

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

Consultation Statement

Appendix 2: Summary of Responses to the Locational Policies

August 2022





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This appendix provides an overall summary of responses to the Locational Policies to indicate the range of issues raised. Detailed responses from individuals or organisations can be viewed on the online consultation page either against each policy within the <u>document</u> or for each <u>respondent</u>.



Policy LP1: Wolvershill Strategic Site (north of Banwell)

A total of 47 comments were received against this policy. 21% objections, 51% support with amendments, 28% support. Themes and issues which were raised were as follows:

Reasons for objecting:

Principle

- Should be locating homes close to Bristol where jobs are. Multiple comments questioned whether more appropriate to locate new housing closer to Bristol.
- Concern over creation of a housing estate without the necessary facilities/ uses to support a sustainable community.
- Transport network cannot cope with additional development and there is a lack of employment opportunity. Includes concern over network impacts generally, but also specifically J21 and the Strategic Road Network (SRN).
- Support aspiration however concern that the Wolvershill development will be car based due to isolated location. Requires investment in walking and cycling infrastructure in order for vision to be realized. By closing Wolvershill Road, will trips be diverted through NS link road?
- Concern that Banwell Bypass won't facilitate the proposed residential development.
- Conflict with SP6
- Conflicts with 2 objectives of SP1
- Does not align with SP10
- Does not align with LP6
- Great dispersal of housing supply is required with some medium sized housing and employment sites on the edges of larger villages. General comment (not always objection) around the risk of directing too much housing supply to large-scale strategic sites, the complexity and timescales of delivery.
- Support aspiration however concern that the Wolvershill development will be car based due to isolated location. Requires investment in walking and cycling infrastructure in order for vision to be realized. By closing Wolvershill Road, will trips be diverted through NS link road?

Scale and impact

- Concern on tall houses (3-4 storeys) as at Hayward Village, not respecting the local contact and village character. Some comments concerned over potential impact on character of area and nearby villages. Development requires a sympathetic approach to the nearby villages and other smaller settlements.
- Many development opportunities within bypass without building over countryside.
- Various concerns on the specific number of homes planned, further details below. In summary comments ranging from too much development, to capacity should be a maximum, to capacity should be a minimum.

Traffic

• Objection to the closure of Wolvershill Road to through traffic as will cause long detour when travelling from Worle and will cut Banwell off. Treatment of Wolvershill



Road was a key issue raised through the consultation in particular the impacts of this intervention. However support for the principle of active travel and high quality placemaking which drives the rationale for the potential closure so this highlights a key issue to address.

- 2500 homes will add to congestion and there is no provision for the J21 relief road. This would help congestion issues.
- Adverse impact on road network that is already under pressure, including J21. Jobs will be in Bristol so contribute to commuting and emissions.
- Existing public transport network is not oriented to facilitate access to Bristol.
- Objection to Banwell bypass project.
- Wolvershill will effectively be a commuter estate.
- Range of traffic impacts not fully assessed in the material provided so far.

Reasons for support:

- Support creation of a Strategic Gap between Banwell and the new development. Suggest gap is expanded eastwards and cold accommodate allotments and other community uses.
- Support closing Wolvershill Rd to through traffic from Banwell to the bypass.
- Support the creation of more cycle links to surrounding settlements.
- Support the recognition of the need for the development to deliver ecological, habitat and environmental enhancement, particularly in relation to horseshoe bats
- Support the proposal for a North Somerset Nature Park to provide bat mitigation, provision of land for biodiversity and habitat enhancement. Linked comment on the importance of HRA process in investigating the issues in relation to impacts on species and habitats.
- support the proposal for green infrastructure to form an interconnected network throughout the development, including additional woodland and tree planting surrounding and throughout the development.
- This is sensible use of the land given it is poor agricultural value. The location is close to Worle railway station and has long been earmarked for development.
- support the development of this location, which is able to meet many of the sustainable development criteria given its proximity to the Weston-super-Mare urban area and transport links.
- Support proposals assuming range of policy criteria are met.

Suggested amendments:

Site area

• Seek to increase footprint to assist delivery of housing shortfall.

Transport

- Wolvershill Rd should be maintained and improved as a through route to Churchlands Way. Closing this puts more traffic onto Riverside and Nye Road.
- Wolvershill Rd requires calming at present fast and noisy road.

Policy wording

• In addition to infrastructure, residential should be phased with delivery of employment.



- Reference to "up to around 2800" units is not fit for purpose and implies a maximum.
- Suggested policy changes: "A new mixed use strategic growth location is proposed at Wolvershill (north of Banwell) at the broad location defined on the Policies Map to accommodate up to around <u>at least</u> 2,800 dwellings, including 980 affordable homes <u>policy compliant provision of affordable housing</u>, around 11 <u>6.5</u> ha of employment land, a mixed use local centre and at least three 420-place <u>two number two-form</u> entry primary schools.".
- Note also comments received that the dwelling capacity should be a maximum.
- National Highways suggests amending the green infrastructure bullet from "tree planting along the M5 edge" to "tree planting adjacent to the National Highways estate (M5)." National Highways will wish to review and fully understand such proposals as they come forward.
- The use of 'complement' with respect to the scale and range of facilities in Banwell in the first bullet point and the justification is perhaps not appropriate. Clarification of what is actually intended would be useful.

- The site is in close proximity to the AONB and SSSI/Horseshoe bats SAC. Mitigation for such should be coordinated with the Banwell Bypass and these issues should be addressed through the HRA process. The proposed Strategic Gap could have an ecological/ environmental role in relation to bats and the nature park and this should be the focus of the HRA (Natural England summary)
- Based upon a constraints-led approach, highly likely that the site can accommodate in excess of 2800 units.
- Query whether scale of affordable provision is in line with the AH level in the plan 40%.
- Links to WSM for employment with good transport infrastructure to support access to employment beyond the site. Reference to an Employment Land Assessment prepared in response to the consultation that highlights the importance of the types of employment sectors sought and the scale indicating an overall requirement for 6.5ha (mid range).
- Some concern over employment provision and its implications for the SRN. Care should be taken to avoiding use of SRN for local trips.
- In addition to phasing of infrastructure, should ensure housing does not move ahead of employment.

Policy LP2: Strategic Location Yanley Lane (Woodspring Golf Course)

A total of 107 comments were received against this policy. 66% objections, 19% support with amendments, 15% support. Themes and issues which were raised were as follows:

Reasons for objecting:

Principle





- Many respondents repeat the principles for the objection set out in SP7
- There are other non-GB/better sites
- Should not build on GB
- Should be a more dispersed policy in the GB rather than focus on big strategic sites
- Green Belt Assessment should have considered other sites
- Building on the Green Belt is not conducive to the Climate Emergency and should not be considered, even in 'extreme circumstances.'
- Minimal amounts of development being directed to, for example, Portishead and Clevedon
- Suggest a two-stage approach, one including development in the Green Belt, the other without it and challenging the numbers.
- Will set a precedence
- Contrary to 'retaining the GB' option

Scale and impact

- As a totally new settlement it raises concerns about sustainability and suitability as no existing infrastructure
- Too big, both size of site and number of dwellings
- Loss of Golf Course which needs to be replaced with equivalent or better provision.
- Loss of wildlife
- Impact on Long Ashton and surrounds
- Will not preserve separate character and identity of Long Ashton
- Local services will not cope.
- Will not preserve local character in Yanley Lane/Glebe Road
- Any building north of A38 would join with Withywood
- No certainty of delivery within the Plan-period, the entire site could not be built out within the plan period
- New settlements and strategic-scale urban extensions must look ahead for a minimum of 30 years (NPPF) to understand requirements.
- 5,000 dwellings is often given as a minimum figure for a new settlement. The council should be realistic about the anticipated final size of the new community so that it can be designed accordingly from the outset. 2500 will not support a secondary school.

