



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

Consultation Statement

Appendix 3: Summary of Responses to the Development Policies

August 2022

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This appendix provides an overall summary of responses to the Development 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 document or for each respondent.

Design and Place-making (DP1-DP12):

Policy DP1: High quality design

A total of 46 comments were received against this policy. Only 2% objections, 71% Support with amendments, 26% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- The policy is too prescriptive and cumbersome. It should be more focused with the written justification used for referencing

Reasons for support:

- Support but need to include acceptance that innovation and requirements of the site are not unduly inhibited by an overly prescriptive approach. This was the most common comment.
- New development should be encouraged to create green/blue infrastructure and maintain wildlife habitats, green corridors, green roofs.
- Water quality within the Source Protection Zone should not be adversely affected to avoid additional treatment to drinking water. These areas should be avoided or mitigation should be put in place to offset impacts for the lifetime of the development.
- Support but design review panels should have stronger emphasis, as they provide better outcomes than negotiation with planning officers.
- Agree with involving the local community in the design of new development however this is rarely done effectively and transparently in practice and should be improved.
- Support. Good criteria and includes long-term maintenance of shared facilities. Good focus on details and adherence to existing Residential Design Guidelines 1 – 4
- Support but the criteria need to be adhered to.

Suggested amendments:

- A number of comments related to the policy being too detailed and prescriptive. The NPPF, planning practice guidance and other frameworks already provide a common set of requirements that guide development. The council should avoid prescription/duplication at a local level. Much of this policy would be better placed in the supporting text to make the policy easier to use. Policy should be revised and concentrate on key aspects of high quality successful design for North Somerset referencing other national design guidance as necessary with more detail placed in the supporting text or SPD's.
- Support the aspirations however think they will be put aside should the authority not meet its housing targets.
- The policy needs a great deal of streamlining to avoid duplication with other policies and guidance.

- First bullet should be amended to state that the level of detail should be appropriate to the application type and stage.
- A positive policy is needed which supports Modern Methods of Construction (MMC)
- “The Council will encourage the development of housing using Modern Methods of Construction, including fully modular housing on all appropriate sites and locations.
- In order to guide the design and appearance of MMC housing from an early stage in the planning process, the Council will develop an MMC Housing Pattern Book and Design Code which will form the basis for preapplication discussions and community engagement. Developers of MMC Housing will be required to use the Pattern Book in formulating their development proposals.
- The Council will actively support the growth and development of the MMC housing manufacturing industry in North Somerset, in order to facilitate the delivery of housing in the area.”
- Third bullet point should include the words “where appropriate” at the end of the sentence. It will not always be appropriate or desirable to propose locally characteristic plot and building frontage widths as they may not be compatible with wider placemaking or other policy objectives (e.g. development densities, parking requirements etc.)
- At bullet 5 reference to Secured by Design should be placed in the written justification and not the policy.
- Seventh bullet point should be removed-already covered by other policies
- At bullet 8 this criterion relates to layouts and design features but is written out of context given that it refers to “the production of masterplans and design principles”. Such a requirement should be included within the written justification and the criterion reworded.
- Tenth bullet re views of approached to settlements needs qualification to specific important views creating a distinctive local arrival experience.
- Twelfth bullet relating to private amenity space is not sufficiently precise for decision making and should be amended or removed
- Final bullet re lighting schemes is not sufficiently precise as it implies any lighting is likely to be un satisfactory so is unreasonably onerous.
- At bullet 16 this criterion should be reworded so that there is clear reference given to the impact of light on biodiversity. It is unclear as to what level of mitigation could be acceptable to mitigate harm associated with lighting. Clarification is required.
- The requirement for Design and Access statements, parameter plans and community engagement statements are already covered within national and local validation requirements. The paragraph should be deleted.
- The policy should read where a Design Review Panel has made recommendations and is supportive, substantial weight should be given to this.
- The proposed policy as worded applies to ‘all proposals’ and we would welcome greater consideration of the needs of infrastructure development. By its nature it needs to be functional and considerations such as security and health and safety must take precedence over appearance. While we seek to ensure design is a sensitive to its location as possible, there are often constraints on location/siting (due to existing below ground infrastructure), materials (for example requirements to meet national security standards) and size/form (driven by operational requirements)

- Should include strict reference to developer commitment to carbon neutrality, with NSC enforcement of this. Solar panels and wind turbines should be considered.
- Should refer to the additional protection needed for buildings in conservation areas.
- Support but would welcome additional reference to local food growing opportunities such as mini allotments or fruit trees to help residents engage with nature and improve wellbeing.
- Should expand policy to state that all gardens should be designed to be nature and wildlife friendly i.e hedges, herbaceous borders woodland plants. Fencing should be resisted but and where necessary but wildlife friendly with gaps beneath. This will counter habitat loss, reduce climate change and help manage ground water runoff.

Additional general themes and issues which were raised:

- Design and access statements are often inadequate. They should give sufficient detail and outputs of assessment tools for the purposes of consultation which should be done early in the process.
- Should emphasis the application of good design within existing communities.
- All new dwellings should be insulated to the highest possible standards and be fitted with PV panels.
- Biodiversity net gain should be incorporated into all new developments.
- The preservation and creation of hedges and other green corridors is very important.
- Need more design expertise in planning departments or engagement of architectural consultants.

Policy DP2: Residential development within settlement boundaries

A total of 17 comments were received against this policy. 4 objections, 6 Support with amendments, 7 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- The policy wording "The plot sizes of both the new and existing property are in keeping with nearby properties" is unnecessary and can only help to re-enforce social divisions.
- The methodology for drawing settlement boundaries should be published and drawn to include potential for sustainable infilling to contribute to housing supply
- Need to move towards more sustainable building materials such as wood rather than concentrate on design

Reasons for support:

- None given

Suggested amendments:

- Should prioritise homes for single person households and ensure they are built to sustainable construction standards.
- Remove cars from developments by creating green transport hubs within each community.
- Remove any need to slavishly copy existing styles and finishes as this can stifle innovation and produce boring clone buildings.
- Should amend to allow small scale housing adjoining settlements in sustainable locations
- There needs to be additional conditioning with regard to Air B'n'B type properties and “party houses” to prevent them from adversely affecting a neighbourhood.
- Increased density with ever smaller gardens is a danger in villages and changes local character.
- Should cross refer to good design policy in DP1

Additional general themes and issues which were raised:

- Important to adhere to the Local Plan design policies
- Residential infilling within the settlement boundary is not appropriate at Rodney Road Backwell due to narrow road and danger to school children during the construction phase. Also environmental damage to fields.

Policy DP3: Residential extensions

A total of 13 comments were received against this policy. 1 objection, 5 Support with amendments, 7 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Agree with many of the 'green' aspirations in the plan, but feel that the proposals for Backwell fail to comply.

Reasons for support:

- None given

Suggested amendments:

- There needs to be additional conditioning with regard to Air B'n'B type properties and “party houses” to prevent them from adversely affecting a neighbourhood.
- Should cross refer to the design standards set out in DP1
- No mention of conservation areas
- Residential extensions should not erode the parking standards applied to the original building. Extensions into garages can result in more on-street parking and damage to the neighbourhood environment

Additional general themes and issues which were raised:

- Planning officers don't always have the necessary design expertise to deal with the great variety of house styles in North Somerset so subjective design opinions can lead to long delays in the planning application process.
-

Policy DP4: Houses in multiple occupation

A total of 11 comments were received against this policy. 1 objection, 3 Support with amendments, 7 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Policy is too welcoming of HMO's

Reasons for support:

- None given

Suggested amendments:

- This policy needs to define what constitutes a 'satisfactory standard of living conditions' and an 'unacceptable' change in the balance of property types. This is too vague and wouldn't provide any certainty for applicants.
- Should only be permitted where there is access to local facilities and public transport.

Additional general themes and issues which were raised:

- None raised
-

Policy DP5: Climate adaptation and resilience

A total of 71 comments were received against this policy. 41% objections, 41% Support with amendments, 18% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- The need for a specific climate change adaptation statement is not considered justified.
- Climate change is a cross-cutting issue and issues identified to be included within the statement will be dealt with in other reports. Duplication must be avoided.

- Should be environmental net gain, not biodiversity net gain, as BNG could lead to habitat fragmentation.
- Objectives should not undermine the delivery of viable development – flexibility must be embedded into policy.

Reasons for support:

- This policy has the biggest long-term impact, all others should be subservient to it. But perhaps the requirement is by voluntary pledges initially?
- Climate change adaptation statement should be provided at first application stage.
- The approach to demonstrate vulnerability to climate change is welcomed. Consideration should be given to adopt standards set out in RIBA 2030 project and promotion of water efficiency measures.
- Overall objectives are supported which support delivery of carbon neutrality by 2030.
- This sets out how to deal with the climate emergency, which is to be supported. Innovative methods should be considered and encouraged.
- Developments should be required to protect local food production.
- Support all genuine attempts to retain valued landscape and wildlife habitats, enhance biodiversity and achieve net zero.
- Pleased that Green Infrastructure and nature-based solutions are recognised. Nature-based solutions should form requirements of other relevant policies as these are one of most cost-effective approaches to mitigating/ adapting to climate change.
- Support policy, as will ensure that climate change resilience and adaptation measures are considered from the outset of designing development proposals.

Suggested amendments:

- Should certain types of development be exempt? i.e. householder extensions, alterations.
- Amend policy wording as follows: '*Consider whether construction materials used are suitable for the lifetime of the development, and whether all or elements of building construction could be undertaken using Modern Methods of Construction (MMC)*';
- Need to integrate carbon sequestration by wetlands and peat into this policy.
- Remove the requirement to '*protect existing...biodiversity*' too onerous and imprecise.
- Include keeping light pollution to a minimum in rural areas, particularly the AONB.
- Second bullet should read DP9, not DM9.
- Include reference to the WoE Nature Partnerships Nature Recovery Network (NRN) – use a diverse range of native species and suitable habitat restoration/ creation to suit the local area.
- First paragraph should explicitly say that demonstration of vulnerability to climate change should be to the satisfaction of the council. Reference to cumulative impacts should be in the policy.
- Further recognition would be helpful in relation to the potential of market gardening, orchard development and small-scale farming.
- Plant mature trees near flood plains.

- Recommend that a statement on how people's access to biodiverse green space and spaces for wildlife has been taken into account in development.

Additional general themes and issues which were raised:

- How will BNG be assessed and validated?
- Some comments welcomed the development of an SPD, whereas others considered that it was not appropriate to defer fundamental aspects and detail to an SPD. The policy should be developed further to cover all requirements. provide the detail in policy and annex as required
- Large-scale housing at Backwell will negatively impact the ability and wider society to adapt to long term climate change. Losing agricultural land, ancient orchards, SSSI, increased emissions from travel.

Policy DP6: Net Zero construction

A total of 61 comments were received against this policy. 32% objections, 41% Support with amendments, 27% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- This policy does not address the impact of infrastructure construction necessary to support housing. The transport study notes those options which are 'likely highest carbon construction.'
- Limited justification for transposing requirements addressed via the nationally prescribed Building Regulations (BR) into planning policies.
- BR is more flexible than the planning system.
- BR avoids individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for manufacturers, suppliers and developers.
- Additional or alternative standards at a local level will cause confusion and uncertainty for developers wanting to bring forward schemes.
- Standards over and above BR, should be required only if they address a clearly evidenced locally occurring need, justified by locally specific data and where their impact on viability has been considered.
- Policy should be consistent with the national policy approach set out currently by the Written Ministerial Statement from March 2015.
- Higher levels of energy efficiency for new homes are set out in the 2021 Part L Interim Uplift. Includes provisions for low carbon heating systems and heat pumps as primary heating technology. The interim uplift will encourage homes that are future proofed for the longer term.
- The housing industry is moving towards zero-carbon housing as standard, but the transitional arrangements are in place to ensure that this can be done smoothly.
- The proposed requirement to achieve net zero operational energy compliance now in respect of both regulated and unregulated energy, will affect viability and stifle the supply of affordable homes.

- LETI design guide is referenced. This standard is highly regarded, however there are concerns with the suitability of the application of the LETI energy use intensity targets and space heating demand standards outside of a high-density urban setting. May be issues with deliverability outside of London?
- A full evidence base and consideration of viability will need to be provided and consulted on as part of the emerging local plan. Appropriate uplift to build costs for delivering net zero embodied carbon should be allowed for in the forthcoming Viability Assessment.
- Whilst greater levels of sustainable construction are supported in principle, in the context of the significant housing requirement, this cannot be to be the detriment of delivery in the short-term.
- Do not consider that a North Somerset-wide zero carbon homes standard would be achievable or deliverable in the short term.
- The proposed 5-year reporting requirement for commercial premises will impose an unacceptable additional burden on businesses and will be difficult to implement.
- Need to provide evidence demonstrating a clear local need for the water consumption requirement. Should not adopt a standard beyond the optional standard of 110L, as stated within the NPPG.
- The Plan should recognise the difficulty in meeting the carbon neutral objectives on strategic sites, such as Locking Parklands which are partially constrained.

