Belt and will allow for more sustainable development to take place in a location closer to the town's amenities including jobs, schools and retail. We strongly urge North Somerset Council to re-consider this sustainable location.
- Supportive of the extension to the Green Belt to the south of Nailsea to prevent the merger of Nailsea and Backwell and any further encroachment into the countryside.
- Concern about the reference to Nailsea and Backwell continually throughout the Local Plan. These two locations have completely separate identities which must be protected. Each settlement has its own distinct issues which require solutions.
- North Somerset Council needs to lead the way with its commitment to support zero-carbon development and local policy must insist that any new development adopts the highest possible principles of low carbon or even carbon neutral development.
- Within schedule 4 there is no provision/location whatsoever for a new primary, secondary and special educational needs school within Nailsea, nor is there any provision for additional leisure facilities which are very much needed in the town and are referred to in policy LP3.
- Policy DP15: Active Travel Routes: Festival Way linking Bristol to Nailsea is further extended to the West of Millennium Park towards Clevedon and then on towards Weston-super-Mare in line with the plans being developed by Sustrans. The drove road running between Nailsea and Clevedon should be opened to the public to provide safe off road access between the two towns for both pedestrians and walkers.
- Nailsea Town Council is supportive of the policy to ensure that no more than 20% of proposed major development schemes in the town are for dwellings of four or more bedrooms.

Portishead Town Council

- Object to development south of Clevedon Road as it's in the Green Belt. There is also an ancient woodland near to the site "Weston Big Wood" and the location is within the Gordano Valley.
- Object to any development in the Green Belt.
- Welcomes the increase to 40% in affordable housing in sites of 10+ dwellings.
- Insufficient transport links to new employment areas in Weston-super-Mare.
- Improved active travel and public transport access is promoted throughout the plan but this is not supported by recent cuts to services. Better transport links should be provided to Portishead given the topography. More electric charging points required for cars and bicycles in Portishead.
- Increase in strategic gaps. There are many more important strategic gaps in North Somerset, which should be included.

- Concerned about proposals to release land from Green Belt protection. In particular, development of Woodspring Golf Course will mean the creep of Bristol suburbia further into the countryside.
- Changes to village settlement boundaries should not be made to include land that has acquired residential use as a result of a lack of enforcement. This would set an unhelpful precedent encouraging further creep of residential boundaries into the open countryside.
- Why is there no specific mention of protecting the Green Belt in policies SP1 and the Strategic Priorities?

Winscombe and Sandford Parish Council:

- Proposed housing allocations – Land at Mead Farm, Sandford, Land west of Sandford and West of Hill Road: The Parish Council would have liked more information on this site allocation, as none had been received. This site is unacceptable, due to be too far from the current Settlement Boundary.
- Winscombe and Sandford Parish Council has concerns over lack of infrastructure and local services being taken into consideration.

Wrington Parish Council

- Support vision, strategic priorities and the majority of the policies in the plan
- The new allocation of Green Belt afforded to Backwell/Nailsea would appear not to be equivalent to that area lost from the north east of the district. Can it not be an area equivalent to that lost which is re-allocated to other parts of the district?
- The parish council supports the proposed insets of villages in the Green Belt and is also pleased to note that "Boundaries of villages are not being adjusted to include new green field development sites, this is incompatible with the spatial strategy."
- DP33 - 10% Net Gain is not a challenging target and a higher percentage should be demanded if we are to enhance significantly the bio-diversity levels within North Somerset. Failure to meet that increased level should also be grounds for refusal. A figure of nearer 20% should be achievable and demonstrable with some meaningful application by any developer.
- SP3 - welcome the proposal that development in the villages and countryside should be related to local community needs. More community involvement is always welcomed.
- DP19 - We would question whether the restrictions proposed are robust enough to overcome a repetition of what has happened before. The conditions are too easily challenged by use of the phrase 'very exceptional circumstances'. The robust application of the Airport Surface Access Strategy is vital in containing the avid demand and subsequent permissions which have hitherto allowed the acquisition of Green Belt land for car parking by the airport. This has to cease.
- Settlement Boundaries have been reviewed across North Somerset and Wrington's Settlement Boundary is to remain unchanged. A new Settlement Boundary is to be drawn around the settlement of Redhill and the settlement made an inset within the Green Belt. – Happy to support those proposals.
- General comments on the unsuitability of the SHLAA sites.
- SP10: Transport - Suggest that the provision of electric car charging points be included in provision of car parks or 'on street' charging points such as are available in London with, for example, 1 hour free parking available at the charging point.

- DP53 - Development on sites on lower value graded agricultural/greenfield land should also be subject to an appraisal of potential damage to biodiversity in situ prior to development being approved. Preservation and enhancement of biodiversity and land character is at the heart of NSC's policies and strategies.
- SP6 - It is suggested that the bullet points relating to outside settlement boundaries be amended to include sites adjacent to existing settlement boundaries which would afford added protection to landscape and amenity and deter speculative development applications.
- DP37 - Should the AONB also be protected from over-flying by commercial aircraft using Bristol Airport in order to prevent disturbance and pollution being inflicted on local wildlife and tranquillity enjoyed by residents within the AONB?
- Suggested amended wording to LP11: Bristol Airport.
- Would like to add the following five sites to the list of Local Green Spaces in Wrington Parish:
 - Wrington Village Green, High St - 0.03ha.
 - Recreation Ground, Silver Street - 1.9 ha.
 - Old Surgery Green, Station Rd - 0.03ha.
 - Mike Bush Paddock, Wrington Hill - 0.16ha
 - Redhill Playing Field, Church Road, Redhill - 0.44ha.

Yatton Parish Council

- Broadly supports the Local Plan 2038 but would like to see more emphasis on dealing robustly with planning proposals for developments outside settlement boundaries. We would therefore like to be reassured that there will be robust adherence to, and enforcement of, the requirement in Strategic Policy 6 (Villages and Rural Areas) for developments outside settlement boundaries to be of an appropriate scale and design and without adverse effects on the landscape or character of the area. In our view, this clause would have precluded both the Moor Road and Rectory Farm proposals from even being considered and would have set much higher barriers for other developments which have already taken place around our village.

4. Next Steps

The subject of this report is the response received to the Local Plan 2038 Preferred Options consultation. This consultation was a second stage in the Local Plan Regulation 18 consultation process. It followed the Challenges and Choices Consultations which took place in 2020. The next stage is the pre-submission document which is currently timetabled for the end of 2022.

The pre-submission stage (Regulation 19) is the consultation on the Council's final version of the plan that is intended to be submitted to the Planning Inspectorate for examination. At pre-submission stage the consultation focuses on whether the plan complies with relevant legal requirements. Consultation is for six weeks and the responses received to the pre-submission stage are submitted to the Inspector to consider as part of the examination process.

The response to the Preferred Options consultation and an assessment of any new evidence will enable the formulation of a pre-submission document. The responses received to the Preferred Options consultation have been very useful in highlighting key issues that will need to be addressed moving forward with the Local Plan.

For the next stage in the plan-making process we will be producing a report showing what changes have been made to the policies and why. These changes will be informed by comments received through this consultation and further information that may emerge through the evidence base.

One of the issues raised in this consultation was concern regarding the lack of evidence to support the proposed policies, particularly in relation to transport, infrastructure delivery and viability. As part of the next stage of plan-making further evidence will be produced to support the policies including an Infrastructure Delivery Plan, a full plan viability assessment, the next stage in the transport assessments, a Habitat Regulations Assessment, an updated Sustainability Appraisal and a number of other background papers.