Unsuitable for the following reasons

- Public transport is underwhelming. The metro bus is awful and under used.
- Notion that it will have safe, accessible and sustainable travel options, based on Bristol and North Somerset's history of public transport, is laughable.
- The land floods and with the tanks above the site and climate change it is needed for drainage and water dispersion. Colliters Brook is one of the most volatile watercourses in North Somerset it will place an intolerable threat of regular flooding to the Ashton Vale area. Water runoff is not addressed.
- Lack of facilities, services in south Bristol already under strain
- Will isolate pockets of green space
- Breach of Barrow Tanks is not addressed
- Green space needed for residents of south Bristol
- It will constitute sprawl and merger towards Nailsea



• Bristol's plans for Longmore village and the Cumberland basin will mean people need access to green spaces

Traffic

- Increase in traffic on already congested roads
- Holistic approach to road network required
- A38 needs to be dualled to the airport
- Traffic lights will just cause huge backups in both directions
- The newly completed ring road is already inadequate, cars at a standstill during rush hour
- Yanley Lane and Glebe Road would be above capacity
- People will still have cars still likely to be car dependent.
- The creation of fast bus links is unrealistic

Specific issues

- Should not be referred to as Yanley Lane
- Affordable housing set at 35% in the policy yet SP8 says 40%
- Site should not include Big Barrow wood or any other woodland
- Where development sites are adjacent to ancient woodland a minimum 50 metre buffer should be maintained between a development and the ancient woodland.
- Will take time to deliver the necessary infrastructure therefore housing completions will not happen until the end of the plan period
- It is a sensitive landscape and don't accept that parcel 10 is low in terms of merger of settlements (GB review)
- Policy should address the potential for a new railway station at Yanley
- Heritage impact assessment should be undertaken
- Site master planning must consider proximity to watercourses and ensure no off site (downstream) impacts.
- This site is within the Barrow Tanks Reservoir inundation zone which need to be considered.
- Evidence required of the sites relative historic landscape sensitivity and its significance in the wider landscape setting of western Bristol (the juxtaposition of urban and rural being apparent), and with regard to individual heritage assets such as the Suspension Bridge and Ashton Court.
- High density housing is wrong on every level.
- Will be slums of the future
- Developers will fail to provide 'exceptional' standards of sustainability
- Policy needs to protect Yanley Ridge. It should specify that built form should be offset from the ridge and that significant screening by planting of trees should be provided along the ridge.
- Policy should also be stronger in terms of its protection of green infrastructure, particularly watercourses.
- Policy does not refer to the potential for light spill
- Concern about pollution at Northleaze Primary
- The university Land at Long Ashton should also be released from the GB.
- The development should be sited closer to the Bristol boundary and built at high density
- Better to focus development south of Long Ashton and in the Vale



- 'Beautiful buildings', very rarely is a new development by one of these large national companies beautiful or creative in its design.
- Footpaths will be blighted
- Impact on the best and most versatile agricultural land

Reasons for support:

- Need for housing. Growing number of people unable to find suitable housing
- Has good transport links with Bristol less travel by car
- Amenities and facilities can be built to support the housing
- Doesn't impact the look or feel of existing villages
- Infrastructure is available
- GB should not be allowed to strangle vibrant cities and development leapfrog the GB
- Makes economic and environment sense
- The most sustainable way to create employment and housing provision
- Omission of this site would mean less sustainable sites would be brought forward
- Close to employment in Bristol
- Support the principle of Yanley Lane but the Council should adopt a bolder stance

Suggested amendments:

- Site area
- Red line needs clarification
- Limit site to golf club only not surrounding fields
- Development should include land at the Vale and Long Ashton where a new railway station could be built
- Develop the area around the road and make full use of its facilities. Also close to the site is the Park & Ride which could be adapted to make a transport hub.
- Should include land to the south
- Leave the GB protection in place and allow development on parts of the site within the GB thus protecting the Green corridors
- The council should be bolder with a bigger plan
- The land east of the Lime Kiln Roundabout should not form part of the strategic location. The land is entirely different in character to the land to the east by virtue of being within the line of the highway.
- The northern triangle should be released for employment

Policy wording

- Important to ensure development is net positive for biodiversity
- The development must not jeopardise ecological connectivity in this area, in particularly between Dundry Slopes and the woodland network within North Somerset.
- Strengthen the protection and improvement of water courses and other green infrastructure through clear environmental policies and action plans
- Must be ensured that the ancient woodlands are not negatively impacted by increased recreational pressure
- Noise and light pollution -should be explicitly recognised in the policy

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- Should phase employment to ensure that residential development does not move ahead of employment development
- Policy should give more details about compensation and mitigation
- Updated species surveys every 3 years should be a requirement for any phased development.
- Higher densities and capacity at this location is required, both to ensure the most efficient use of land released from the Green Belt and optimal support for infrastructure investment,
- This area is close to and lies between significant lesser horseshoe bat maternity roosts at Barrow Hospital and Clarkencombe Lodge in Ashton Court. The search area is also within 7km of Avon Gorge Woodlands SAC, Leigh Woods NNR, and Ashton Court SSSI, which are already being adversely affected by recreational pressure. Development at Yanley Vale could result in an increase in recreation at these nearby national and European sites, which in combination with other development in Bristol and North Somerset, could be significant. While we recognise the policy includes green space, the findings of the SA and HRA will need to inform the mitigation and policy requirements for new development
- Policy wording needed to preserve the hedging/trees along the boundary of Yanley Lane and the new development to help screen the development and protect the stream and increase wildlife

Design

- Densities should not be medium to high density it should be more akin to Barrow Hospital which would be more in keeping with north Somerset countryside
- Mass transit is key to achieving change in travel habits
- Site should be linked with Colliter's way and not rely solely on access from Bridgwater Rd.
- Key element of maintaining the separation between Long Ashton and the new development will be the stopping up of Yanley Lane
- Strengthen the protection of Yanley Ridge for aesthetic, wildlife and climate change reasons through specifying that any built form should be offset from the ridge and that significant screening should take place in the development free ridge area but also for the site as a whole. This allows for the continuation and connectivity in terms of wildlife corridors that link Ashton Court estate, Yanley Ridge and the Mendips. The simplest way to do this is to retain the Greenbelt designation in the top half of the Woodspring site with
- the strategic development site designated below this level.
- Employment needs to be provided on the site

Other issues

- Should meet Bristol's unmet housing needs
- With a new settlement of this scale there should be more involvement and responsibility to turn it into a living community

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• Active travel routes should include horse riding

Further work





- Final decisions relating to the scale, nature and phasing of growth in this area must be aligned with and informed by further detailed infrastructure planning at an authority and West of England level
- Further work and cooperation with Bristol City Council will be necessary regarding transport infrastructure, education, masterplanning and community involvement
- The Council should ensure that there is a detailed design led master planning exercise with local residents as part of the local plan implementation policy and for any supplementary planning and design guidance.

- The proposal does not address the strategic priorities eg stop the decline of town centres
- Barrow Gurney has ongoing issues, scepticism about enforcement.
- A Landscape sensitivity report needed
- Better to have 500 house extension to Barrow Hospital and widen Wildcountry Lane
- Better to use the golf course to increase biodiversity creating Environmental Net gain, Nature Recovery Networks, regenerative agriculture, help cool Bristol and local settlements, remove air pollution and mitigate noise.
- Risk that this proposal if implemented would lead to the reinforcement and
- upgrade of the A38 and the expansion of the airport.

Policy LP3: Nailsea and Backwell

A total of 301 comments were received in relation to this policy. 241 objections, 40 support with amendments and 20 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Concerns over adverse impacts of proposed growth to the east of Backwell including impact on agricultural land, the transport network, flood risk and green belt.
- New homes in the area are not meeting the needs of local residents,
- Large increase of development at Backwell compared to size of existing village. Existing infrastructure unable to meet these demands.
- Release of land in Green belt closer to Bristol is a better option.
- Concern over infrastructure delivery required to support sustainable growth.
- Question the assumption that Backwell is a sustainable location.
- East of west transport links are very damaging in terms of noise, air pollution and visual impact.
- Concern over expanding village into town of Nailsea, and impact on identity and character.
- Lack of detail on transport infrastructure/requirements
- Active travel links to Bristol would not work due to distance.
- Should instead consider larger urban areas that can be upscaled.
- Shouldn't be a requirement to build employment as people homework.



- The approach appears to consider Nailsea and Backwell as a single entity which they are not.
- Plan currently doesn't demonstrate how the package of measures including transport will be delivered by development.
- Development around Youngwood Lane area and the western link option poses a flood risk to the adjacent valley.
- Potential for ecological impact, including bats.
- Does not utilize areas close to existing urban areas and therefore does not address climate emergency.
- Concern on impact of growth on Tickenham roads and village. Plan should consider alternative route to Clevedon/ M5 J20.
- Exceptional circumstances have not been demonstrated for the release of Greenbelt.
- Very limited existing employment opportunities in the area leading to increased out-commuting.
- Additional pressure on Backwell crossroads.
- A370 already at saturation point.
- Concern over environmental impact.
- Objection to new Greenbelt to south of Nailsea

Reasons for support:

- Some support for smaller and affordable houses to meet local needs.
- Support for Nailsea as a focus for growth.
- support the principle of development in locations with good public transport and schools.
- Support for provision of North Somerset Nature Park.
- Support for omission of land at southwest Nailsea (HE20611 and 504)

Suggested amendments:

- This area should be treated the same as a strategic location for growth
- plan should phase employment to ensure that residential development does not move ahead of employment development
- Furthermore, the proposal to provide a direct link between Nailsea and the M5 at junction 20 does not appear anywhere in the plan or strategic options. This proposal should remain as an overall strategic objective.
- Account must also be taken of the impact that development in this area will have on water quality in the important ditch and rhyne network close to Nailsea: urban pollution from Nailsea is already a problem for wetlands in the area, and additional development would be expected to worsen this problem. Actions must be taken to mitigate any additional pollution,
- Active travel routes should include horse riding.
- The indication that "a strategic rail crossing" is "likely" is far too weak; this should be a firm requirement indeed a pre-cursor for the strategic housing development without which the housing should not be allowed to be occupied.
- Require explicit policy inclusion that the required growth of Nailsea (c25% increase over the period) will only come forward in line with a developed and consented infrastructure plan, and that development of the identified/allocated sites will only be consented in phase with the delivery of required infrastructure.