Reasons for support:

- Enthusiastic support for the commitment to, and definition of net-zero operational standards for both residential and non-residential buildings.
- Vitally important that all new homes are built to the highest specifications of insulation and energy efficiency and include energy generation methods.
- Must insist that all new buildings are Net Zero Carbon now, 2030 is too late.
- NSC needs to be a leader. People will leap at the chance to buy into a carbon neutral development.
- Planning clearly has a role to play to support renewable energy generation. Welcome the policy support for on-site renewables.
- Agree that overheating needs to be a consideration in the design of all new buildings. Overheating assessments should be consistent with CIBSE TM59.
- Ideally the Passivhaus standard should be adopted as the norm.
- Welcome the proposal to minimise the potable water use with estimated consumption of no more than 100 ltr/person/day, recommend RIBA 2030 standards are adopted.
- Planning consents for the development and renovation of existing buildings should require similar energy efficiency and energy generation standards as far as reasonably practicable.
- Support the approach to ensure that all development follow the principles of the energy hierarchy.
- The policy should promote standards to help support the supply chain transition to a net zero carbon standard, in advance of the 2025 building regulation requirements.

Suggested amendments:

- Flexibility needs to be embedded, as it may not be feasible from a locational, technical or viability perspective.
- Unclear as to whether there is a mandatory requirement to achieve net zero from the point of adoption of the Local Plan, or whether this requirement will be 'stepped' in line with Government targets?
- Does this policy now require 100% of energy demand to be met through renewables? Clarify "*On-site renewable energy generation is maximised, equivalent to at least the on-site energy demand*"
- Something needs to be in the policy regarding heating and hot water systems and how the electricity they need will be generated.

Additional general themes and issues which were raised:

- Promote the use of thermal assessment testing, to address the performance gap within new homes and ensure that the building has been constructed in accordance with the designed standards.
- Why is this policy so detailed when the rest of the document is more "broad brush"?
- Energy statements need to contain full details of the design assessment methods and include the calculation inputs and data to allow verification.
- Not appropriate to defer fundamental aspects of an important policy to a supplementary document. Vitaly important this is prepared and released for comment as soon as possible. Very important to engage with promoters and developers on this.
- The LA could engage in development of 'microgrids' using excess generation from local developments to provide energy resilience and reduce load from the national grid.
- Holistic approach is required when assessing proposals for demolition of existing buildings. Consider where materials can be repurposed or re-used, for example using existing masonry as hardstanding for roads and foundations, reducing the requirement for additional construction materials.
- Support retention of existing buildings, but this may not be the best solution. Sub-standard building type, ineffective layout of the existing scheme may cause occupational issues. Must consider the desire to maximise density.

Policy DP7: Large scale renewable energy generation

A total of 34 comments were received against this policy. 5 objections, 18 Support with amendments, 12 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- The solar Search Areas identified need revision as cover areas which are clearly not suitable for solar PV development. Support instead solar on rooftops or car park canopies, for example.

- Avoid new generation in the Mendip Hills AONB or in areas that will impact on its special qualities or views in or out. No wind turbines on the hills, but offshore instead
- Do not support Search Areas close/adjacent to the Severn Estuary SSSI, SPA and Ramsar site. Tickenham, Nailsea and Kenn Moors, Biddle Street Yatton, Puxton Moor, Weston Moor are 'functionally linked' to the Severn Estuary bird population. They Impacts on designated sites can result from renewable energy development outside the designated site boundary - for example wind turbines can present collision and displacement risks to mobile species such as birds and bats.
- Opposed to onshore wind turbines and large scale solar, especially in SSSIs.
- More technical detail is required. Grid capacity and landscape sensitivity should be considered.
- The energy losses that occur during the distribution of heat from a heat network make them difficult to justify under the current drive to reduce energy use. Should not encourage the connection of new highly efficient developments to potential heat networks.

Reasons for support:

- Welcomes the policy increasing Search Areas for solar and wind installations, providing opportunity for local, community-led generation schemes to be brought forward.
- Support all initiatives to find a strategic approach to identifying the most sustainable locations/ identifying proposed Search Areas for renewable energy generation. Principle of wind turbines and solar PV panels is supported.
- Welcome use of agricultural (e.g. crop waste and animal waste) and other waste to create bioenergy (especially via anaerobic digestion), given its potential in reducing the need for artificial fertilizers in agriculture.
- All houses, farm buildings and warehouses should be equipped for solar energy harvesting.
- North Somerset has the potential to show the rest of the country that sustainable long term renewable energy is both possible and desirable.
- A great step forwards but must be aware of certain constraints.

Suggested amendments:

- No mention of harnessing tidal energy. Use of local tidal and river flow must be examined.
- Landscape sensitivity must be taken into account and guides the design and scale of all stand-alone renewable energy installations.
- Should include relevant policies and criteria against which individual schemes are assessed. This should include reference to designated heritage assets, as any effects on their setting and significance is a material consideration in the planning process.
- Bioenergy/biomass should only be approved if are shown to be using agricultural or other waste, or sustainable wood. Not approved if fueled with crops grown specifically for bioenergy, unless shown have a positive impact on biodiversity and not impact on food production.
- Provide guidance on any mitigation requirements needed to protect national and international designated sites, informed by the HRA/AA.
- Explain the term private wire – add to Glossary, change to

- Welcome a more focused study which provides greater certainty about which areas would be acceptable in principle.
- Must be adjusted to remove existing designated sites, nature reserves, priority habitats and other key areas for nature's recovery, as it would be unacceptable for action to address the climate emergency to worsen the ecological emergency.
- The Gordano Valley should be safeguarded for nature.
- Do not support Search Areas on areas of peat soils (construction of turbines in areas of deep peat could release large amounts of carbon), sensitive wildlife areas and a SSSI in North Somerset (Tickenham, Nailsea and Kenn Moor) and other protected sites should not be included.
- Several wind and solar areas located are within or in the setting of the Mendip Hills AONB. Major development is permitted within them only in exceptional circumstances and where it is in the public interest.
- Some renewable energy technologies have the potential to cause serious damage to irreplaceable historic sites. Include a specific condition to ensure harm to the significance of heritage assets and their settings is avoided.
- Consultation with neighbouring LPAs required when Search Areas identified on authority boundaries.
- Some comments suggest that areas in Royal Portbury Dock estate identified as suitable only for wind turbines below 250kW would in fact be suitable for significantly larger turbines. But some have said that areas around the Dock, extending up the Avon estuary may be unsuitable for wind turbines, due to the bird risk.
- Remove the requirement for storage systems on all systems greater than 1MW as this would at present make some projects financially unviable, especially for community groups.
- Mapping appears to acknowledge that only the 'extent' of affected designated heritage assets has been considered in the assessment and not the assets setting.

Additional general themes and issues which were raised:

- Bladeless and other alternative designs for turbines should be considered to reduce adverse effects.
- Encourage a policy regarding solar developments and biodiversity for North Somerset.

Policy DP8: Efficient use of land

A total of 40 comments were received against this policy. 55% (22) objections, 27% (11) support with amendments, 17% (7) support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Minimum density requirements are too blunt and don't allow the merits of individual sites to be taken into consideration and created conflicts within the plan

re vision for more diversity and choice. Rather than seeking to establish fixed density ranges through the plan, recommend the authority instead encourage efficient use of land where it is appropriate to do so and in the context of the five considerations specified under paragraph 124 of the Framework.

- Densities in rural housing developments should be lower than 40 dwellings per ha (suggest not greater than 30/ha) in order to preserve the character and settings of villages and prevent soulless remote dormitory estates which give rise to further, unplanned issues
- The need to maximise the use of land is not disputed this must be balanced against other issues, such as local character, market demand and site constraints.
- More flexible approach to density is needed which allows development to reflect local character, site constraints and market requirements and is therefore compatible with DP1 and SP4
- There is no need to reference "...density should respect and complement the character of the surrounding area", as this is unnecessary duplication and covered in design policies

Reasons for support:

- Support the allocation of sites to the larger towns predominately, the requirement to reuse previously developed land, and also to make best use of that land through an appropriate level of housing density.
- Support the need to respect and complement the character of the surrounding area.
- Support the approach and policy wording especially in relation to Old Mill Road in Portishead
- Will help minimize the impact of development on the environment and other land use, but must ensure occupants have access to high quality, biodiverse green and blue space nearby.

Suggested amendments:

- Should be a recognition that certain phases of development may fall below 40 dph where existing constraints such as trees preclude higher densities
- Support the policy but don't see how a new village at Yanley is an effective use of land. More urbanised development inside the ring road would better fit the policy requirements
- Higher density development is likely to result in more people using existing open and green space (alongside other services), which could put additional pressures on these limited resources. It will be essential therefore that new development is delivered alongside high-quality green space and green infrastructure to ensure there is access to nature for existing and new communities to achieve truly sustainable places.
- To deliver over the 15-year period it is imperative that the Council seeks to maximise housing numbers on proposed sites for housing development.
- Should be amended to 30dph to allow adequate space for homeworking, outdoor private space, additional car parking to a private garage.
- Allotment space should be taken into account in densities.

- Council needs to demonstrate how 40 dph can be achieved when they require high parking standards, biodiversity net gain and 5-10m landscaped buffers for bat corridors as a routine requirement.
- A blanket minimum target density should be replaced with recognition that the location, settling and constraints play a big part and that in rural areas and edge of settlements this may not be appropriate. Focus should be on design rather than density.
- A range of densities between 25 and 40 dwellings is more appropriate. Won't achieve aspirations for alternative on-site power generation, space for landscape (DP34), flexible future use and accessible homes (DP44) at 40dph.

Additional general themes and issues which were raised:

- Surface and foul water drainage requirements will need to be considered for brownfield sites in line with Wessex Waters policies.

Policy DP9: Flood risk

A total of 23 comments were received against this policy. 6 objections, 9 support with amendments, 8 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- This policy requires complete rewording as it presents more justification than policy. Not all development must consider its vulnerability to flooding. Further, not all development must provide evidence where it lies within Flood Zone 1.
- Putting a large amount of concrete on low-lying agricultural land that often has standing water during the winter months is likely to increase the risk of local flooding especially along Backwell Common by the proposed East Backwell site. (This is more of an objection to the allocation of land in this area so will be considered in that context also).
- Another similar comment as follows: Referring to the government flood risk map (<https://check-long-term-flood-risk.service.gov.uk/>), it is very obvious that where there is urbanization (i.e. roads, houses), there is risk of flood. The map shows medium risk of flooding on Backwell Common between The Avenue and Rose Cottage. It is common knowledge that we will face more adverse weather in the future and flooding will occur more often and with more damage. Therefore, it is expected that Backwell Common will move from Medium Risk to High Risk. Building thousand of houses in the area will accelerate the risk

Reasons for support:

- Parklands Village comment: any future residential proposals on sites such as Site B and the former Leisure Dome allocation will be treated as per the existing consents (in terms of passing sequential test requirements) on the wider Parklands Village which also fall within the same flood risk areas.

- Churchill PC support this policy but requests that more engagement with Churchill Parish Council and with other Parish councils, on flood risk to use local knowledge in decision-making.

Suggested amendments:

- We consider the policy would be strengthened by including a requirement for new development to incorporate nature-based solutions and green infrastructure when addressing flood risk, recognising this would provide other eco-system services and benefits for people and wildlife.
- The draft policy requires re-drafting so to reflect accurately national flood risk policy.
- Congresbury is at risk of flooding and any new developments within the catchment have the ability to make this worse either from fluvial, tidal or surface water flooding. While the requirement for SUDs has been made throughout the document, we are concerned that developers are ticking the box with incorporation of attenuation ponds that may pose a risk to people's safety or degrade the local environment. Long term management plans should be required as developers will build and forget the need for maintenance. This increases the risk of flooding for local residents.

Additional general themes and issues which were raised:

- Benefits of considering historic flooding incidents e.g., 1968. North Somerset has experienced dry conditions recently, but a similar flood event could take place, causing significant damage. This would be especially the case in the ground was saturated (rainfall recharge rejection risk)
- Do not build on floodplain or in Flood Zones 2 and 3, or near to main rivers.
- A Sequential Approach must be followed within development design and layouts.
- Development must consider climate change and apply the latest allowances from gov.uk within Flood Risk Assessment's.
- if a third of North Somerset is at 'high risk' of flooding why are we not contesting the algorithm about 20,000 needed if we haven't got the appropriate land to build on?
- The policy should apply to new travel/transport infrastructure, not only construction of buildings
- Concern whether a proper assessment on the field abutting Rushmoor Lane in Backwell has been undertaken. There is a drain within the boundaries of the field and it regularly floods. This is a concern as you would be talking about overhauling most of the drainage system around Rushmoor Lane/Grove as part of the changes to the infrastructure for that part of the development (which does not seem proportionate).

Policy DP10: Sustainable drainage

A total of 14 comments were received against this policy. No objections, 5 support with amendments, 9 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- None

Reasons for support:

- SuDS techniques are varied, like swales, attenuation ponds and green roofs, and should include many multi-functional benefits. It is important to consider management and maintenance of all SuDS.
- The Council as Lead Local Flood Authority should advise on SuDS
- A Flood Risk Activity Permit (FRAP) is likely to be required plus any planning approval for work in or near watercourses.
- Water Framework Directive requirements need to be considered.
- Locking Parklands' drainage strategy was agreed through discharged planning conditions, so existing agreed strategies (including the Weston area strategic drainage strategy) should be recognised in applying new policies.
- Some SUDS schemes have been poor in past; the Plan should seek higher standards in all new development.
- I support the use of SuDS but fail to see how building the Banwell Bypass and houses across a flood plain would support this.
- Policy DP10 is supported; it follows a widely applied approach for developments to deal with surface water drainage, and promotes SuDS, including integration into green infrastructure.
- Where there is no other option, only surface water disposal of rainwater from impermeable surfaces into a dedicated public surface water sewer, not to the foul systems, could be considered.
- Support policy but request more engagement with Churchill, and other Parish councils, on flood risk to use local knowledge in decision-making.
- Support the various tests and criteria to be applied.
- Flooding and high water table make land east of Backwell a difficult and expensive location for any development; this has not been adequately examined.
- Support the integration of SuDS into new (and existing) developments, important in reducing impact on water quality while also providing green infrastructure.
- Support the need for run-off from all hard surfaces to receive an appropriate level of treatment in line with SuDS guidelines, SUDS Manual (CIRIA C753), to minimise risk of pollution.