- Infrastructure needs to be considered first.
- Concern of deliverability of transport infrastructure.
- Interventions to the transport network need to factor in any post-COVID changes in the way people work and travel.

Policy LP4: Housing. employment and mixed-use allocations

A total of 27 comments were received against this policy. 11 objections, 8 support with amendments, 8 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Insufficient housing identified
- The full housing requirement should be met
- Promotion of alternative sites
- Insufficient employment proposed, with particular references to Backwell, Clevedon and Nailsea
- Concern that too much housing is directed towards Weston-super-Mare and that this is not deliverable
- Object to further growth at Churchill/Langford
- Research by Transport For Homes found that a high proportion of residential developments will encourage car dependent lifestyles

Reasons for support:

- General support for the approach taken to identify the locations. Green Belt should be a last resort
- Welcome inclusion of details about nature of developments within Schedule 1
- Support delivery of affordable housing
- Welcome allocation of strategic sites to assist with meeting market and affordable needs

Suggested amendments:

- Request that schedule 2 should also contain site specific requirements, this means there is a risk that the proposed employment allocations could cause a nuisance to local residents and/or be development before suitable access and infrastructure are in place
- The plan should phase employment to ensure that residential development does not move ahead of employment
- Specific requests regarding the requirements of particular residential sites, and concern that the requirements in some areas (particularly Churchill) are insufficient
 these will be addressed through the schedules
- Additional sites promoted



- Detailed comments offered on each of the proposed allocations from Wessex Water
- Map of high pressure pipelines across the district provided by Exolum Pipeline Systems Ltd
- Request for ongoing dialogue with Bath and North East Somerset Council regarding impacts of proposed allocations on transport network
- Query regarding employment mapping
- Comments regarding housing land supply and delivery, suggesting that to optimize completions a range of types and locations of sites will be needed.

Policy LP5: Educational, sporting, leisure and community use allocations

A total of 20 comments were received against this policy. 15% objections, 65% Support with amendments, 20% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Churchill Leisure centre should be included. It's a much missed facility locally.
- Object to primary school allocation to the rear of Hilldale Road in Backwell.
- Strongly oppose the SEMH school in Churchill/Langford. It should be located adjacent to the urban area to reduce car journeys. The increased traffic associated with it will endanger children who currently walk and cycle to school.

Reasons for support:

- Although there was outright support for the policy some respondents also made additional suggestions:-
- The Playing Pitch Strategy and Built facilities strategies should be kept under review in line with Sport England guidelines. Developer contributions requirements rely on a strong evidence base.
- Duel use of educational sports facilities is possible "use our school" which can avoid the need for additional facilities.
- Query where the new secondary school at Yatton would be sited
- Support for secondary school at Yatton
- Development should be in accordance with the NPPF
- No details for Backwell allocations on provision of facilities
- Should ensure these sites are accessible by all forms of transport.

Suggested amendments:

- Unclear how the educational requirement for three schools has been calculated for Wolvershill. Only two appear to be needed.
- Policy could cross reference to Sport England guidance on "active design" which contains a developers checklist at appendix 1



- On careful review of 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
- 60% increase proposed for Backwell should be accompanied by additional school places, dental services, GP services, business units, shop space and cafes.

- Backwell Pool is in need of an upgrade
- Need more provision for active sport in North Somerset

Policy LP6: Settlement Boundaries and Schedule 5: Settlement Boundary changes.

A total of 83 comments were received against this policy. 37% objections, 30% Support with amendments, 33% support.

Reasons for objecting:

- Small changes to settlement boundaries is better than large allocations
- Policy needs to mention ensuring no harm to biodiversity in second paragraph.
- The policy should be re-worded to support sites coming forward adjacent to the settlement boundary.
- Building on greenfield sites is inevitably going to affect the living conditions of adjoining residents
- The proposed revisions to Backwell's settlement boundary will harm its character.
- Policy is unnecessary and should be removed to avoid repetition.
- Do not support a policy for the extension of residential curtilages, including the extension into the countryside of the curtilage of a dwelling located within a settlement boundary. This could bring flurry of applications from householders and defeat the purpose of settlement boundaries.
- The proposed changes are incongruous with the Council's green belt development policy to restrict infilling between settlements. By reviewing and extending settlement area boundaries you are slowly and systematically permitting infilling and doing so via the back door. The result will be urban sprawl, in areas within the green belt and under the law/planning guidance the Council's planning must prevent this happening.

Reasons for support:

- Setting fixed village boundaries is a positive step. It deters speculative planning applications outside village boundaries.
- Support the allocation of land adjacent to Portbury Village Hall for use as a community facility (Car Park)



- Fully support the clarified settlement boundary in the vicinity of St Mary's Road Portishead and also support the inclusion of Portishead Show Field within the settlement boundary
- Residents of Ham Green are content with the revised settlement boundary to include the existing developed areas comprising the Eden Business Park, St Katherine's Park residential development and St Katherine's School as drawn on the proposed Green Belt and Settlement Boundary map. However, any proposals that might be made, e.g., by the parish council, community land trust or housing association, to introduce rural exception sites or to weaken Green Belt protections at the margins of the proposed settlement boundary, would be very strongly resisted.
- Support the expansion of the settlement boundary to the north of Yatton to include land to the north of Arnold's Way and the inclusion of the Park Farm site and surrounding residential development within the settlement boundary.
- Settlement boundaries are needed to prevent urban sprawl and to retain local identity.
- The Kewstoke 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 Settlement boundary.
- Support for revised settlement boundary at Banwell, Winscombe and Nailsea
- Support as policy strengthens boundaries to prevent unnecessary housing around villages
- Strongly support in order to prevent development currently being promoted on the grounds of being adjacent to current settlement boundaries.
- Support the principle of designating a settlement boundary at Blagdon and at other villages to enable some limited, appropriate development adjacent to the new boundary of these villages, and to provide a clear indication of where this will, and will not be, acceptable.
- Pill and Easton-in-Gordano Parish Council welcomes the proposed extended boundary including Cross lanes and Ham Green (former hospital land).
- Support for the Nailsea settlement boundary
- Support for Redhill having a settlement boundary

Suggested amendments:

- Policy needs to mention ensuring no harm to biodiversity in second paragraph.
- 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 policy wording should be restated and, should appropriate land become available, we would seek to review and adjust boundaries in an updated Abbots Leigh, Pill and Easton Neighbourhood Plan soon after Local Plan 2038 has been formally adopted.

Additional general themes and issues which were raised:

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.

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- Category C villages as set out in the Approach to Rural Areas paper should also have had sites allocated at them.
- We welcome changes to the settlement boundaries. However these are still being drawn too tightly and so are overly restrictive. The draft boundaries still closely follow existing clusters of built form and exclude land between them, which in many cases, are obvious infill plots. They also exclude land at the edge of settlements, where development would represent 'rounding off' and appear as appropriate extension to the village.

Specific boundary changes:

Abbots Leigh

- Do not support the extension of settlement boundary at Abbots Leigh or the proposal by other respondents to include Sandy Lane by Glen Farm.
- Abbots Leigh settlement boundary is too restrictive
- Suggest that the Land adjoining 6 Church Road be included. It was stated by LPA on appeal dated 28 Feb 2019 that it was within the village (18/P/3592/OUT)
- Abbots Leigh boundary should not be changed but remain as it is.
- In trying to prevent any infilling of green spaces, the settlement boundary has not been drawn consistently. There was a green belt field behind the houses at the top of Manor Lane, namely both Slate cottages, Haywood lodge and the Paddock which was sold off to the local houses, approx 4 years ago. This area has been included as garden and has been included within the settlement boundary of the village. This is inconsistent with the approach adopted elsewhere in the village.
- The current layout provides no green links between the Northern sector (Dennyview Rd) and the village centre except via pedestrian access along A369 which has no speed management controls and does not provide pleasant environment for pedestrians. There are green spaces which could be incorporated into the village Boundary. The Baywood Development proposal (submitted on 15th March 2021) for the development of the land located in Harris Lane proposes an alternative route to the centre of the village through an elevated and safe pedestrian green walkway and a modest development proposal for small homes of 90m2. Some of these properties would be offered for sale on shared equity basis providing access to the property market for first time buyers.
- This does not include some properties near the heart of the village along Manor Road, e.g. Manor Lodge, Abbots Leigh Nursing Home and Grangewood House. The boundaries have been too tightly construed without proper consultation. I have an application in the planning system for a certificate of lawfulness for a garden at "Bosley" on Manor Road ref 22/P/0433/LDE. If this is successful, the whole garden should be included in the settlement boundary, otherwise half of my garden will be in and half will be out.
- Please ensure that the Abbots Leigh Village Boundary is not enlarged or extended any further than the existing boundary line to the south west of Glen Avenue and Sandy Lane
- I do not agree with the Abbots Leigh Settlement Boundary, there is land at the rear of our property and adjacent between Harris Lane & Sandy lane that should be included in the Settlement area. I have highlighted this area in Green on the attached Map. These areas are infill as there are houses on all four sides, these



areas could be used for small developments to assist in North Somersets need for housing and to address the Shortfall and assist in the Governments target.

- Abbots Leigh village boundary should not be extended beyond where it is currently in relation to Glen Avenue and Sandy Lane
- The removal of Abbots Leigh from the green belt makes it imperative that the village settlement boundary is very tightly drawn to ensure inappropriate development on country lanes and open green space within the village is not permitted. The plan to put 30 houses in what is currently green belt alongside Sandy lane by getting the land included within the settlement boundary is underhand and would be a vast over development in the greenbelt generating significant extra traffic on narrow lanes that are already heavily used.
- Please ensure that the Abbots Leigh Village Boundary is not enlarged or extended any further than the existing boundary line to the south west of Glen Avenue & Sandy Lane.
- Abbots Leigh Parish Council:
 - Manor Road (Fishpond Lane) Change the boundary to follow the original Village Fence. This avoids inclusion of field in the Settlement
 - Manor Lane (Treetops) Change the boundary to follow the original Village Fence. This avoids incursion of gardens into the Green Belt.
 - Sandy Lane (Staddlestone House) Change the boundary to follow the original Village Fence. Former Village Fence. Includes additional buildings within the Settlement Recommendation
 - Church Road (Leigh Lodge) Change the boundary to follow the original Village Fence. Former Village Fence. Omits and includes only the garden in the Settlement
 - Church Road (Deerhurst) Change the boundary to follow the original Village Fence. Former Village Fence. Excludes land outside curtilage.
 - Manor Road (Manor Lodge, The Coach House) Inclusion of Manor Lodge, the Coach House, Abbots Leigh Nursing Home. The site is immediately adjacent to neighbouring properties (shared wall). The Nursing home employs 60 staff and has an average of 50 resident users. Other than the nursing home accommodation and the rear garden (seating for care home residents and their visitors) much of the site involves outbuildings and is in effect brown field. Inclusion would not harm the form and character of the overall village settlement, would correct an anomaly, would fill a community use, and would provide around 60 jobs (several held by local people). That part of the garden to the west would remain Green Belt. None of the criteria which exclude sites from the settlement boundary apply to the Nursing Home, and certainly not to the two residential dwellings within the site.

Backwell

- Objections to extended settlement boundary at Backwell to incorporate new proposed housing allocations.
- The whole of Moor Lane should be included in the settlement boundary.
- Request to remove two fields from the Green Belt and include them in the settlement boundary. Fields are located either side of Backwell Hill Road to the East of Backwell.





- Suggested inclusion of Backwell House and properties on Backwell Hill Road to the east of Backwell.
- Suggested inclusion of land to the south of Oakleigh Close and Hilldale Road.

Banwell

• Suggested inclusion of properties to the north of the settlement along Wolvershill Road.

Blagdon

- Settlement boundary should be extended to include Mendip Garage, identified as 'Depot' and 'Garage' on the Policies Map and falling between the residential properties of 'Twincott' and 'Pipits', comprises a mixed-use garage and residential property which consists of a single residential property and 4 no. outbuildings used for ancillary storage.
- Suggested inclusion of playing fields and recreation ground.
- Suggested inclusion of properties along Sladeacre Lane up to and including Sea View.
- Suggested inclusion of Lower Hill Farm.

Bleadon

- Land North of Amesbury Drive (HE2051) should be included in the settlement boundary for Bleadon
- Bleadon Parish Council want no changes to the existing settlement boundary
- The field opposite Catherine's Inn, behind the Fiat garage should be included in the settlement boundary. It is close to public transport, cycling and walking into the village are easy, and it would not be detrimental to the local environment. It would also contribute to the district's correctly identified need for affordable housing as defined in SP8.
- Suggested inclusion of Purn Farm and Holiday park.
- Suggested inclusion of walnut Cottage, Catherine Inn and the garage.
- Suggested inclusion of land to the east of Bleadon House.

Churchill and Langford

- Suggested inclusion of land on the corner of Church Lane and Churchill Green opposite Churchill School
- Suggested inclusion of school and farm and buildings opposite school to the south.
- Suggested inclusion of properties to the south of Dinghurst Road
- Suggested inclusion of land to the west of Ladymead Lane and north of the village hall.
- Suggested inclusion of properties to the north of Jubillee Lane including Jubilee House, Primrose Farm and Acresfield
- Suggested inclusion of land adjacent to Markham Nursey.

Clapton-in-Gordano

- Suggested inclusion of Brook Farm and Clapton Farm
- Suggested inclusion of properties along Caswell Lane to the east of the settlement.

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Claverham

• Extend boundary to include land adjoining Jessamine Farm, Jasmine Lane, Lower Claverham, BS49 4PY

Cleeve

- Suggested inclusion of recreation ground
- Suggested inclusion of land to the south of properties on Main Road and north of properties on Chapel Lane

Clevedon

- Suggested Inclusion of land and buildings on Norton Wood Lane.
- Suggested inclusion of Kenn Business Park

Congresbury:

- Objections to settlement boundary extending around Pineapple Farm site.
- 48 Venus Street, Congresbury request that extent of the settlement boundary is also extended in an Easterly direction to include the parking area, garage and side garden as highlighted in green. Also suggestion of the 1.2 acre paddock to the rear of the property to a potential housing site
- Suggested inclusion of properties to the west of the Smallway opposite Cadbury Garden Centre.

Dundry

• Suggested inclusion of recreation ground

Easton-in-Gordano/Pill

- Boundary should be extended to include land at Beechwood Road.
- Request that the northern cricket ground (now a general sports field) hatched in green contiguous with the Watchhouse Hill Local Green Space and the southern cricket ground (the field and pavilion used by Lodway Cricket Club) coloured green to maintain the consistency of Green Belt, noting that a public right of way for recreational use is shown on Ordnance Survey Map No.154.
- Residents do however wish to see the Lodway Cricket Club ground reincluded as Green Belt in the redrawn settlement boundary map
- Suggested inclusion of Cricket Ground at Ham Green

Failand

• Suggested inclusion of Ashton Hill Farm

Felton

- Include Land at Dial Lane within settlement boundary.
- Include land adjoining 25 Currells Lane, Felton, Bristol, BS40 9XG



- Suggested inclusion of land between main settlement and Long Cross
- Suggested inclusion of residential properties to the north west of the settlement.

Flax Bourton

- Suggested inclusion of properties along Main Road to the east of Flax Bourton
- Suggested inclusion of Farleigh Green recreation ground on Rosemount Road

Hutton

 Changes to the settlement boundary at the Grange Farm site extend beyond the brownfield site. Understanding that the brownfield site is likely to be developed but, taking into consideration historical views of Parishioners expressed in the Hutton Local Plan 2004 and 2019, 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.

Kenn

• Inclusion of the front garden of Mead Cottage and the stables and workshops in the settlement boundary for Kenn.

Kewstoke

• PC objects to the inclusion of the paddock to the east of 'Karibu' and agricultural land and buildings to the East of the 'Hideaway' Crookes Lane within the revised settlement boundary.

Leigh Woods

• Suggested inclusion of Rownhams House and gardens.