Suggested amendments:

- Please refer to water quality within this policy, as follows:
Water is seen as a resource and is reused where practicable, water quality is protected/improved, offsetting potable water demand, and that a water sensitive approach is taken to the design of the development.

- Require surface water management features to be multi-functional in all circumstances, not 'wherever possible'.
- The policy could add that alternative means of surface water disposal (e.g. SUDS, natural watercourse, highway drains) must be properly investigated before connection to a public sewer will be considered.

Additional general themes and issues which were raised:

- None

Policy DP11: Rivers, watercourses and springs

A total of 9 comments were received against this policy. No objections, 5 support with amendments, 4 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- None

Reasons for support:

- Support the criteria demanded.
- Establish 5-10 metre buffer strips along all watercourses for wildlife, and support Natural Flood Management , leaving woody debris/slowing the flow within river channels to reduce flood risk downstream.
- Where rhynes need to be maintained, ensure it's out of breeding season and no damage to banks, to protect district's threatened water vole populations from poor river/rhyme management.
- Insensitive management for biodiversity has damaged the special character of the Levels and Moors in district. Water levels in ditches must be maintained at adequate levels throughout year. Poor water quality is a serious threat, worsened by low water levels.
- Climate change has impacted rainfall predictions; water levels in dry periods can be insufficient to sustain aquatic wildlife. Trees along watercourses could be helping address climate change/flooding, and aid enhancement of wildlife corridors.
- Policy could be more ambitious and make explicit the need to adopt a natural flood management approach to reduce flood risk and benefit biodiversity; eg. raise water levels on the moors to restore coastal floodplain grazing marsh, re-wet peat, and create vital inland wetland and foraging habitat for Severn Estuary birds.
- Allowing more space for water has the added benefit of reducing the amount of management and intervention by the EA and drainage board for 'conveyance', which would reduce costs and benefit wildlife.
- Concerned that development could overwhelm local water courses and increase pollution.
- Watercourses should have water clean enough for bathing.

- Support the need for developments to demonstrate a positive contribution to the health of river environments and re-naturalisation, which can also benefit local residents.

Suggested amendments:

- The Justification statement needs to give a balanced view: the system was designed not only for drainage but irrigation.
- Policy could make explicit the need to adopt a natural flood management approach to reduce flood risk and benefit biodiversity.

Additional general themes and issues which were raised:

- None

Policy DM12: Development in the Green Belt

A total of 24 comments were received against this policy. 10 objections, 6 support with amendments, 8 support. Themes and issues which were raised were as follows:

Reasons for objecting:

Some of the following comments repeat objections raised to the strategic policies, and strategic locations and LP8, the extent of the Green Belt.

- Object to release, east of Backwell.
- The principle of moving a settlement boundary to encompass a parcel of land thus removing it from the GB so that development can proceed is unacceptable.
- Villages should not have an inset introduced when washed over with GB. It is a blatant attempt to circumvent the fundamental purpose of preventing urban sprawl and to assist in safeguarding the countryside from encroachment.
- Part of Wraxall needs to be an inset village.
- 'Limited infilling in villages' is contrary to the NPPF definition and does not reflect the Julian Wood ruling.
- The policy is overly complicated. Policy DP12 doubles up as another design policy with references made to form and siting. There is no requirement for this policy to reference design in this instance.
- The material change of use from agricultural to equestrian is inappropriate.
- Policy duplicates National Policy and is not necessary. Villages in the Green Belt with a railway station should be allowed to expand within 10 mins walk of the station.
- "Infilling" is not defined. Suggest that a prescriptive approach be included for "Permitted development rights" re. "Extensions, replacement buildings and out-buildings and specifically building height" which would be beneficial to help preserve the character of settlements.
- Exceptional developments within the Green Belt should be given preferential planning support when they are community-led (land trust or not-for-profit objectives), Passivhaus or similarly accreditable zero-carbon buildings, with residents

working in agro-ecological (woodland or agricultural), social, health or educational work locally.

Reasons for support:

- Support but question why very special circumstances should be needed for renewable energy.
- Support the significance afforded to light obtrusion and 'sky-glow'.
- Approve the policy continuing to set out criteria for development/extensions and changes of use.
- Wish to restrict any development in the GB as much as possible to preserve the identity of settlements within the district
- Agree with infill within settlement boundaries.

Suggested amendments:

- Note that change of use from agricultural to equestrian use would not be regarded as inappropriate provided it preserves the openness of the Green Belt and does not conflict with the purposes. We would like this aspect of the policy to address the future use of approved equestrian use when it no longer is required.
- Limited affordable housing adjacent to existing settlements should be permitted.
- The policy should not be so restrictive about renewable energy projects. Areas adjacent to settlement boundaries may be very suitable for appropriate renewable projects e.g., solar.

Additional general themes and issues which were raised:

- Wrong some individuals benefit from the sale of Green Belt land.
- LP2 development seem to go against these principles.
- Note 'the overall aim of Green Belt policy is to preserve the openness of the Green Belt in terms of its spatial and visual aspects'. I hope this is to be the primary consideration in relation to any proposal for the erection of a wind turbine.
- Concerned about the significance of wind turbine search areas shown on the map, how will location for these potentially disruptive machines be decided?
- Policies need to be read in conjunction with DP42 which sets out provisions for rural exception sites for affordable housing meeting local needs and with local community support.

Transport (DP13-DP19):

Policy DP13: Highway safety, traffic and provision of infrastructure associated with development

A total of 27 comments were received against this policy. 6 objections, 15 Support with amendments, 6 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Lack of evidence, more needs to be done to understand traffic flows, behaviours and patterns
- Mitigation measures too narrowly scoped and could cause congestion elsewhere on the network, funds should be sought to deal with consequential issues in other places

Reasons for support:

- Support the emphasis on provision prior to commencement of any development
- Encourage developers to deliver public transport improvements
- Supportive of the principle that planning permission should be refused if there is a detrimental impact on rural areas or networks of country lanes

Suggested amendments:

- Request from National Highways to amend the policy wording from “development likely to have a severe residual cumulative impact on traffic congestion” to “severe residual cumulative transport impacts”, so it can refer to other topics such as safety issues or impacts on particular users.
- In the first paragraph of the justification text National Highways suggests revising to read “proposals with the potential for significant impacts on the M5”.
- The third paragraph of the justification text refers to “maintain[ing] overall road traffic at the otherwise expected level” but it is not clear how this level is to be set or calculated.
- Suggestion that the policy text should make reference to the Infrastructure Delivery Plan
- Suggestion that policy should clarify what mitigation measures are adequate and how these would be evaluated, particularly in respect of villages
- Request for further clarification on the justification and intent of potential requirements for mitigation of impacts on the M5, as such works will need to be appropriately referenced within the IDP and proportionate to the scale of the impact
- Suggest it would be helpful for the policy to refer to adverse impacts other than congestion, such as pollution and noise

Additional general themes and issues which were raised:

- Multiple comments about how infrastructure must be planned in step with development and should be constructed with or ahead of occupations
- Concern that mature trees and hedgerows can be lost to transport mitigation schemes
- Lack of safe walking and cycling routes, particular references to Hutton and Weston-super-Mare
- References to volume of traffic in rural areas such as Churchill and Abbots Leigh
- Specific comments on AECOM Transport Assessment, in relation to a) Wolverhill Road proposals increasing the distance residents will need to travel and b) bus routes beyond the North Somerset boundary
- References to development in Nailsea and concerns about roads local to Tickenham such as the B3130 and B3128 and the A370 through Backwell
- Concerns regarding traffic congestion in Portbury, including a petition from local residents submitted
- General support for policy, but skepticism about delivery
- Comments regarding rat-running, in particular traffic travelling through Backwell towards Bristol Airport

Policy DP14: Active and sustainable transport

A total of 37 comments were received against this policy. 16% objections, 35% support with amendments, 48% support. Themes and issues which were raised were as follows:

Reasons for objecting:

- The cost of incorporating electric charge points and upgrading the existing network should be incorporated into the Councils viability testing.
- No detail of how active travel could actually be achieved in Backwell in practice. Transport Hub at the station will worsen traffic along station road. Fear that individual housing developments won't contribute to transport infrastructure in a co-ordinated way.

Reasons for support:

- General support for improvements to and opportunities for active travel

Suggested amendments:

- DP14 should be amended to include equestrians. Local Plan should include equestrians as vulnerable road users long with pedestrians and road cyclists and horse riders should be included in the active travel strategy and included in any shared-use routes, wherever possible.
- Requirement for electric vehicle parking is superfluous as of June 2022 as part S of the building regulations will require EVCP in residential developments. Should be removed from policy.

- 5.9.5. “Opportunities to improve provision of or access to public transport, in rural and urban areas may be required to mitigate the impacts of the proposed development and facilitate the use of sustainable transport options.” CPC suggests that ‘Urban’ and ‘Rural’ are separated for this part of Policy DP14. For rural areas, ‘may be required’ to be replaced with ‘will be required’.
- Would like to see piloting of green transport hubs within each 20 minute community. Would be connected to bus stop or rail station. Have EV charging points giving residents somewhere safe and weatherproof to wait for transport. Could also locate rubbish/recycling and online delivery pick up points.
- The approach of the Highways Authority in imposing arbitrary 5.5m standard minimum carriageway widths for local access and minor roads is at odds with the aspirations of DP14 and manual for streets 1 and 2, as are the Councils Parking Standards. DP14 should be amended to allow its practical implementation.
- The references to road transport gas emissions should be included in the policy, not just the reasoned justification.
- Should include a reference to improving active travel in existing communities, including public rights of way, provision of EV charging points.
- Should include detailed plans for how active travel will be funded, also in existing communities.

Additional general themes and issues which were raised:

- The volume and speed of traffic in Churchill and Langford discourages active travel
- Development at the Vale (Easton-in-Gordano) would minimize the need to travel.
- Local Plan should seek to improve the reliability, frequency and cost of public transport. Recent cuts to services and pricing structure don’t help promote public transport.
- Better public transport is needed in Portishead because of the topography
- Concern about the capacity of the existing electricity network to support electric car charging
- More work is needed to encourage the public away from private car use, once the temporary subsidy for bus services from developer contributions ceases.
- Won’t be able to achieve a shift to active travel in Backwell.
- DP14 will not overcome the environmental shortcomings of a plan which would be more sustainable if development was allocated in Failand. The sustainable transport corridor previously consulted upon should be revisited.
- Don’t support car free country lanes.
- Need to accept that car journeys (for heavy shopping etc) will still be necessary. Restricting parking provision isn’t the answer.

Policy DP15: Active travel routes

A total of 36 comments were received against this policy. 6 objections, 18 Support with amendments, 12 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Policy is confusing and not clear
- Specific reference to the scope and effect of the policy imposing restrictions on land in the Port's control
- Multiple objections to specific cycle route through Prior's Wood in Portbury to the Clevedon Road - B3128 as this is a nature reserve and the paths are muddy and narrow and cyclists would cause safety issues for pedestrians and dog walkers

Reasons for support:

- Improvements to active travel routes welcomed
- Supportive of the safeguarding of existing routes and making new routes a mandatory requirement of new development
- Welcome improvements around Easton-in-Gordano, especially the routes to St Katherine's school

Suggested amendments:

- Specific point regarding how the proposed cycleway and footpath along the former railway line linking Congresbury with Blagdon would be very valuable, and concerns that part of the route is now in private ownership.
- Detailed points raised about the route in Portishead 'Path alongside 'the drain'' – request from local residents that a permanent pathway is created alongside the ditch as at present the route is impassable in winter. Map appended to consultation response.
- Comments on the 'Bristol Road verges' area of Portishead, regarding highway safety as users must cross the road to continue on the footpath outside Portishead Town Football Club. Suggest a permanent footpath should be considered.
- Suggest in the third paragraph after "pedestrians" the following should be added "*, including those who mobility aids*" to include those who use wheelchairs.
- Response from National Trust - as custodians of Tynesfield, we would like to flag an additional 'active travel route' - the bridleway heading north from Festival Way (between Backwell Green and Flax Bourton) to the B3130 Clevedon Road, which runs alongside the southern edge of the Tynesfield parkland. This route provides an active travel link to Tynesfield from Festival Way
- Request from Nailsea Town Council to extended the Festival Way linking Bristol to Nailsea further to the West of Millennium Park towards Clevedon and then on towards Weston-super-Mare in line with the plans being developed by Sustrans.
- Requests from both Burrington Parish Council and local landowners to delete the '*Congresbury/Churchill/Wrington/Burrington/Blagdon – route of former railway path avoiding B3133/A368*' route, as this is not a public right of way, most of it is in private ownership and it is not feasible to be considered as an active travel route
- Active travel routes on The Beach and Hill Road, Clevedon are not included

- The plan does not include the route through Gordano Valley connecting Clevedon and Portishead with a footpath /cycleway. This would utilise the route of the WC&P railway as much as possible.
- Request for additional route for walkers and cyclists through Stock Lane B3133 as currently it is very dangerous for any walkers or students from the university if they wish to walk along that road. It is also very dangerous for persons with prams/pushchairs or people with disabilities.