Locking:

- Settlement boundary should run parallel with A371 so the additional land can be developed for housing
- Locking Parish Councils comments on the proposed settlement boundary changes
 - o Area 2:
 - Locking Parish Council would consider building on the brownfield site only (where existing buildings are currently situated) it would not support building on the field that had been used for horticultural/agricultural needs.
 - Locking Parish Council would not accept 50 houses on this site
 - Locking Parish Council would only consider a very small development – 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
 - o Area 4:



- Locking Parish Council Objects to this boundary review the land is a small narrow strip with no value and cannot see the benefit of moving the settlement boundary.
- This is a small parcel of land that was given planning approval on 31st March 1980 to provide formation of a 15-foot agricultural access onto OS field 9062 (i.e. the field to the South) so nothing has changed for 42 years. Locking Parish Council asks why all of a sudden should it be included as part of the proposed new settlement boundary when it cannot clearly have a dwelling on it.
- o Area 5:
 - Locking Parish Council asks who called for the Primary school site to be 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

- Suggested inclusion of Lower Court Farm area
- Suggested inclusion of Parsonage Farm.

Nailsea

- Settlement boundary should be extended to include Land at Poplar Farm, West End, Nalisea
- The settlement boundary to south of Nailsea and Green belt proposal should be reconsidered as it is limiting sustainable development.

Portbury

• Suggested inclusion of additional land at Newlyn

Portishead

- The house called Middle Bridges, on Bristol Road, BS20 6QG, and houses called 'The Old Stable Yard', and Brixtone Cottage are currently within the Green Belt. As part of Green Belt Review Part 1 these properties are within site number 2. We have responded to SP5 suggesting that our properties should be included within the settlement boundary of Portishead.
- Portishead Town Football Club: note that the existing clubhouse and immediate surrounds is now excluded from the Green Belt and included with in the Settlement Boundary of Portishead. Welcome these amendments as the logical inclusion of previously development land within the town boundary, with potential for appropriate growth of the Club and the potential for further community development.
- Land containing Tower Farm buildings is proposed to be moved into the Portishead settlement boundary. I do not support this move as anything that makes development around Weston Big Wood more likely should not be put forward in the Local Plan
- Suggested inclusion of houses on Woodhill Road.

Sandford



- Boundary should be extended at Sandford to include Station Road Farm
- Suggested inclusion of Woodview Bungalow and garden.
- Suggested inclusion of Woodland Court and its curtilage

Tickenham

- Boundary should be extended to allow more limited infilling, particularly on Tickenham Hill.
- Include the garden of 131 Clevedon Road in the settlement boundary as the neighbouring properties garden (129 Clevedon Road) is included.
- Suggested inclusion of 240 220 Clevedon Road and land in between
- Suggested inclusion of land behind 239 219 Clevedon Road.
- Suggested Inclusion of Barrow Court Farm
- Suggested inclusion of Garden Centre
- Suggested inclusion of land to the west of South View Farm
- Suggested inclusion of land to the west of Cadbury Court Farm.

Weston-in-Gordano

• Inclusion of Sprigg Farm in the settlement boundary

Weston-super-Mare:

- Settlement boundary should extend around Land south of Bleadon Hill (HE2035)
- Suggested inclusion of properties 112 and 114 and their curtilages on Worlebury Hill Road

Winscombe

• Suggested inclusion of Sidcot School and surrounding area including properties along Oakridge Lane including Oakridge Close

Wraxall

• Wraxall should be considered as an inset village in the Green Belt as the Battleaxes pub site could be a community facility.

Wrington

- Suggested inclusion of properties at Maines Batch at the north of the settlement
- Suggested inclusion of recreation ground

Yatton

• Extend the settlement boundary further around Smart Systems to allow for expansion.



• Suggestion that the Grange at north end Yatton (BS49 4AT) and its curtilage should be included as it relates closely to the built up form of settlement, particularly in light of proposed allocations, particularly Box Bush Farm, and the new rugby club referencing SP6, SP8 and LP6. A dwelling of over 400 yrs and in the original hamlet of north end should be included.

Policy LP7: Town Centre Hierarchy

A total of 15 comments were received against this policy. 29% (3) objections, 47% (7) Support with amendments, 33% (5) support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Query why Nailsea Town Centre is fourth in the list of bullet points? The proposed allocations at Nailsea will require some significant upgrades to the town centre.
- The policy reference to "town centre uses" should be amended to "main town centre uses" to align with the definition of "main town centre uses" in the NPPG Annex 2: Glossary
- Nailsea Town Centre is dead. The High Street be redeveloped with hundreds of new flats to bring in customers.

Reasons for support:

- The allocations map will require updating to reflect the extant outline planning consent and latest pre-application discussions at Locking Parklands
- Should be an emphasis on access by public transport and walking rather than cycling which is primarily recreational.
- Backwell will no longer be a village (i.e with a village centre) if 1120 further house are built
- No mention of the villages of Tickenham or Kenn.
- Agree with keeping and improving town and village centres. Need to think about design of centres and out of town centres to be more easily accessed by the elderly, mobility impaired who are reliant upon public transport

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Suggested amendments:

- "town centre uses" should be amended to "main town centre uses"
- Allocate residential development in the town centre of Nailsea

Additional general themes and issues which were raised:

None



Policy LP8: Extent of the Green Belt

A total of 118 comments were received against this policy. 60% objections, 26% Support with amendments, 14% support. Themes and issues which were raised were as follows:

Many of the representations repeat comments made in SP7 (Green Belt), LP2 (Yanley Lane) and LP3(Nailsea and Backwell)

Reasons for objecting:

General

- The exceptional circumstance case not fully made to release GB
- Should be challenging the Government that local circumstances must be taken into account when setting housing targets
- Should wait for the Planning Bill to see Government's response before making any suggestion of releasing Green Belt.
- Green Belt is important for the physical and mental benefit of existing local residents
- Green Belt areas shouldn't be built on
- The limited scope of the Green Belt review contributes to a spatial strategy that is not informed by a comprehensive assessment of the Green Belt and all reasonable alternative sites
- Any change will set a precedence
- Green Belt should be extended to the AONB
- The plan should increase the gross overall provision of Green Belt within North Somerset, rather than just re-allocating the existing GB provision
- The Green Belt should include villages adjacent to AONB and sites of special scientific interest, along with areas housing and supporting endangered and protected species.
- Other sites in the Green Belt should be released for housing

New Green Belt

- Unnecessary to create new GB at Nailsea as land is protected by flood plain and railway.
- It prevents sustainable housing coming forward
- New Green Belt should exclude part of Nettcott Meadow, Bucklands End Nailsea, for the construction of two houses
- Object to part of Moor Lane site falling in the proposed GB. New GB is not a way of replacing released sites, it should meet all five GB purposes
- The Council should be satisfied that the proposed new area of Green Belt between Nailsea and Backwell is justified having regard to the provisions of paragraph 139 of the NPPF.
- How can the promise to designate new areas of Green Belt be believed since it seems so easy to override previous designations.

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- A new area of Green Belt is proposed between Nailsea and Backwell "to maintain the separation of the two settlements". The real reason is to compensate for the plan to build 500 houses to the East of Backwell on land which is presently in the Green Belt. This exchange is not like for like as much of the land being proposed for Green Belt status is unsuitable for building anyway.
- Support the need to maintain a separation between Backwell and Nailsea, we question why this could not be achieved through normal planning and development management policies such as a 'Strategic Gap policy'

Backwell

- Not justified to release GB land that would result in "moderate/high" harm.
- Land at Yanley Lane a much better location for more development as it is nearer more facilities, requires less commuting, is less damaging to the environment and requires less new infrastructure.
- The land east of Backwell does not meet the exceptional standards test.
- Development east of Backwell removes easy, pedestrian access to green space for hundreds of people which will result in them driving to green space.
- It will reduce the quality of life of those living nearby and destroy wildlife habitat.
- It is inappropriate that Backwell should suffer the very large increase in allocation of dwelling houses under the plan
- The effect of releasing the land East of Backwell will be to encourage creeping development Between Backwell and Flax Bourton in the future.
- Better to build on Farleigh Fields which are not Green Belt. Backwell Common is important for the wellbeing of residents and visitors who use the footpaths and lanes plus is a haven for wildlife including some protected species
- Loss of prime agricultural land. It is to detriment of the openness of the countryside.
- It borders a school where pupils and teachers benefit from the openness of their landscape beside their learning space.
- Backwell is based on the extremely busy A370 which would need extensive road improvements at a time when many roads in North Somerset are being allowed to deteriorate and no new roads are planned.
- It will fundamentally change the character of Backwell
- The Green Belt east of Backwell is far more important and valuable to the character of the village and surrounding area than the proposed new area

Yanley

- The impact of development will be felt in the immediate area of South Bristol and parishes in the area such as Dundry, Long Ashton, Barrow Gurney and Failand.
- The proposal for thousands of homes at Yanley, with more to come, will in effect become an extension of Bristol, at a cost to North Somerset. It will put more pressure on the A370 and A38 at a time the Council has already argued about the effect of the Airport expansion.
- Yanley would be a garden city. The SA shows it doesn't have an affordable housing need and its rates as low for sustainability. Proximity to Bristol is oversold. It will be car dependent garden city. The 'urban' area this site is closest to is just a residential zone where the residents are car dependent. It is not a sustainable extension to an urban area. This is an isolated garden city with magical dreams of becoming a Bristol suburb in 20 years. Realistically, it's just going to be 5,000 homes



and constant construction that will span two decades slowly trickling housing that will have no benefit to the local community.

- It will impact a wide area by increasing footfall in areas that are already heavily utilised such as Ashton Court, Tyntesfield, Failand Estate, Priors Wood Nature Reserve and other green and blue spaces including the local footpath network.
- The proposal is a freestanding Green Belt incursion separated from the edge of Bristol by a relatively narrow residual tranche of Green Belt adjoining the A4174. How defensible this, and indeed other adjoining areas of the Green Belt, are likely to be in the longer term, as required by paragraph 143 (f) of the NPPF, is open to question. If Green Belt incursion is demonstrated to be required to meet the objectives of the Plan the configuration and extent of the land removed should be able to meet all of the relevant criteria set out at paragraphs 142 and 143 of the NPPF.
- An additional area of land at Yanley (around Colliter's Way) should also be released for development

Portishead

- The Portishead proposal will put even more pressure on both J19, the road to Clevedon and minor roads through the villages which are all already frequently at gridlock and dangerous
- Object to removing land at Clevedon Rd from GB, the principle of moving the settlement boundary to allow development is unacceptable. Also, it is near Weston Big Wood and in the Gordano Valley

Villages

- Many of the villages inside the Green Belt haven't had housing development since the Green Belt was introduced in 1986. They are exclusive areas requiring young or less wealthy residents no option but to relocate to urban areas. This problem is well known but not addressed in the Local Plan and the Council has avoided the potential to allow organic and small-scale growth by tightly restricting settlement boundaries to all but a few locations.
- There should have been a detailed review of settlement boundaries at an early stage and consequent change proposed to the Green Belt boundary at Cleeve to facilitate appropriate and sustainable housing allocation sites at the edge of the village.
- The area at The Grove, Wraxall does not fulfil a GB function. It contains a highdensity former Council estate including two three-storey blocks of residential accommodation together with a three-storey former public house/ hotel together with extensive car parking and ancillary accommodation. It should be given a specific settlement boundary and included within the list of villages contained within section 5 of policy LP8 to be inset from the GB.
- The inset at Tickenham excludes many houses, further consultation with the PC is required
- There is no room in villages, build if you must near major conurbations, not in villages.

• Failand should not be inset from GB it stops urban sprawl by a process of stealth



- Flax Bourton should not be inset from the Green Belt it prevents inappropriate development and preserves the "openness of the countryside". It is in proximity of Tynesfield and is open. The policy is inconsistently applied.
- Site to the west of Long Ashton should be released from the Green Belt and boundary amended.
- Proposals to construct affordable dwellings in clusters immediately adjacent to settlement boundaries should be resisted.

Port and Airport

- GB inset needs amending at the airport
- Land at Shipway Farm needed for port-related uses and should be released from the Green Belt. The exceptions test is met.

Reasons for support:

- Support inset at Cleeve
- Support Failand inset
- Support for maintenance of GB around Portishead other than one location
- Welcome new GB at Nailsea/Backwell
- Support insets and that they are not being adjusted to include new green field development sites
- Encouraging that the Council has decided to release land from the Green Belt. This will help the Council in meeting its overall housing need, and in doing so, will increase the amount of affordable housing delivery across North Somerset
- The extension of the existing Green Belt to the west of Station Road is welcomed to maintain the separate identity of the Nailsea and Backwell and the setting to the Backwell Lake.
- Welcome Yanley it meets most of the sustainability criteria closer to employment areas, better public and private transport infrastructure, less travel by car. Removal of this site would by implication mean that other less sustainable sites would need to be included.
- Strongly support the approach. The release of land to create the two new villages appears to be the only way the housing target will be achieved. It is particularly important to prevent the merger of towns and villages as this will lead to a significant loss of character and openness in the area. Residents living in villages tend to value their separate identify, character and community feel something that could easily be lost if these villages are subsumed into a larger town.
- It is encouraging that villages in the Green Belt which do not contribute to
 openness will be inset from the Green Belt. This will assist in directing new
 development to areas which will not have such great impacts on the Green Belt
 and will remove barriers that currently prevent much needed affordable housing
 delivery in such villages.
- Support GB release east of Backwell as exceptional circumstances have been fully evidenced
- Making small changes to village settlement boundaries is also a good way of helping to build communities without causing environmental damage



Suggested amendments:

- The plan should increase the gross overall provision of Green Belt within North Somerset, rather than just re-allocating the existing green belt provision.
- GB should be extended to the AONB
- Land to the south of Grove Farm Backwell should not be included in the new Green Belt and an adjacent area of existing GB up to the A370 should be released from the GB to facilitate access and development.
- Additional Green Belt should be made to the west of Nailsea to prevent excess development and loss of countryside and amenity value in what is a heavily used and well enjoyed area.
- Development should be centred on Ashton Vale where the Green Belt adjoins Bristol City boundaries. It is Bristol's Green Belt after all - not a Green Belt for North Somerset. By extending the built environment into Ashton Vale from Bristol, this would be better use of low grade formerly industrial land with little public access or use / amenity value.
- Proposals for small affordable clusters of housing adjacent to settlements in Abbots Leigh, Pill and Easton-in-Gordano should be allowed. Limited housing on the edge of Abbots Leigh/Pill would not inhibit enjoyment of the Green Belt and the range of opportunities it offers.
- Add to the benefits of the new Green Belt at Backwell 'the protection of the Local Nature Reserve of Backwell Lake.'
- Support Abbots Leigh boundary but it should not be enlarged or extended any further than the existing boundary line to the south west of Glen Avenue & Sandy Lane
- Broadly content with the redrawn Green Belt at Ham Green. However, would like to see: the northern cricket ground (now a general sports field) hatched in green contiguous with the Watchhouse Hill Local Green Space; and the southern cricket ground (the field and pavilion used by Lodway Cricket Club) coloured green to maintain the consistency of Green Belt
- Recommended that additional policy text is provided, suggested wording for this addition is: 'Further Green Belt amendments can be made through neighbourhood plans in order to facilitate development commensurate with the scale of the settlement.' Thus, enabling communities such as Easton-in-Gordano/Pill to shape future development opportunities
- East Backwell should only be released if a) Nailsea & Backwell Railway Station being improved to full disabled access standard b) Transport changes being made which enable the bridge under the railway at Backwell to be restricted to buses, cyclists and pedestrians only c) The additional Green Belt west of Backwell being extended to include the ridge that extends from the farmhouse towards Station Road
- Land to the Northeast of Nailsea within the Parish of Wraxall is better suited for taking out of the Green Belt this will allow for more sustainable development to take place in a location closer to the towns amenities including jobs, schools and retail.

Additional general themes and issues which were raised:

• Developers have not reached previous target levels for 13 years, so there is no credible argument to further increase North Somerset's allocation. If a developer



persuades an Inspector that there is a need for more housing they should get on and build them within a phased planning permission

- Given the Green Belt review and potential changes to the Green Belt there should be further dialogue and engagement on the approach to the Green Belt in order to ensure, as necessary, consistency of approach with work in the WECA area.
- The outlined proposals are merely going to extend the already intensely built up areas where, in fact, Nailsea needs more large Green Amenity sites that are not overwhelmed by inane and irresponsible re-wilding exercises.

Policy LP9: Strategic gaps

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

Reasons for objecting:

- Include the gap between Sandford and Churchill as a strategic gap.
- a strategic gap is needed north of Bleadon to help prevent 'encroachment' from Weston, and protect the setting and character of Bleadon settlement
- The Moss II land should be excluded from the strategic gap between Parklands Village and Weston super Mare, and allocated for development.
- Object to the removal of the strategic gap between Nailsea and Backwell, which differentiates the 2 locations and their identities, and stops gradual amalgamation and mass sprawl of housing, vital with large scale developments and transport infrastructure planned.
- There are many more important strategic gaps in North Somerset, which should be included.
- Strategic gaps add a further layer of restriction to sustainable development opportunities beyond the existing Green Belt boundaries
- The Strategic Gap background paper (2022) study does little to demonstrate why land west of Elm Tree Nurseries provides a function of the gap. The council should review its evidence on this, as the housing allocation should be extended westwards.
- Land between Cleeve and Claverham and between Cleeve and Congresbury should become strategic gaps, to retain separate identity and protect Horseshoe Bats.
- the gap between Sandford and Churchill should be included in these identified gaps
- The strategic gaps background document removes some areas from the designation to enable housing sites to be allocated. The same logic needs to apply to SHLAA site ref 201037, currently in the gap between Weston and Locking.
- The justification for retaining strategic gaps as set out in the background paper is wholly inadequate. They are not endorsed by national policy like the NPPF, and as a blanket designation act as a brake on appropriate innovation or change. The proper approach is now to test any development proposal against the relevant place-making objectives.