Additional general themes and issues which were raised:

- Further information is requested for the following potential active travel routes, as Figure 3-10 Nailsea and Backwell – Proposed Cycling Plan has been omitted from the Stage 4 and 5 Transport Assessment and there is no apparent statement in the West of England Local Cycling and Walking Infrastructure Plan 2020-2036: Nailsea to Wraxall, Tyntesfield link to Portbury Lane, Nailsea and Backwell proposed cycling plan.
- To encourage cyclists to commute to work journey times should be as fast as possible, and bike routes should be separated from pedestrian lanes.
- Concerns that insufficient routes have been identified in Portishead, with no routes proposed in the North or West of the parish
- Comments regarding the surfacing of routes, to ensure they are suitable in all weather
- The British Horse Society would like to be involved regarding the choice of surface and any issues around the WCHAR process in any routes to ensure that equestrians can be accommodated on Active Travel routes in accordance with LTN 120.
- Concerns from pedestrians regarding safety when sharing routes with cyclists
- Quality of routes and clear signage is an important factor in encouraging people to walk and cycle
- Comments regarding how these schemes will be delivered and how funding is secured
- Reducing speed limits on lanes will make it safer for people to walk
- Policy states that these routes should be designed for cyclists, pedestrians and horse riders where possible, however not all routes will be suitable for horses.

Policy DP16: Public transport accessibility

A total of 20 comments were received against this policy. 1 objection, 7 support with amendments, 12 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Unrealistic to promote growth at Backwell as the train station is not accessible

Reasons for support:

- Hopeful that the policy will be implemented taking into account appropriate journey lengths and timetabling

- Support the requirement that all new development should be within reasonable distance of direct and frequent bus services as this will reduce car usage
- Ambitious policy

Suggested amendments:

- Query over the reference to 15 minute frequencies and whether this is realistic
- Accessibility to bus stops must reach the required standard for both directions, so a bus stop on the opposite side of a busy road should only be appropriate if there is a nearby safe crossing of a form dependent on the nature of the road
- Suggestion that there should be a reference to more integration between modes, and integrated ticketing offers

Additional general themes and issues which were raised:

- Numerous comments regarding cost and frequency of services being unreliable which encourages people to drive
- Support for policy approach and aspirations but concerns that these will not be realised without funding when bus services keep being cut, suggestions that services should be run on a not for profit basis
- References to lack of funding for community transport, and community schemes being more appropriate for villages than inappropriately timetabled public services
- Query whether local authorities can mandate the implementation of bus services as they are operated by private companies, with route choices led by financial gains. Transport providers should be forced to delivery better services
- Specific points raised regarding lack of disabled access to westbound platform at Nailsea and Backwell railway station, short platforms and large gaps

Policy DP17: Travel Plans

A total of 8 comments were received against this policy. 0 objections, 3 support with amendments, 5 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- No objections

Reasons for support:

- The intentions of this policy are referred to as commendable.
- Support comments largely from Parish Councils.

Suggested amendments:

- Further clarification requested of the term 'Major residential, commercial, service and education developments' as the policy appears to imply travel plans will be

sought from all schemes of 10+ residential units, however the justification refers to the Highways Development Design Guide Appendix A, which sets different thresholds.

- The use of the words 'substantial amount of movements' is subjective, suggest a tighter form of wording relating to a number of movements per household or site per day.
- Request for inclusion of car clubs and electrical charging points for cars and bicycles.

Additional general themes and issues which were raised:

- Query over monitoring of travel plans in the longer term and whether this is done effectively.

Policy DP18: Parking

A total of 13 comments were received against this policy. 1 objection¹, 4 support with amendments, 8 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Proposals to reduce or restrict the level of parking in new developments should only be considered if there are genuine alternatives to car ownership which are efficient and convenient, not just on the basis of a transport plan.

Reasons for support:

- Reducing parking provision in highly accessible locations is referred to as desirable.
- General support for the redevelopment of car parks and welcome the reference to this only being permitted under certain circumstances.
- Welcome references to electric charging points.
- Support for parking standards for vehicles and cycles.

Suggested amendments:

- Suggestion that the policy should set out specific requirements for amount of charging points for electric cars.

Additional general themes and issues which were raised:

- Query over where electric charging points will be provided.
- Comment on how planning permissions granted in accessible locations should include a requirement that no residents should be eligible for residents permits, and that prospective owners would then be made aware of this when they purchase.
- References also made to pollution, congestion, delivery vehicles and parking on grass verges/pavements and how these issues impact on local communities.

Policy DP19 Airport related car parking

A total of 19 comments were received against this policy. 12 objections, 4 support with amendments, 3 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Unacceptable landscape, visual and ecological impacts
- Policy should restrict parking growth to force a change in attitudes and behaviour
- Off site parking should not be permitted unless provided with accommodation
- The priorities should be dictated by the Council, not set by Bristol Airport through their ASAS
- No more Green Belt should be used for parking, other park and ride options should be considered, and any further parking within the Green Belt inset should only be considered if there is a justified demonstrable need
- Concern that this policy allows Bristol Airport a monopoly on parking and will detract from the Council's intentions to increase public transport mode share

Reasons for support:

- Support subject to the robust application of the Airport Surface Access Strategy, and protection of the rest of the Green Belt.
- Support the policy insofar as Bristol Airport should be made to build multi storey car parking within the Green Belt inset rather than using more Green Belt land.

Suggested amendments:

- Suggestion from PCAA and parish councils that the policy should be re-worded to state:
'Increases in the provision of Airport related car parking within the Bristol Airport Green Belt inset will only be considered where it is justified by a demonstrable need, forms part of a sustainable approach to surface transport access to the airport in line with the transport hierarchy and does not undermine increases in public transport modal share'.
- Bristol Airport Limited request amendment to make clear whether this policy relates to only off airport parking.

Additional general themes and issues which were raised:

- Prices of car parking at Bristol Airport
- Enforcement and monitoring of on and off site parking
- Queries over permitted development rights for airports
- Confusion over remit of policy and whether it relates to both on and off site parking
- Better alternative travel options would reduce the need for parking
- Objections to Bristol Airport expansion
- Cross references to policies LP10: Transport infrastructure allocations and safeguarding and LP11: Bristol Airport.

Economic Development (Policies DP20 – DP30):

Policy DP20: Safeguarding Employment Sites

A total of 11 comments were received against this policy. 1 objections, 7 Support. Themes and issues raised were:

Reasons for objecting:

- Objection to the blanket protection of all employment sites, even those not allocated as an employment site. This is incompatible with proposals for Old Mill Road. Potential compatibility issue with SP9 that does not include reference to safeguarding existing business sites. As such, DP20 is not 'positively prepared' or 'justified' as blanket protection is not required to meet objectively assessed needs set out in SP9.
- Policy should distinguish between allocated and existing employment sites and should be more supportive of mixed use development in sustainable locations.
- Policy should include:
 - A prioritisation of the **allocated employment sites** for employment uses and other forms of economic development;
 - Where a site is **allocated for other purposes**, including those sites included in Schedule 1, there should be no blanket protection of employment uses. There should be no requirement on allocated sites to demonstrate that existing premises are no longer suitable for employment use as this would run counter to the purpose of allocating sites for other forms of development;
 - Within areas identified as **strategic regeneration areas**, such as the WWSA, there should be no blanket protection of employment uses and the policy should encourage the development of mixed use schemes which meet regeneration and sustainability objectives; and,
 - With regard to **existing non-allocated employment sites**, a positive policy should encourage proposals for new employment development especially those that create high quality employment and business development, but which recognises that in appropriate circumstances and sustainable locations mixed use development may also be acceptable.

Reasons for support:

- Support for the proposal to remove permitted development rights for employment land and new strategic employment areas as this will provide the LPA with confidence that these sites will deliver strong economic growth in the long-term.
- In Nailsea, many sites have converted to residential due to absence of safeguarding policy.
- Care should be taken to avoid conversion of business to poor quality res (link to PD point above).
- Support policy and hope it is applied to Castlewood site.

Suggested amendments:

- Policies map needs to be updated to reflect boundaries of current consent and pre-application discussions

Additional general themes and issues which were raised:

- Whilst none of the criteria included in the policy are unusual, would question the ability to measure the test of 'contributing to increased commuting'.
- Nb link to proposal to convert existing business site B on Parklands justified with marketing evidence (Homes England).

Policy DP21: Visitor attractions

A total of 4 comments were received against this policy. 0 objections, 3 Support with amendments, 2 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- None

Reasons for support:

- Agree with the policy and would encourage a regeneration incubator to be set up between the Council and local stakeholders to set up green businesses in the region, achieving at minimal cost the Local Plans zero carbon objectives.
- Should seek robust business plans to ensure facilities don't go out of use and become redundant.

Suggested amendments:

- A requirement for robust business plans to accompany the application.

Additional general themes and issues which were raised:

- Opening up the countryside to increased leisure activities is not compatible with nature protection.

Policy DP22: Visitor accommodation

A total of 4 comments were received against this policy. 0 objections, 1 support with amendments, 3 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- There were no objections

Reasons for support:

- Agree, even established brands should comply with strict rules for new developments

Suggested amendments:

- Include wording to protect the living conditions of any properties and ensure they are not prejudged by the development etc. of visitor accommodation

Additional general themes and issues which were raised:

- None
-

Policy DP23: Town Centres

A total of 8 comments were received against this policy. 2 objections, 1 support with amendments, 5 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- No mention of town centre parking or park and ride. Discriminates against villages and rural areas that are served by poor public transport
- Substantial parts of Nailsea Town Centre should be redeveloped for residential. Shopping habits have changed and it would bring back into use the derelict and down at heel shopping centre.

Reasons for support:

- Support but a clearer and stronger approach to the Wyndham Way area is needed
- Support the Two Towns strategy

Suggested amendments:

- Inclusion of the following wording “The Wyndham Way area (bounded by Wyndham Way, Harbour Road and Quays Avenue) is an opportunity area which is expected to deliver new homes and a net increase in employment space. This will be delivered as part of a coordinated masterplan established through the placemaking study being developed in consultation with local stakeholders and residents. Any development in the area will be expected to support the delivery of a new network of streets and connections which contribute to the wider active travel network of Portishead. The area will also be expected to reflect the other policy priorities of the Local Plan in supporting the existing town centre, social and

community infrastructure, retaining green infrastructure and positively supporting the wider flood management and water strategies."

- Reference should be made in the Local Plan to the opportunity for the placemaking study to inform the development of Supplementary Planning Guidance following the adoption of the Local Plan.
- the Wyndham Way Study Area should be formally identified in the Plan as a new strategic regeneration opportunity within Portishead

Additional general themes and issues which were raised:

- None
-

Policy DP24: District Centres

A total of 2 comments were received against this policy. Both supported the policy as drafted.

Policy DP25: Local Centres

A total of 7 comments were received against this policy. 0 objections, 0 Support with amendments, 7 support, but three of these include clarifying the application of the policy to only additional floorspace at Locking Parklands . Themes and issues which were raised were as follows:

Reasons for objecting:

- None

Reasons for support:

- Locking Parklands Local Centre (LP7) has outline consent so it's assumed that this policy restricting additional floorspace to 300m2 would apply only to any subsequent retail proposals?

Suggested amendments:

- Policies map needs to be updated to reflect boundaries of current consent and pre-application discussions

Additional general themes and issues which were raised:

- The proposals to enhance the amenity and accessibility of the Pill Precinct (neighbourhood Plan) are a good example of the ways in which centres in existing communities can be improved to also benefit the wider community.

Policy DP26: Primary Shopping Areas

A total of 6 comments were received against this policy. 1 objection, 1 Support with amendments, 4 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- There is no mention of town centre parking or a Park and Ride scheme. This discriminates against villages and rural areas that are served by poor public transport and exorbitant fares.

Reasons for support:

- Redevelopment of brownfield sites should be accompanied by a reduction in surface water run-off in accordance with Wessex Waters surface water run-off policy
- Support the policy and work to date on the Two Towns strategy.

Suggested amendments:

- Ensure Wessex water surface water policy is applied to brownfield redevelopment within Primary Shopping Areas
-

Policy DP27: Retail Parks

A total of 3 comments were received against this policy. All in support of the plan as drafted.

Policy DP28: Sequential approach

A total of 5 comments were received against this policy. All were in support of the policy as drafted.

Additional general themes and issues which were raised:

- Support the proposals and work to date on the Two Towns strategy for Clevedon and Nailsea
-

Policy DP29: Control of non-mineral development

A total of 4 comments were received against this policy. 0 objections, 1 support with amendments, 3 support.

Reasons for objecting:

- None

Reasons for support:

- Agree with the Plan
- Support as drafted
- Support policy approach to protect mineral resources from non-mineral development
- The associated facilities in north part of Stancombe quarry (concrete plant, offices etc.) should be safeguarded, which could be covered by policy DP29 but would be much easier to understand if the buffer zone and site boundaries are shown on the policies map.