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- the strategic gap between Weston-super-Mare and Locking is a highly sustainable location, ranking as a high priority in the search sequence for development opportunities in the spatial strategy of the plan. So continuation of the strategic gap requires the most rigorous scrutiny.
- land to the south of Laneys Drove between the Weston Business Park and Oaktree Residential Park should be removed from the strategic gap. It will not diminish the gap between Weston and Locking.
- The 3 gaps should not be removed to allow some green space between estates, very important for mental and physical health.
- Land should be not be included as strategic gap in this location, as it is now central to the parish of Locking which is not what the policy is for. Locking Village and Parklands Village are part of the same parish and cannot lose their own identity because the A371 is the gap, so they cannot merge.

Reasons for support:

- Support strategic gaps. LP9 only mentions gaps for specific areas. Settlement boundaries can help others, but won't if settlement boundaries can be extended within policy.
- Oppose removal of strategic gap between Weston and Uphill. If it is to be removed because it cannot be considered 'strategic', that illustrates the need for other towns and villages to have gaps.
- It is crucial to maintain a strategic gap between Hutton and Weston. Changes to the gap at Grange Farm beyond the brownfield site reduces its effectiveness.
- Impacts on flood plain and biodiversity must be considered for any new development within these areas.
- Support a high quality strategic gap or green belt between Yatton and Congresbury, which should be widened to meet the existing settlement boundaries.
- The strategic gap for Nailsea and Backwell must only be removed if the corresponding change to the Green Belt is approved, covering the full strategic gap. The strategic gap should be included to ensure that this is maintained.
- Fully support a strategic gap between Banwell and the bypass, but is should extend to all of the gap in this location, not just the Western end, south of the bypass. It is essential for green infrastructure, allotments and open space provision.
- It is unclear from Policy LP1 whether the Wolvershill strategic gap forms part of the allocation boundary. This strategic gap should also have improvement of connectivity, inclusion of play areas, informal recreation or ecological enhancement.
- There is merit in having some strategic gaps but their extent needs careful consideration if the intention is to sterilise the area from future development.
- Support removal of strategic gap between Nailsea and Backwell which has prevented sustainable development close to the railway stations.
- Where is the GP surgery going to find a suitable and affordable site if the Yatton/Congresbury gap is maintained?

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• A new strategic gap between the existing settlement of Long Ashton/Yanley and the proposed development at Woodspring Golf Club should be considered.



- Principle of maintaining gaps to separate distinct communities is valid for Abbots Leigh, Pill and Easton in Gordano; eg. gaps along the line of the A369 at Blackmoor or Chapel Pill to avoid urban sprawl from Leigh Woods to the M5.
- Prescribed gaps are needed between Clevedon and Kenn and Clevedon and Tickenham
- Using land as allotments may help with strategic gaps. A massive increase in allotment sites is needed, easily accessible to residents to promote non-car transport.
- Strategic gaps are needed south of Locking and north of Elborough, East of Hutton and west of Elborough, and East of Elborough and West of Banwell
- These areas are very important to retain the individual character of areas, avoiding merge of areas into one huge metropolis.

Suggested amendments:

- Either LP9 should be re worded to allow more flexibility regarding permitting any change to the 'natural' environment, or reference to Wolvershill should be removed from LP9 and covered in Policy LP1 only, given the nature of the Banwell gap, and the need for connectivity across it.
- Policy needs caveats, as it has no mention of the current ability to "nibble" away at a strategic gap. Left unchecked the accumulative effect on the Nailsea/Backwell gap could be significant with multiple developments being approved.

Additional general themes and issues which were raised:

None

Policy LP10: Transport infrastructure allocations and safeguarding

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

Reasons for objecting:

- Policy doesn't say anything about transport infrastructure required to support growth at Nailsea and Backwell
- 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.
- Concern over impacts of the Banwell Bypass and associated growth, including impacts upon nearby Sandford, and Churchill.
- Concern over safeguarding of land either side of the railway unless NSC willing to CPO land.
- Objection to the policy as the plan does not include any integration of medium to long term road infrastructure required by other local authorities and does not

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include any support information confirming the plan integrates with wider requirements.

Reasons for support:

- Airport support for major transport schemes linking to the airport.
- Some support for prioritization of active travel and public transport.
- Support for reopening of Portishead Branch Line.

Suggested amendments:

- As with the generalised Mass Transit suggestion this Policy should include "Active Travel Routes on new alignments or widened existing roads". This would help to get future proposals past objections.
- The M5 junction 19 area identified under Policy LP10 should exclude the land safeguarded by current Policy DM 49 at, and adjacent to, Court House Farm.
- A direct route linking M5 to Nailsea should be reconsidered to take pressure of other routes including through Portbury.
- Banwell Bypass should be extended to the A38.
- The Runway at Haywood Village does not need to be a dual carriageway.
- A new J21 is required.

Additional general themes and issues which were raised:

- Role and function of the M5 J21 Relief Road needs to be clarified including its relationship to the proposed Wolvershill Strategic Site.
- More detail sought on Mass Transit including alignments. A38 is already congested.
- Concern over further growth in the Congresbury area without improvements to sustainable and affordable public transport to airport.
- Insufficient detail on the transport schemes to enable assessment of impacts on habitats and species.
- Consideration of transport infrastructure within the flood zone.
- Comments provided by Network Rail in relation to any proposals with implications for the railway and associated infrastructure.
- Some comments on transport links between the M5 and the airport.
- 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. Concern that the transport infrastructure and mitigation measures have not been properly identified, costed or feasibility tested.
- Concerns over deliverability of proposals.
- Question around future proposed works to J20 of the M5.
- Current uncertainty as to requirement for, scope and scale of any works required to the SRN as a result of the Local Plan proposals.
- Concerns over level of traffic including through Portbury, and Tickenham.

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- Comments regarding the need for investment and enhancement of Nailsea station, including support for transport hub concept. However some questions around the practicality/ deliverability of this.
- Question why the Long Ashton station isn't going ahead given the development proposed.



Policy LP11: Bristol Airport

A total of 38 comments were received against this policy. 32% objections, 52% support with amendments, 16% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Multiple objections on grounds of climate change, congestion, pollution, impact on wildlife, health and wellbeing, landscape and Green Belt impacts.
- Policy must be redrafted to take account of the recent appeal decision.
- Suggestions that the policy does not do enough to support sustainable travel options
- General objections to airport growth

Reasons for support:

- Multiple comments supportive of the proposal to produce a Supplementary Planning Document, and suggestions that the scope of this document should include parking issues
- Some support qualified, content with policy as drafted, subject to effective implementation/enforcement
- Support for airport growth as a major employer
- References to environmental issues are welcomed

Suggested amendments:

- Concern that the phrase 'in step with' is too imprecise and that this could be sharpened to ensure access improvements are made in advance of any further growth
- Request from the Environment Agency to refer to water quality within the listed impacts
- Request from Bristol Airport Limited to discuss the content of the policy further to ensure that it is in accordance with national aviation policy and to set out why a Supplementary Planning Document is needed and what its purpose would be
- Request from Natural England to expand upon the impacts of potential growth on the nearby Bats Special Area of Conservation
- Proposal from the Parish Council's Airport Association and from Butcombe Parish Council to amend the initial statement and bullet point 2 as follows: Within the Bristol Airport Green Belt inset as defined on the Policies Map, the development of facilities which contribute to sustainable improvements to operational efficiency and passenger safety at the airport will only be acceptable provided that:
- (BP 2) They have no material adverse impacts on the living conditions of residents and the environment, in terms of noise, air quality, visual and landscape impact, biodiversity and climate change.
- Request from Wrington Parish Council to insert the following into the policy: "In considering any planning proposal, substantial weight will be given to the prevention of any harm to local communities likely to result from noise, emissions, environmental degradation or traffic generation associated with the proposal."

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• Bullet point 2 states 'are not acceptable' which is subjective. There is a need for measurable controls.