Suggested amendments:

- Show buffer zone and site boundaries on the policies map to cover associated facilities in north part of Stancombe quarry.

Additional general themes and issues which were raised:

- None
-

Policy DP30: Mineral working exploration, extraction and processing

A total of 4 comments were received against this policy. 0 objections, 2 support with amendments, 2 support. Themes and issues raised were:

Reasons for objecting:

- None

Reasons for support:

- Agree with the Plan
- Support as drafted
- It is ridiculous to contemplate fracking which should be banned from North Somerset. Investment should be in renewables
- Generally applicants don't have to prove a need for a development and minerals should be no different. Indication of state of the aggregate landbank in applications would be legitimate.

Suggested amendments:

- Remove requirement to demonstrate need from the policy and replace with requirement for assessment of the state of the aggregate landbank at the time of application submission.

Additional general themes and issues which were raised:

- None

Historic and Natural Environment (Policies DP31 – DP39):

Policy DP31: Green Infrastructure

A total of 23 comments were received against this policy. 3 objections, 12 support with amendments and 8 support.

Reasons for objecting:

- Policy should be worded to link better with DP32(Nature Conservation) and DP33(Biodiversity Net gain), and also DP10(Sustainable Drainage), DP14(Active and sustainable transport), DP35(Landscape), and DP49(Healthy Place), to improve policy aims.
- Where populations are threatened, protected species identified, or where fragmentation could occur, we need protected/low disturbance corridors for wildlife without access by people, dogs and cats.
- Strong concerns about reference to off-site provision. Recovery and mitigation should be delivered onsite to ensure biodiversity and nature recovery are not further eroded overtime.
- Provision of high-quality GI will be increasingly critical within new developments, close to peoples' homes, to reduce wider recreational pressure on AoNB and wider countryside.
- The higher requirement for large-scale proposals of 10 dwellings or more is not justified; requirements affecting deliverability or viability require an evidence-based approach; proportionate requirements needed.
- The wording of this policy is cumbersome and covers matters best placed in the justification text.

Reasons for support:

- Welcome the requirement for new development to make provision for GI, including sustainable drainage infrastructure.
- Sustainable Drainage Systems should maximise opportunities for green infrastructure and deliver multiple environmental benefits, like water use efficiency, water quality, biodiversity, amenity and recreational improvements.
- GI provision should provides a nature-rich environment using native species of trees and shrubs, incorporating wildflower areas'.
- Urban tree planting and green spaces in development are essential and should be part of the policy.
- GI master plans should be fully embedded in the council's processes.
- The Justification makes no mention of the Local Nature Recovery Strategies which involve communities, businesses, landowners and other groups in the plans for North Somerset.
- Where green infrastructure is provided off-site this must only be counted once: tight auditing needed as greenwashing occurs.
- Policy wording should go further to recognise the potential for well-planned GI to contribute to a wide range of plan priorities.

- In addition to climate change and BNG opportunities the policy should also ensure GI maximises carbon storage and sequestration opportunities, including by protecting existing carbon sinks.
- The policy should apply the mitigation hierarchy, requiring first avoiding impacts on GI assets, and ensuring mitigation and enhancements are delivered on site where possible. Or where not possible, as near as possible to the site and those communities affected. Similarly for GI creation.
- The policy should require new development to meet agreed standards for GI provision, (high quality, well-designed) such as in Natural England's Green Infrastructure Framework, and National GI Standards currently being developed.
- Policy wording should link better with Policies DP10,14,32,33,35, and 49.
- There should be high quality and large areas of GI on development in or in the setting of the Mendip Hills AONB, to provide places to walk / dog walk, and reduce pressure on the AONB and wider countryside .
- Glad the WENP NRN referred to, but why is such commitment not in LP2 (Yanley), where a healthy network of woodlands and some grasslands could be established? Here (and in LP2) why not require that the Yanley development only take 3/4 of the site, leaving Green Belt protection in place?
- Support the criteria and requirement to enhance where possible.
- Concerned about reference to off-site provision. All developments must provide sufficient GI for people to access on their doorstep, for health, before off-site measures are considered.

Suggested amendments:

- Policy should indicate non- support for any development proposal which would harm a greenfield site which is strategically important, or core area for the NRN, providing multiple ecosystem services already. (Any provided GI would never match the existing).
- Amend bullet point 4 on important wildlife or heritage features to also retain and incorporate existing Rights of Way, and look to enhance and connect up the RoW network to support sustainable travel in, and access to, the countryside.
- Reference to 'high quality' should be replaced by 'well designed'.
- Refer to addition of scrub habitat to safeguard reptiles and invertebrates, in the Justification.t.
- For clarity, instead of 'where possible', indicate that all proposals will, where appropriate, ensure that green infrastructure is provided on site and be expected to deliver all of the bullet points

Additional general themes and issues which were raised:

- Allocation for the SEMH school on a valuable area of green space which would provide good amenity for 196 houses allocated nearby contravenes this policy.

Policy DP32: Nature Conservation

A total of 46 comments were received against this policy. 17 objections, 18 support with amendments and 11 support.

Reasons for objecting:

- Create protected/low disturbance corridors for wildlife where populations are threatened, protected species identified, or fragmentation possible. Eg. green strips for slow worms.
- management agreements are needed to protect areas in perpetuity.
- Policy should deliver a much stronger link to DP33 (Bio Net Gain). BNG should not be delivered through an offsetting scheme.
- Backwell proposals do not help to preserve biodiversity, (affecting bats like at Grove Farm, mixed meadow at East Backwell, large green spaces, wildlife habitats, failing to search for alternatives, and lacking detail on additional infrastructure.)
- Lighting schemes will unavoidably impact wildlife, as unless completely unlit will affect local insects.
- Yanley Ridge gives foraging corridors for bats, barn owls, kestrels and buzzards. A 'nature park' with people and dogs will affect spread of Skylarks nesting at the closed landfill site. Lighting, infrastructure etc will affect Yewtree Farm wildlife hotspot.
- Recognise other species and habitats, not just legally protected, 'priority' or 'notable' ones.
- Site allocations should have a multi-year Environmental Impact Assessment by ecologists not employed by a developer.
- The bat conservation zone does not appear on the Policies Map.
- No mitigation measures for large sites can meet Policy. There should be no mitigation to develop near/on a wildlife site

Reasons for support:

- Plan recognises 'linear corridors' for wildlife to migrate and disperse, and linking key habitat, so why propose loss of significant Green Belt chunks?
- Woodspring golf course is such a size that no mitigation can meet the policy. It will isolate Ashton Court and impact wildlife at Yewtree Farm by A38, Yanley Ridge, Barrow Woods and Colliter's Brook. Affects on quality green and blue space close by will make people drive out to see nature. Similar issues will apply at Backwell: Backwell Common (Green Belt) and the Grove Farm areas are wildlife havens, with protected species like otter seen by the Three Lakes at Grove Farm. Development on a smaller scale at Backwell would limit damage to the local environment.
- Aim for a verifiable increase in biodiversity; do not be limited to current levels.
- Policy should ensure that DP31 creates low disturbance, and developments have protected areas for wildlife mitigation. It should link more strongly to DP33 ; management plans should be in place and habitats protected in perpetuity.

- Where protected threatened species or Habitats of Principal Importance are identified, development should not be permitted, and mitigation not allowed. Council has no ecology officer; developer-funded reports are erroneous.
- No development should occur within or near SACs and SSSIs, like the Bats SAC Juvenile Sustenance Zone, which needs a suitable buffer (Consultation Zone A). Strengthen policy by linking it to these zones, local, national, and international designated sites, strategic GI corridors, and the Mendip Hills AONB.
- Update the Bats SPD to reflect new and evolving research particularly with flight corridors. Consultation zone B should be integrated with the GIS corridors.
- Beside water quality there should also be no detriment to greenfield runoff rates and flood risk and no damage to existing habitats like wet grassland.
- Developments should include homes for and measures for movement of wildlife like amphibians and hedgehogs.
- Require good sized, nature-friendly front and back gardens with locally native planting, not Laurel.
- Policy is overly reactive, and should go beyond conserving to proactively helping nature's recovery, aligned with a clear vision and strategic approach for nature in strategic priorities and policies. The Environment Act and 25 Year Environment Plan signals a change from conservation to nature recovery.
- Policy should give highest protection to irreplaceable habitats, as in NPPF, and give guidance on suitable compensation strategies.
- This policy etc should be subject to HRA/AA, with findings reflected in the policy requirements for new development.
- Strengthen the pre-application process with consultation timed early, integrated with the GI strategy, and GI put in place at the earliest stage.
- I need details on bullet 8 on Biodiversity Net Gain which is currently controversial.
- How is BNG assessed, by whom and how validated?
- Welcome the requirement to work around habitats impossible or difficult to recreate (like ancient/veteran trees, hedgerows and orchards)
- 'Incorporation of habitat features of value to wildlife within the development and building design' is low cost; it should be expected as a minimum.
- Policy requires developments to take account of ecological infrastructure, protecting higher value sites and resisting any developments that will result in adverse impacts.

Suggested amendments:

- Policy's first paragraph should acknowledge that mitigation is also an appropriate form of nature conservation,
- Paragraph 4 of policy on Bats SAC should go further to say no development will take place that would impact on the Juvenile Sustenance Zones, surrounding navigation routes and foraging land for Greater and Lesser Horseshoe Bats.
- paragraph 6 on 'development within or in proximity to a SSSI...' should also refer to the SSSI Impact Risk Zones (as identified by Natural England).
- Under Local Nature reserves and Local Sites add an additional bullet on creation of protected areas for legally protected species and habitats, where disturbance will be kept to a minimum, and management plans put in place and enforced.
- On water quality (bullet point 3) the policy should also incorporate no detriment to green field runoff rates and flood risk, and no damage to existing important wet grassland habitats / communities, to enhance nature conservation objectives.

- On bullet point 6 (features) add wording to ensure support for hedgehog populations by using fencing rather than walls in back gardens, and/or to provide holes in fences to allow for amphibian and hedgehog movement.
- On planting of locally native species (bullet point 8), remove 'wherever possible' to ensure inappropriate species are not planted as an alternative to natives; eg. Laurus spp. , which has little biodiversity value.
- Amend 2nd paragraph of policy 'on "retaining, protecting, enhancing and linking existing wildlife habitats' by adding 'in line with the Local Nature Recovery Strategy'.
- change "Retention of native woodland, native trees (to include veteran trees), native hedgerows..." to read "Protection of ancient woodland, retention of native woodland, native trees (to include ancient, veteran, and notable trees), native hedgerows..."
- Policy DP32 should be referred to as 'nature conservation and recovery'
- Add worms and grass snakes to list of declining species.

Additional general themes and issues which were raised:

- None

Policy DP33: Biodiversity Net Gain

A total of 28 comments were received against this policy. 6 objections, 15 support with amendments, 7 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- The council should emphasise Environmental Net Gain rather than the less effective Biodiversity Net Gain, which has been criticized for not including a natural capital focus, nor considering the environment as an integrated system.
- The BNG metric has been criticized as unfit for purpose; it does not value scrubby landscapes of bramble, thistle and ragwort, often key features of rewilding projects.
- DP33 should be linked more coherently with DP31 Green Infrastructure, to maximise policy outcomes.
- Priority should be for provision on-site. Where off-site is permitted it should provide similar habitat for the same species being affected, nearby or advantageously located near or on designated sites like LWS, SSSIs etc, or within the AONB, to maximise BNG.
- Registers of potential and delivered 'off-sites' should be maintained. The sites should be protected in perpetuity through management plans.
- Disagree with the BNG being delivered through an offsetting scheme.

Reasons for support:

- Agree with the Plan

- Support; policy is in line with Environment Act to come into force 2023.
- Policy wording needs strengthening to give clearer requirements for development, ensuring BNG is secured in line with local and strategic priorities.
- Welcome the intention to produce SPD on BNG, which, with the policy, should apply the mitigation hierarchy.
- Potential sites should be selected in line with all NPPF policies, selecting land with least environmental value, where consistent with other policies.
- The plan should include requirements to monitor biodiversity net gain, with specific indicators, in liaison with local partners like wildlife trusts for data sharing.
- Net gain can refer to biodiversity net gain, natural capital net gain or environmental net gain
- Further interim guidance will be required for applying BNG to sites like Locking Parklands with outline permissions and partially constructed, taking account of the previously developed or under-construction status.
- Pre application discussion and BNG assessment should occur as soon as possible
- Policy should link more clearly to Policies DP31 and 32.
- Policy should recognize/address that habitats can be irreplaceable, such as near / in SACs, SSSIs, LWSs, SNCI, along watercourses, etc, and there are limitations of off-site mitigation.
- The additional costs for the provision of biodiversity net gain on sites should be incorporated into the forthcoming Local Plan Viability Assessment (LPVA).
- No objection to aims of the policy, but it is not 'justified' by a proportionate level of evidence.
- Ad hoc habitat creation from small sites (0.5ha and under) in urban environments will be small scale, for which a 30-year management and monitoring requirement is a disproportionate level of complexity and cost to BNG.
- Local authorities should be cautious regarding monitoring and management requirements given the dynamic nature of Government guidance.
- Any offsetting should be fully audited to prevent duplication of provision.
- Need a more ambitious, greater than 10% target for net gain, increasing chances of worthwhile delivery, as initiatives may fall short. Nearer 20% should be achievable.
- Develop a local metric for more urban/brownfield sites, like the London Urban Greening Factor. They may have very low biodiversity, so a percentage increase may deliver little.
- It could be very difficult to demonstrate any net gain on a green field site; I doubt there will be a '10% net gain' for the Banwell Bypass.
- The Government considers 10% strikes the right balance; more should not be sought; locally derived variations cause uncertainty.
- Significant costs of biodiversity net gain should be included in the Council's viability testing
- North Somerset needs a council ecologist for this to be acceptable; otherwise it risks conflict of interest if consultants also act for developers.
- I seriously doubt your commitment to this and how you can be held to account.

Suggested amendments:

- Amend page 79, paragraph 8 from 'Sufficient new habitat or habitat enhancement should be created on or off site...' to 'Sufficient locally and strategically suitable habitat or habitat enhancement...'
- Add a policy requirement that land created/enhanced through BNG should be maintained, or protected in perpetuity, so the mitigation itself does not later get built out.

Additional general themes and issues which were raised:

- None.

Policy DP34: Trees and Woodlands

A total of 33 comments were received against this policy. 3 objections, 16 support with amendments, 14 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- There are a number of aspects of the policy which require further consideration. These are:
 - *'The equivalent of a minimum of one tree per dwelling is planted, to be located in gardens where practical'* - No justification or evidence is offered to underpin this as a formula. It also gives no consideration to site specific characteristics. Additionally, encouraging tree planting within gardens 'where practical' is not necessarily desirable, for the following reasons:
 - Planting trees within the demise of dwellings places the responsibility for their maintenance and longevity with individual residents making it more likely that they are removed.
 - This takes no account of the specifics of the dwellings and gardens in question, such as topography, residential amenity or practicalities of maintenance.
 - *'In exceptional circumstances where loss is unavoidable and fully justified, a suitable compensation strategy for replacement of trees, hedgerows, or to rectify damage (direct or indirect) to woodland is identified'* - It is not clear whether this requirement relates to all existing trees or whether it specifically applies to certain trees such as veteran or champion trees. No definition is offered, however, if this requirement is intended to relate to all trees (and hedgerows), it is overly onerous and should be removed.
 - *'Proposals for off-site provision is made where tree planting is not appropriate or practical on site'* - This requirement is lacks specificity and, therefore, is not appropriate as part of a policy for decision making. It should be made clear in what circumstances tree planting will be considered to be 'not appropriate or practical on site'.
 - *'All new residential development proposals include street tree planting into every street, using suitable species planted at intervals appropriate for the site'*.
- Paragraph 131 of the Framework states that 'Planning policies and decisions

should ensure that new streets are tree-lined'. Footnote 50 goes on to caveat this, stating 'Unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate'. The draft policy wording goes beyond this requirement, requiring every street in all new residential developments to include street tree planting. The draft policy should be revised to align with the Framework.

- Concerned that the compensation strategy set out within the policy supporting text does not allow for due consideration to the quality of the trees being lost. For example, as written, the policy text will require 8 replacement trees for the loss of a single category U tree of 80cm diameter at 1.5m above ground (as BS5837) which is an unreasonable proposition. We would suggest that the policy text is updated to remove these replacement metric ratios until further consideration can be made with regards to an assessment of quality which can be presented in the forthcoming supplementary guidance which the policy text alludes to.
- Having regard to the requirement for all new residential proposals including interval street tree planting to every street is onerous and fails to recognise the impact of tree planting on residential layouts where, perhaps land is constrained.
- The 2021 NPPF sets out a more collaborative, flexible, case by case policy approach than the Council's proposed prescriptive approach to tree planting in new developments. The Council should be encouraging the inclusion of more trees in development rather than imposing a requirement for every street to be tree lined. Before the North Somerset Local Plan pre-submission consultation, Policy DP34 should be modified.

Reasons for support:

- Support the policy but have no confidence that developers will carry through on their obligations
- Support for the aim to provide tree streets in all new developments.
- Encouraged by the need for larger developments to provide community orchard planting, and would encourage this to be followed through in practice; there are also opportunities for smaller developments to incorporate fruit and nut trees into them, which, with sufficient community engagement, could form 'mini-orchards' in small developments
- Trees are great for the environment if it is native to the area. More trees the better. They also help with other environmental issues like reducing flooding and prolongs the flow of water into rivers.

Suggested amendments:

- There appears to be no mention of the need for oversight of operations, ongoing management and monitoring throughout the development process. This is a glaring omission – has resulted in unnecessary loss of trees at Barrow Hospital. The policy should require that all woodland management operations must be supervised by a competent organisation and monitored closely thereafter. Where unnecessary or unjustifiable clearance does take place there should be a requirement for replacement of an equivalent number of trees on the same site or an equivalent area of land. We would wish to see North Somerset Council take a strong line on the needless clearances that have taken place at Barrow Hospital, requiring them to be replanted with native species as soon as possible.

- This policy should strongly emphasise the protection required for ancient woodland. The NPPF requires that development has no negative impact on this irreplaceable habitat - this can be from adjacent development that does not 'remove the tree' but harms the woodland through light, noise or air pollution. This should be reflected in this policy and the wording strengthened to reflect national policy.
- The table showing 'the number of trees required to compensate for the loss of existing trees' but it's not really the number, it depends on what exactly is planted as replacements. As a minimum it should certainly be what's known as 'Standard trees', preferably larger ones, although it can take longer for a large transplanted trees to re-establish and grow on. Developers should not be allowed to plant Whips, that is unless it's for a hedge or new woodland protected from deer and other animals
- This policy should strongly emphasise the protection required for ancient woodland. The NPPF requires that development has no negative impact on this irreplaceable habitat - this can be from adjacent development that does not 'remove the tree' but harms the woodland through light, noise or air pollution. This should be reflected in this policy and the wording strengthened to reflect national policy
- The Woodland Trust strongly supports this policy and proposes some minor amendments to strengthen it further.
 - 1) We welcome the specific point that "Ancient woodland and veteran/ancient trees are protected" in line with the NPPF. We recommend adding a requirement for buffers to protect ancient woodland and root protection areas to protect individual trees.
 - 2) We welcome the support for "new tree planting and woodland creation". We recommend setting a target for tree canopy cover as part of this policy, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease and by new planting to support green infrastructure.
 - 3) We welcome the point that "The equivalent of a minimum of one tree per dwelling is planted" and recommend complementing this with a specific canopy cover target for development sites. The Trust's Emergency Tree Plan recommends a canopy cover target for development sites of 30%.
 - 4) We strongly welcome the use of a ratio for tree replacement, which reflects the Woodland Trust guidance on Local Authority Tree Strategies (July 2016).

Additional general themes and issues which were raised:

- This policy does not appear to cover hedgerows which also require protection through policy.
- The Green Infrastructure Strategy should be used to secure TPOs on existing trees to protect wildlife corridors.
- Replacement trees need to be managed and protected from vandalism.
- Wider use of TPOs on development sites would be welcomed
- It would be helpful if the 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

- Developments should also be expected to incorporate a number of different native species of trees, both to provide variety to the landscape and to maximise benefits to nature, as well as incorporating native hedgerow species in preference to non-native species.

Policy DP35: Landscape

A total of 19 comments were received against this policy. 3 objections, 3 support with amendments and 13 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- The provisions of the policy are unduly onerous. Under bullet 1 it states that all development should not have an adverse impact on landscape character. This has been written with a negative skew without regard to the consideration of landscape capacity assessments to ascertain the level of development that can be achieved. In some locations this will be limited or wholly unacceptable, however in other locations and through sensitive and careful planning and design it can be successfully and readily achieved.
- Bullet 3 appears to replicate design policies – particularly where natural features (notably watercourses and their settings and views) are to be protected. There is undue duplication in the text.
- Proposed allocations at Backwell are contrary to the aims of this policy.

Reasons for support:

- A number of comments made in support of this policy and that the importance of landscape and understanding landscape character is recognised.
- Respect, conserve and enhance local landscape character, particularly in and around local villages such as Congresbury, and in and around the designated Mendip Hills AONB landscape.
- Supportive of the policy's attempt to minimise impact on landscape character.
- Minimising light and noise pollution will also be beneficial to wildlife, as will conserving and enhancing the natural or semi-natural vegetation characteristic of the area.

Suggested amendments:

- The last paragraph states that where harm to the local landscape character is unavoidable, but a development is otherwise deemed beneficial, positive mitigation measures should be secured. Clarity must be given to this statement; what would be deemed beneficial in terms of development?
- Where possible, the condition of historic hedgerows should be improved, which will both improve landscape character and provide vital habitat and ecological corridors for wildlife.

- This policy should be strengthened to require the use of natural materials in these locations including boundary treatments adjoining the public realm (no concrete products).

Additional general themes and issues which were raised:

- Who will make the judgement about the cumulative impact of development on the landscape?
- The policy is good but the large-scale housing allocations proposed in the plan adversely affect the landscape character.

Policy DP36: Green spaces not designated as Local Green Space

A total of 12 comments were received against this policy. 3 objections, 4 support with amendments, 5 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- What about the undesignated green space at Churchill which is proposed for a school but needed to provide green space in place of land allocated for housing at Ladymead Lane and Pudding Pie Lane?
- Policy will be used by many to oppose, for example, development of housing within existing residential gardens, even those well screened, which is overly restrictive and negative.
- You are already breaching this policy under pressure from developers, like at Trendlewood Way, Nailsea and all these green spaces are going to be filled.

Reasons for support:

- Agree with the Plan
- Non-protected green space is often identified for development too late for the community to respond.
- Some acknowledged value should be given to spaces shown to have continued use by the community
- The northern cricket ground, now a sports field, bounded by 39-59 Ham Green, Macrae Road and The Green, should be designated as Local Green Space contiguous with Watchhouse Hill.
- There are green space put forward for designation that get rejected, yet are important local assets.
- The approved Neighbourhood Plan for Abbots Leigh, Pill and Easton-in-Gordano lists a range of community leisure, recreation and play spaces in Pill/Easton-in-Gordano, not LGS, which qualify under this policy's criteria.
- The upper part of Farleigh Fields should be designated as permanent or public open space

Suggested amendments:

- Within the policy recognise the public amenity value

- Amend/ tighten policy so it can't be used to apply to every single green piece of space in towns and villages.

Additional general themes and issues which were raised:

- None.

Policy DP37: Mendip Hills Area of Outstanding Natural Beauty

A total of 16 comments were received against this policy. 0 objections, 12 Support with amendments, 4 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- N/A

Reasons for support:

- Any development proposals should have regard to the emerging Nature Recovery Plan and NRN maps

Suggested amendments:

- Strategic growth locations should have to justify development as an exception to this policy, should make this clear. Policy is at odds with LP1. DP37 should allow for major development allocated in the plan so should be amended to be clear that it does not apply to the SGL's
- The policy should refer specifically to the AONB special qualities when considering adverse impacts. We would also encourage the Council to require development within or in the setting of the AONB to be supported by a Landscape and Visual Impact Assessment (LVIA).
- The 'exceptional circumstances' and the requirement that it 'is in the public interest' need to be defined and strengthened to prevent the current unplanned and inappropriate major developments.
- Wording implies that other development (than major development) will be allowed and "where possible" weakens it.
- Dark skies are a vital resource which Bristol Airport detracts from.
- Remove second policy paragraph, the subsequent para is sufficient (why is there a ban on major development?)
- Fully support this policy. However, the 'exceptional circumstances' and the requirement that it 'is in the public interest' need to be defined and strengthened to prevent the current unplanned and inappropriate major development proposed for 83 houses within 100m of the boundary of the AONB.
- Large developments will always carry light pollution and effect the "dark skies".
- Paragraph 5 should be strengthened to state "...views to and from the AONB, as well as conservation of wildlife, habitats, cultural heritage, archaeology and geology."
to fully reflect the conservation and enhancement of the special qualities of the AONB.

- 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 tranquility enjoyed by residents within the AONB?
- Clarification needed on the acceptability of small scale tourism in the AONB, in line with Mendip Local Plan policy DP4 'New developments will be supported where: · they foster the social or economic well-being of the communities within the designated area or promote the understanding and enjoyment of the special qualities of the AONB - provided that such development is compatible with the wider purpose for which the area was designated.'

Additional general themes and issues which were raised:

- More protection is needed for areas adjacent to the AONB that have been overwhelmed with development.
- The Banwell Bypass is a great threat to the AONB and will open it up to developments of all kinds which no doubt you will justify as being in the public interest which it isn't.

Policy DP38: Built Heritage

A total of 10 comments were received against this policy. 1 objection, 3 support with amendments, 6 support.

Reasons for objecting:

- Policy is inconsistent with paras 199-208 of the NPPF which contain a more nuanced approach reflecting the magnitude of harm and setting out appropriate justification in each case. The inconsistency with the Framework not only renders the policy unsound but would, if adopted in its current form, present challenges for accurate and consistent decision making. For the reasons above, the current wording of draft policy DP39 is unsound and needs to be comprehensively revised.

Reasons for support:

- Numerous comments of support for the policy from CPRE, Portishead Town Council and Churchill and Wrington Parish Councils as well as an individual.
- There are two conservation areas within Churchill parish. Both are currently subjected to unplanned inappropriate, damaging, large planning applications.