Additional general themes and issues which were raised:

- Lots of comments regarding wider highway network and potential impact on junctions such as Brockley Coombe, Downside/A38.
- Comments from neighbouring authorities regarding wider transport links beyond North Somerset boundaries
- Multiple references to mass transit solutions and sustainable and affordable public transport options
- Detailed comments in respect of flight paths and environmental impacts of aviation

Policy LP12: Air Safety

A total of 5 comments were received against this policy. Zero objections, 1 support with amendments, 4 support. Themes and issues which were raised were as follows:

Reasons for objecting:

• No objections to the policy.

Reasons for support:

• All response's were supportive of the policy including Bristol Airports response.

Suggested amendments:

• No specific amendments suggested.

Additional general themes and issues which were raised:

• One comment regarding the flight path at Bristol Airport and whether it has changed and whether the council has sufficient resources to monitor and enforce activities at the airport.

Policy LP13: Royal Portbury Dock

A total of 10 comments were received against this policy. 1 objection, 2 Support with amendments, 7 support.

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Reasons for objecting:

- Objection from The Bristol Port Company that land at Shipway Farm hasn't been removed from the Green Belt and allocated for the future expansion of the Port. They feel that the NPPFs exceptional circumstances test is met to allow release of Green Belt. They also feel that the plan has been prepared without a proper understanding of the Ports future requirements and therefore the policy is not based on up-to-date evidence.
- Given the very close proximity of Royal Portbury Dock to the Severn Estuary national and European designated site concern that the policy omits any reference to this. The policy should recognise the designated site and its wide range of sensitivities to the effects of new development, particularly the need to protect water quality and birds from disturbance (Natural England).
- The policy makes no reference to renewable energy in this area, although we note that wind energy search areas have been identified in this location. Wind turbines could be a risk to birds associated with the Severn Estuary SPA/Ramsar site, and the policy should provide guidance on the requirements for renewable energy proposals, informed by the HRA/AA.
- The policy should also recognise the importance of this area for horseshoe bats associated with the Bats SAC, as recently demonstrated by the findings of the bat surveys undertaken to support the MetroWest scheme, which recorded significant greater horseshoe bat activity along the railway line to Portishead. This will also be an important consideration in relation to proposed improvements at J19

Reasons for support:

- Numerous respondents support the fact that the policy proposes no further Green Belt amendment, and that the policy justification recognises the ecological sensitivity of the remaining gap. Respondents particularly felt that economic growth should not be prioritised over the climate emergency.
- Bristol City Council broadly supports the draft policy approach to Royal Portbury Dock which seeks to ensure its role is maintained and enhanced through sustainable growth and development. The Council also welcomes reference to the wider port in Bristol and the particular support given to development that increases local employment opportunities.
- Support from Portishead TC and Easton-in-Gordano PC who strongly support the aim to 'improve connectivity and perceived safety of routes for employees'.

Suggested amendments:

- Shipway Farm should be removed from the Green Belt and safeguarded for future Port expansion.
- This policy should also reference flood risk and climate change.

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• Policy should specifically mention the aim of creating a Parkway rail station at Royal Portbury Dock as part of creating a cohesive integrated transport network.

Additional general themes and issues which were raised:

• No other issues were raised.

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Policy LP14: Local Green Space

Summary of responses: total of 24 comments were received against this policy. 3 objections, 9 Support with amendments, 12 support. Themes and issues which were raised were as follows:

Reasons for objecting:

• I object to any policy which allows development on a Local Green Space. Policy needs to be much stricter, having seen development on green space amenity land allowed in Nailsea.

Reasons for support:

- Support LGS protection
- Local green space in North Somerset is already greatly restricted, and very small in in Long Ashton, and nationally much land is inaccessible to the public.
- People need to interact with wildlife on their doorstep, so its needs are more respected. Areas set aside purely for nature's recovery are vital.
- We recommend a minimum 50 metre buffer where development sites are adjacent to ancient woodland,
- We support protection of green space, particularly specified locations adjacent to ancient woodland at Portishead, Clevedon and Wrington.
- Policy should also include Local Wildlife Sites.
- Support the Local Green Space designation at Ashton Court.
- Backwell currently has excellent local green space NSC's plans will destroy this.
- Ensure the allocations only cover public open space and exclude domestic gardens like Middle Engine Pit, Caversham Drive.
- Suggest addition of two sites at Backwell a) park partly managed for wildlife adjacent to West Leigh Infants School and b) Field on east of West Leigh Infant School.
- The Old School field in Abbots Leigh and Brookside in Pill should be LGS, fulfilling important community functions.
- The creation of socially sustainable communities depends on well maintained shared open spaces which encourages social interaction of residents of all ages.
- Schedule 3 omits a number of open spaces in the Abbots Leigh, Ham Green, Pill and Easton-in-Gordano Neighbourhood Plan.
- Existing LGS areas in Backwell Parish are very important to the community
- Anything to support the environment and wildlife is a good thing.
- These areas revery important and need to be protected
- New areas also need to be designed.

Suggested amendments:

• I would rearrange the priorities. Beauty is a very subjective. Richness of wildlife should take precedent over accessibility.

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• None

Policy LP15: Preferred area for mineral working-land at Hyatts Wood Farm, south of Stancombe Quarry

A total of 5 comments were received against this policy. 1 objection, 2 Support with amendments, 2 support. Themes and issues which were raised were as follows:

Reasons for objecting:

• Policies LP 15 and LP16 propose extensions to two quarries within the vicinity of Barrows Court and its numerous designated heritage assets including its registered park and garden; also Freemans Farm (Grade II Listed Building). It isn't clear how these assets and their settings have been considered.

Reasons for support:

- Support the policy approach to facilitate the future supply of minerals.
- Additional conditions are required to seek an improvement to road conditions; there needs to be more stringent requirements/additional conditions set for washing quarry lorry wheels. The A370 at Flax Bourton is often muddy from lorries, especially after rain.
- Infrastructure needs to be available to support such sites. Not acceptable to have large lorries on small roads. Eg. lorries through Yatton and Congresbury to Yatton cement works have increased.
- For any discharge of water impact on surrounding water resources and water quality consideration will be needed.
- Any proposals to extend this quarry may require permits from the Environment Agency.

• Where any planning permissions are in place but are old and / or the site has not operated for several years, conditions should be reviewed and updated .

Suggested amendments:

None

Additional general themes and issues which were raised:

• None



Policy LP16: Area of Search for mineral working-land at Downside Farm, south of Freemans Quarry

A total of 5 comments were received against this policy. 2 objections, 2 support with amendments, 1 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- There is a carbon footprint in using quarry material; (embodied carbon in construction includes extracting the material)
- Quarries are brown field but there is no mention of using them for other uses as part of the strategy, instead of just leaving a hole in the ground with trees around it.
- Totally inappropriate to allow potential for more HGV traffic in this area, on poor quality local roads. If it proceeds road infrastructure improvement is needed in advance.
- No vehicles should be allowed to use Downside Road to reach the A370.
- Policies LP 15 and LP16 propose extensions to two quarries within the vicinity of Barrows Court and its numerous designated heritage assets including its registered park and garden; also Freemans Farm (Grade II Listed Building). It isn't clear how these assets and their settings have been considered

Reasons for support:

- Supportive in principle.
- Support the policy approach to facilitate the future supply of minerals.
- Downside Farm is within a sensitive aquifer needing a high level of protection. An Environmental Impact and Hydrogeological Risk Assessment will be required, and conditions or appropriate mitigation.
- Where any planning permissions are in place but are old and / or the site has not operated for several years, conditions should be reviewed and updated .
- Support the Justification (page 39] reference to the ceasing of extraction of limestone from this quarry, unless HGVs are prevented from using the B3130 and B3128 when there are sensible alternative routes.
- Support the Area of Search approach given the absence of a detailed geological investigation.

Suggested amendments:

• None

Additional general themes and issues which were raised:

None



Policy LP17: Minerals Safeguarding Area for carboniferous limestone

A total of three respondents commented on this policy, one objection, one supporting comment with amendments, and one supporting comment. Themes and issues which were raised were as follows:

Reasons for objecting:

- I see no safeguarding of the land, wildlife or residents.
- all 3 quarries in the north of North Somerset have been afforded exceptional rights of expansion, all near Backwell, significant for local traffic, noise; we will have extra heavy traffic through/ near the village. The quarrying close to residential areas can't go on ad infinitum.

Reasons for support:

- Support the need for a safeguarding policy to ensure mineral resources are adequately protected from non-mineral development unless there are exceptional circumstances.
- MSA seems too tightly drawn around the quarries and potential extensions and excludes the Downside Farm Area of Search. Certain types of development like residential close to the MSA could sterilise quarry development.

Suggested amendments:

• The MSA should be expanded to both include the Downside Farm Area of Search and an area 200 metres beyond the MSA as currently drawn.

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Additional general themes and issues which were raised:

None