Suggested amendments (all from Birnbeck Conservation Group):

- Third bullet Insert the following additions (shown here in bold type):
 "New development affecting the setting of a Conservation Area or listed building preserves those elements of the setting that make a positive contribution, **respects the existing elevations and contours of the setting** and, where possible **without**

transgressing the other requirements of this Policy, better reveals the significance of the conservation area or listed building”;

- In the ‘Justification’ section on page 85, insert the following new paragraph:
“Permission will not be granted for new development in Conservation Areas where it would exceed the elevation (measuring from ground level):-
 - of any pre-1901 building that may have previously occupied the development site within the past twenty-five years;
 - or otherwise, of the highest pre-1901 building within a half kilometre radius”.
- Page 85 In the ‘Justification’ section, insert the following new paragraph:
There will be a prima facie presumption that new development will harm the existing character and appearance of a Conservation Area where the proposed design is out of keeping with the predominant architectural style within a half kilometre radius, unless an alternative design can be credibly demonstrated to be of the most exceptional aesthetic quality.
- Insert the following addition (shown here in bold type) in the second to last paragraph of the justification:- “Permission for the demolition or redevelopment of a building of individual merit or group value will be exceptional. The implementation of any consent for demolition will only be granted where there is clear and convincing evidence that all reasonable efforts have been made to retain existing uses or introduce new viable uses and following **a wholly independent survey (funded by the applicant) which confirms the same** and the letting of a contract for approved redevelopment. Proposals for demolition, or for significant undergrounding of services must also comply with Policy. Reason: To provide an independent view that existing or new uses have been properly explored, including any attendant internal conversion of the building that might be required to facilitate new uses.

Additional general themes and issues which were raised:

- This policy should be applied not just to new development but to extensions and annexes the location and design of which may affect heritage assets.
- Protection of the built heritage is rightly seen as essential to preserving the character of our district. Continued under resourcing of the planning department (particularly conservation) means that the aspirations in this policy will not be achieved.

Policy DP39: Archaeology and non-designated heritage assets

A total of 7 comments were received against this policy. 1 objection, 0 Support with amendments, 6 support.

Reasons for objecting:

- Policy is inconsistent with paras 199-208 of the NPPF which contain a more nuanced approach reflecting the magnitude of harm and setting out appropriate justification in each case. The inconsistency with the Framework not only renders the policy unsound but would, if adopted in its current form, present

challenges for accurate and consistent decision making. For the reasons above, the current wording of draft policy DP39 is unsound and needs to be comprehensively revised.

Reasons for support:

- Numerous comments of support for the policy from CPRE, Portishead Town Council and Churchill and Wrington Parish Councils as well as an individual.

Suggested amendments:

- None

Additional general themes and issues which were raised:

- None
-

Policy DP40: Historic Parks and Gardens

A total of 7 comments were received against this policy. 0 objections, 0 support with amendments, 7 support.

Reasons for objecting:

- None

Reasons for support:

- Numerous comments of support for the policy from CPRE, Birnbeck Conservation Group, Portishead Town Council and Churchill and Wrington Parish Councils as well as an individual.
- There are both registered and unregistered Parks and Gardens within Churchill parish which need all possible protection.

Suggested amendments:

- None

Additional general themes and issues which were raised:

- None
-

Policy DP41: Coastal erosion and marine management

A total of 5 comments were received against this policy. No objections, 2 support with amendments and 3 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- None

Reasons for support:

- Agree with the Plan
- The policy and wider plan will need to be subject to HRA/AA, which may find that the control of new parking facilities and/or other mitigation measures will be required.
- In the Shoreline Management Plan's 'no active intervention' locations the potential for new habitat creation should be considered, to address coastal squeeze and alleviate flood risk elsewhere.

Suggested amendments:

- None

Additional general themes and issues which were raised:

- Please ensure that relevant information and reports are clearly posted on the website, especially with the potential for increasing sea levels and impact on the coastline, from climate change. It wasn't easy to find detailed information on the Shoreline Management Plans.

Life Prospects (Policies DP42 – DP52):

Policy DP42: Affordable housing (including rural exception schemes)

A total of 56 comments were received against this policy. 23 objections, 23 support with amendments, 10 support.

Reasons for objecting:

- No evidence available to show that the 40% requirement for affordable housing is viable.
- The late change of the target from 30% to 40% at the Council's Executive meeting in February does not offer confidence that the content of this draft policy is evidence led.
- The requirement for 40% affordable housing is not likely to be viable particularly on sites where other major infrastructure is required.
- By not publishing the Local Plan Viability Assessment until the Regulation 19 consultation the Council is reducing the opportunities for comment on this element of the evidence base. It is a less robust piece of evidence as a consequence. The Council should reconsult on the (Regulation 18) Local Plan with the supporting Local Plan Viability Assessment made publicly available for comment at the same time.
- The viability of specialist older persons' housing is more finely balanced than 'general needs' housing and this should be taken into account in the Viability Assessment.
- There is no affordable housing at Failand and therefore the need to provide affordable housing contributes towards the exceptional circumstances that would justify significant Green Belt release at the settlement.
- Concern that the increase in the percentage of affordable housing will draw funds away from other critical infrastructure which must be delivered to achieve sustainable developments.
- A whole plan viability assessment is needed to justify the requirements in the Local Plan including affordable housing.
- Viability will be challenged – it would be better to see delivery of open market housing without onsite provision, especially on smaller sites, say up to 50 and have the policy to obtain a financial contribution to enable the Council to deliver its own affordable housing.
- Rural Exception Site schemes outside the redrawn Pill Settlement Boundary will be very strongly resisted as inappropriate development.
- The policy fails to acknowledge that affordable housing could also be provided on smaller sites helping to meet the overall affordable housing requirement of 4,800 units.
- Concern that this tenure split would lead to a limited provision of shared ownership properties and does not allow for the provision of any affordable rent properties. We are reassured however, that the precise size and type of affordable housing to be provided on individual sites will be determined through negotiation, guided by local evidence.

- The proposal to increase the percentage to 40% would have a serious adverse effect on extracting funding from developers for other essential infrastructure and services. It would end up being counter-productive.
- The policy requires rural exception schemes to be for 100% AH but there should be some flexibility built in to allow for scenarios whereby an element of market housing is necessary to make the scheme financially viable.
- The requirement for rural exception sites to be initiated or supported by the local community should be removed. This requirement creates the potential for opportunities to meet affordable housing need in local communities to be denied despite clear evidence of the need. Planning decisions on Rural exception proposals should be determined on the basis of evidence and site suitability, with public and stakeholder comments considered as part of the overall planning balance, as far as these are material to the planning application, in the normal way.

Reasons for support:

- We consider the aspiration for this approach to be justifiable owing to North Somerset's acute affordable housing need; with alarming statistics in relation to both mean house prices vs mean earnings, and the extent of registrations on the Council's Home Choice Register.
- Support for Rural Exception scheme element of the policy, particularly at Pill and Easton-in-Gordano where there is a need for more affordable housing.
- Welcome the increased provision from 30% to 40% affordable housing.

Suggested amendments:

- The policy should clarify that new affordable housing will be made available to people on the local housing needs register, to ensure the housing serves to meet the needs of local people in housing need.
- Bristol CC have a fast track policy which allows a 20% provision of affordable housing as long as the development is commenced within 18 months of planning permission. An approach like this may have two impacts; increase the housing delivery rate and actually provide an equal number or more affordable housing over the life of the plan.
- That the affordable housing requirement and policy is amended based upon a revised evidence base.
- Suggest that the policy wording needs to take into account scheme viability as a key consideration on a site by site basis.
- Encourage the Council to consider a differential rate for large scale development to avoid creating an inflexible policy backdrop, resulting in delays to delivery through lengthy viability negotiations.
- Suggest that this policy is combined with SP8 (Housing) given the duplication and to aid the reader of the future Plan.
- It needs to be made clearer to residents as to what affordable housing actually means and who can apply. The current understanding is that affordable housing is not actually affordable to many first time buyers. Priority for affordable housing in rural areas needs to be given to local people with a strong connection to the villages.

- The allocation of sites for self build homes is an important way of providing affordable homes. It should be included in this policy.
- Amend policy to read:**The expectation is** that 25% will be First Homes **or other forms of market housing**.....
- Amend policy to read:main body of the settlement. **In certain circumstances, consideration will be given to a small element of market housing being provided on rural exception sites, provided that the need for such housing is justified, and that it is of a type and size that meets a recognised local need.**
- In order to improve the wording, we recommend that the Council includes reference to Annex 2 of the NPPF to ensure the longevity of the Plan.

Additional general themes and issues which were raised:

- Social housing should be well integrated amongst the larger developments. Developers should be discouraged from placing social housing close to major roads such as the A38 making it obvious that it is social housing.
- Need for affordable housing in Pill and Easton-in-Gordano.
- There should be affordable houses for rent to rectify the loss of Council housing.
- It is positive that rural exceptions sites for 100% affordable housing outside settlement boundaries will be considered to meet local housing needs. In terms of evidencing such need, the council should accept a variety of sources, such as housing needs surveys and information from the council's housing register. We encourage the council to accept cross-subsidy of market housing on these sites in order to facilitate affordable housing delivery where it may otherwise not be possible.
- Regard also needs to be had to the existing CIL which is levied in the area and any proposed changes to this so that it accords with the new plan (where the Council has said that this will be reviewed in parallel with the production of the New Local Plan).
- The requirement for 25% First Homes must also be tested in terms of viability and deliverability on both a district wide basis and for sub-areas.
- This housing should be distributed across the site and be "tenure blind" in design. For rural exception sites, in addition to those delivering 100% affordable housing, support should be given to co-housing or mixed tenure schemes for 50% or more affordable housing that are also built to certified Passivhaus standard or an alternative robustly audited Zero carbon standard.

Policy DP43: Gypsies, Travellers and Travelling Showpeople

A total of 6 comments were received against this policy. 0 objections, 3 Support with amendments, 3 support.

Reasons for objecting:

- No objections were received against this policy

Reasons for support:

- Three comments stated that they were in support of this policy as currently drafted.

Suggested amendments:

- Provide a specific commitment to providing a transit site within the plan period. This would help deal quickly and effectively with unauthorised encampments.
- Travellers should be written with a capital T to reflect the fact that they are an ethnic group and to distinguish from travellers going on holiday. Please amend.

Additional general themes and issues which were raised:

- The Local Plan must be alert to the habits, needs and lifestyles of the homeless and travelling communities. The emergence of "van livers" parking on residential roads during the winter months will surely increase as people struggle with increasing living costs.

Policy DP44: Accessible and adaptable homes

A total of 17 comments were received against this policy. 4 objections, 8 Support with amendments, 5 support.

Reasons for objecting:

- The policy gives no consideration to the adaptation of existing dwellings and puts the sole onus on those delivering new dwellings.
- The Council's evidence does not justify the proposed policy requirement.
- No local circumstances are identified, which demonstrate that the housing needs of North Somerset differ substantially to those across neighbouring authorities.
- The proposed requirement will need to be fully assessed within the suitable evidence to support the Policy.
- Any additional standard which are imposed via this policy (or any modified version) should be subject to robust viability assessment as part of preparing a final version of the plan.
- There is a significant difference between what is expected for M4(2) and M4(3) accessible dwellings, most notably that M4(3) compliant dwellings require a

greater footprint than M4(2) dwellings and are therefore significantly more costly for developers to provide.

- A general reference to an ageing population doesn't provide sufficient justification for the inclusion of these policy requirements.

Reasons for support:

- Several comments of general support for the policy

Suggested amendments:

- A caveat should be included to note that this level of provision is subject to site specific circumstances as, for example, topography may not enable step free access to dwellings.
- Additional clarification is also sought with regards to the intended split of M4(3) in terms of M4(3)a (wheelchair adaptable) and M4(3)b (wheelchair accessible).

Additional general themes and issues which were raised:

- The policy could become obsolete if the Government produces guidance and changes to Building Regulations Part M following their consultation document "Raising Accessibility Standards for New Homes".
- Appropriate costs for delivering enhanced accessibility standards should be allowed for in the forthcoming Local Plan Viability Assessment.
- All new homes are built to M4(1) "visitable dwelling" standards. These standards include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at accessible heights and downstairs toilet facilities usable by wheelchair users. M4(1) standards are not usually available in the older existing housing stock. These standards benefit less able-bodied occupants and are likely to be suitable for most residents.
- Adaption of existing stock will form an important part of the solution
- The requirement for M4(3) should only be required for dwellings over which the Council has housing nomination rights as set out in the NPPG (ID 56-008-20150327).

Policy DP45: Residential space standards

A total of 13 comments were received against this policy. 4 objections, 3 support with amendments and 6 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Requiring the Nationally Described Space Standard (NDSS) across all residential development, including affordable tenures, could undermine the viability of development schemes.
- The application of both NDSS and accessibility standards should be demonstrated to be viable across various development scenarios through robust viability testing before required through policy.
- Requiring the NDSS may result in fewer homes being built as an increase in the size of dwellings will reduce dwelling numbers.
- No evidence of a specific need for such a standard in North Somerset.
- Many eligible households in North Somerset may not desire, or require housing that meets the NDSS, as it may result in for example, higher rental and heating costs. For affordable housing in particular, there may be instances where achieving NDSS is impractical and unnecessary.
- As it stands there will be no purpose built student accommodation or other types of purpose built residential such as built to rent or co-living, which Weston in particular has the potential to provide. This type of accommodation has a role to play in meeting housing demand but will not be delivered with this policy, which will limit opportunities for those that do not require affordable housing but require housing that is affordable to them.
- An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing.

Reasons for support:

- A number of general comments of support for the policy.

Suggested amendments:

- Still too woolly and developers will use the loopholes provided to get out of providing minimum space standards. I suggest you delete the get-out clauses and just put a full stop in the sentence after "existing structure of the building".
- Typo in the first paragraph should read (regarded as having)
- If the proposed requirement for NDSS is carried forward, the Council should put forward proposals for transitional arrangements. The land deals underpinning SUEs and non-strategic sites may have been secured prior to any proposed introduction of the NDSS.
- Reference to the conversion of residential accommodation to Air B & B must be considered. And clarity given to the policies to protect against short term letting and the effect this could have on adjoining properties.

Policy DP46: Homes for all

A total of 34 comments were received against this policy. 14 objections, 13 Support with amendments, 7 support.

Reasons for objecting:

- Significant objection to the policy requirement that on sites of 100 or more homes 5% of the total homes should be made available for serviced self-build or custom build plots. Reasons for objecting to this element of the policy included:
 - No viability evidence is available to ascertain whether 5% is appropriate or not
 - It is not clear how the 5% has been arrived at in response to the figures that are contained within the West of England Local Housing Needs Assessment (2021) and the North Somerset Register.
 - There is no legislative or national policy support for the imposition of an obligation on landowners or developers of sites to set aside plots for self & custom build housing. The responsibility lies with the Council (rather than landowners or developers), to ensure that sufficient permissions are given to meet demand.
 - If a % is to be included it needs to be properly justified by evidence of both need, and any locational differences across the District as well as viability.
 - The requirement that self-build or custom build plots are delivered in the first phase is not justified and risks compromising good place making.
 - The interaction of this policy with policies on affordable housing should also be clarified.
 - It is unlikely that self & custom build serviced plots on larger residential sites will appeal to those wishing to build their own home.
 - Allocating plots for self-build or custom build on larger sites raises many issue in terms on on-site impracticalities e.g. health and safety issues, access issues etc.
 - The proposed marketing period of 18 months is too long.
 - The HBF consider that the provision of serviced self & custom build plots will have a bearing on the development economics of the scheme.
- Numerous objections to the part of the policy which requires older persons accommodation to be delivered on sites of 100 dwellings or more. This was for a number of reason including:
 - The threshold of 100 dwellings is too low and could result in development of the site being compromised.
 - The Council should focus on allocating suitable sites for a wide range of different types of development across a wide choice of appropriate locations rather than requiring for older persons accommodation on sites for 100 or more dwellings.
 - This policy requirement should be appropriately viability tested to ensure it is achievable in practice
- There is no justification for the proposal regarding Nailsea to have no more than 20% of 4 bedroom homes or more on major development sites.

- The retirement and assisted living market can have different locational requirements which could be at odds with the Council's current housing distribution within Policy SP8
- There is no reference to single storey dwellings for people with special needs.

Reasons for support:

- Agreement with the housing mix set out in the first paragraph.
- Community Land Trusts (CLTs) have a proven track record of success in delivering affordable housing for local people, particularly in rural areas. The SWHAPC is pleased that this is recognised but would like to see more detail relating to this how this approach will be carried out. It would be particularly useful if the Local Plan included a commitment to support CLTs in their choice of site.
- 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.
- Strongly support. In particular 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.
- Fully support the inclusion of self build plots in developments of 100 dwellings or more.

Suggested amendments:

- With regard to the self build requirement in this draft policy a significantly greater level of detail should be included within the supporting text with regard to matters including, but not limited to, design standards, plot delivery, marketing requirements, default arrangements for unsuccessfully marketed plots.
- In order to support and maintain the aspiration that no more 20% of houses should be 4 bedrooms or more, the policy needs to propose more specific measures to guarantee that houses will not be extended subsequently. E.g. greater provision of flats or terraced houses.
- Clarity should be provided to confirm if Policy DP46, as drafted, should require "retirement accommodation" or a more flexible approach to supporting the older population.
- Clarification should be inserted that following the marketing of self-build or custom build plots for 18 months, respective plots will be returned to the open market.

Additional general themes and issues which were raised:

- None

Policy DP47: Older Persons Accommodation

A total of 19 comments were received against this policy. 3 objections, 8 support with amendments and 8 support.

Reasons for objecting:

- The policy shouldn't require space for residents to grow plants and food. Many residents look to move into specialist accommodation because the maintenance of a private garden has become a burden.
- The provision for specific accommodation for older people should be targeted for local people; not for people moving out of Bristol.
- This policy does not go far enough. It is too wordy - reduce the words and be more specific. Extra care is increasingly popular and I would like to see a policy commitment to providing more of it. The final sentence is meaningless and does not address the accommodation needs of older people in any way.
- To provide homes for older people, the Council should allocate sites for older persons housing subject to criteria such as the proximity of sites to public transport, local amenities, health services and town centres
- The policy should address the issue of smaller properties, particularly bungalows, being extended into large 4/5 bed family homes thus reducing the stock of smaller housing for older people to downsize to.

Reasons for support:

- Sites such as Locking Parklands can assist in delivering a mix of accommodation including retirement, assisted living and care provision which will also foster a mixed and balanced community.
- Commend the Council for taking active steps to increase the delivery of specialist older persons' housing and consider that, for the most part, the policy is positively prepared.
- Recognition of the role of extra-care and residential care homes is welcome. We believe this confirms that the residential nursing home at Orchard View in Ham Green approved in our Neighbourhood Plan will move forward when it comes to planning approval.
- Pleased that Policy DP47 outlines that the Council will seek an element of affordable housing provision for elderly people as part of appropriate market-led developments for older people. Affordable housing is a necessity for all demographics, and the recognition of this is encouraging.

Suggested amendments:

- Inspired Villages makes the following eight recommendations which should be incorporated into the emerging local plan including ensuring the policy is based on a clear understanding of specialist housing for older people; is based on robust evidence; allocate sites in sustainable settlements; set a figure for the amount of specialist housing required over the plan period; monitor the delivery of housing and address under provision; consider the provision of older persons housing within strategic sites; recognize the benefits of providing older persons housing; and set

out different policy requirements for affordable housing for C2 use compared to C3 use based on viability.

- Further clarification on the nature and level of the affordable housing requirement within the policy will need to be given in subsequent guidance including confirmation that this will not relate to those schemes falling within use class C2.
- It should be a requirement of the policy to include a number of open market homes suitable for the elderly to downsize to in any large development.
- The requirement for accessibility of old people's homes to shops, public transport and services should be modified so that important sites, are not sold off for this use, which can sap the vitality of the town centre.

Additional general themes and issues which were raised:

- None

Policy DP48: Residential Annexes

A total of 6 comments were received against this policy. 0 objections, 3 support with amendments and 3 support.

Reasons for objecting:

- No objections were raised against this policy.

Reasons for support:

- Three comments supporting the policy

Suggested amendments:

- Suggestion to delete the bullet point: "it should be demonstrated how it can be incorporated into the main dwelling when there is no longer a need for the annexe" as it is too restrictive.
- The conditions set out for residential annexes are insufficient to ensure that granny annexes do not change their status either to infill dwellings or as holiday lets. Suggest adding to the policy to include the fact that any such change of use is not permitted development.

Additional general themes and issues which were raised:

- Tightening the conditions for granny annexes to prevent their use for dwellings or holiday lets is welcomed in principle but the conditions must not be so tightly drawn as to prevent permitted development rights or the right to apply for a change of use at a future date.

Policy DP49: Healthy Places

A total of 5 comments were received against this policy. 0 objections, 3 support with amendments and 2 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- No objections against this policy.

Reasons for support:

- A number of comments made in support of this policy

Suggested amendments:

- The policy should be expanded to recognise all new development should be seeking to contribute to healthy places, albeit at differing scales, and set out expected requirements for smaller developments that will not be required to provide a HIA.
- There is lots of evidence that connecting with nature improves mental wellbeing (Nature connection is something that can be measured) and improves personal resilience. The role of green infrastructure in creating healthy places should be recognised in the policy.
- Ensure access to community hub is available for each residential area.
- 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 2038 so that they inform and build on each other.

Additional general themes and issues which were raised:

- None

Policy DP50: New educational, sporting, leisure, health and community uses

A total of 6 comments were received against this policy. 2 objections, 1 support with amendments, 3 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Nailsea already has a deficit of leisure provision and the existing facilities are dated, inadequate and coming to an end of their useful lives.
- Much of the open land around Backwell is important to the wellbeing of people who use footpaths. Open space helps with mental health

Reasons for support:

- No specific reasons given.

Suggested amendments:

- Broadly support the approach proposed within this draft policy, the first two bullet points are very similar and should be combined

Additional general themes and issues which were raised:

- None

Policy DP51: Provision of educational, sporting, leisure, cultural and community facilities to meet the needs of new development

A total of 6 comments were received against this policy. 1 objection, 2 support with amendments, 3 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- DP51 states that facilities will be provided in tandem with population growth, however Nailsea is already experiencing a deficit of leisure provision and the current leisure and sporting facilities in the town are dated, inadequate and coming to the end of their useful lives. A site must be established and safeguarded to allow for this future provision of leisure and schools within Nailsea prior to any proposed development.

Reasons for support:

- Strongly support despite lack of facilities provided in conjunction with recent 300+houses. How will NSC ensure implementation of this admirable policy?

Suggested amendments:

- None specific to this policy

Additional general themes and issues which were raised:

- Lack of existing facilities

Policy DP52: Protection of existing educational, sporting, leisure, cultural, health or community facilities

A total of 8 comments were received against this policy. 1 objection, 3 support with amendments, 4 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- It gives wider exceptions to para 99 including 'normal market value' and 'business plan' to make it profitable. And through consultation with a distinct closed set of groups/stakeholders that there is no demand – How will they 'assess' supply, demand and future demand to conclude that there is 'no demand'?
- First part of the policy need to ensure that if any playing field site/sport & recreation facility is deemed to meet NPPF 99 prior to its allocation.
- Second bullet point – doesn't meet para 99a of NPPF.
- Third bullet point – not supported as this could lead to potential increases in a number of enabling development proposals. The NPPF does not support enabling development for this type of development.
- Fourth bullet point – is this supposed to replicate 99c?
- Fifth bullet point – para 99 of the NPPF does not differentiate between types/owners of playing fields. In fact, a playing pitch strategy (PPS) should audit all playing fields (regardless of ownership) in an area to judge if they are in community use or could be part of the future supply. How does (education) be satisfied that the land is no longer required for education/school use? Why does education land in this Local Plan get special treatment above other landowners? Isn't education land, land provided by the public purse and should be available to the public? Sport England would have no objection to 'brownfield' parts of closed schools being re-developed if playing field land remains protected for public use.
- Policy may need to be split up with a new policy on sport and recreation land and buildings which more closely and tightly follows NPPF para 99. Sport England has Government recognized guidance on assessments as well as what constitutes surplus to requirements and replacement facilities. All playing field land should be protected by NPPF par 99.
- NSC must find the CIL money necessary to ensure re-opening of the Churchill Sports Centre
- Backwell
Plan contains insufficient detail about new school provision in Backwell to meet the needs of the proposed development allocations.
- There is currently a shortage of sports pitches in Backwell. Existing facilities should be protected and improved.
- Expanded doctors and dentist facilities are needed. Current provision is inadequate.
- Both community halls are dated and lack parking space a 60% increase in population will require new facilities easily accessed by the community.

Reasons for support:

- NSC must find the CIL money necessary to ensure re-opening of the Churchill Sports Centre
- Welcome the policy which supports NPPF para 93 in relation to local theatre and cinema
- Venues in North Somerset.

Suggested amendments:

- Amendments are needed. Because it includes non-sports uses it is too lax (as below).
- It gives wider exceptions to para 99 including 'normal market value' and 'business plan' to make it profitable. And through consultation with a distinct closed set of groups/stakeholders that there is no demand – How will they 'assess' supply, demand and future demand to conclude that there is 'no demand'?
- First part of the policy need to ensure that if any playing field site/sport & recreation facility is deemed to meet NPPF 99 prior to its allocation.
- Second bullet point – doesn't meet para 99a of NPPF.
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- Policy may need to be split up with a new policy on sport and recreation land and buildings which more closely and tightly follows NPPF para 99. Sport England has Government recognized guidance on assessments as well as what constitutes surplus to requirements and replacement facilities. All playing field land should be protected by NPPF par 99.

Additional general themes and issues which were raised:

- None

Countryside (Policies DP53 – DP63):

Policy DP53: Best and most versatile land

A total of 23 comments were received against this policy. 12 objections, 6 support with amendments, 5 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Good quality agricultural land should be used for local food production
- The proposed housing in Backwell does not comply with this policy as development builds over two large areas of agricultural land, one of them Green Belt
- Unclear what precedence this policy is given in hierarchy of other policies
- Agricultural land is a finite resource
- Much of this open land (adjacent to the Backwell) is important to the wellbeing of people who use the networks of footpaths, and wildlife, including protected species

Reasons for support:

- Following national practice
- Support the attempts to retain valued landscape and wildlife habitats; produce enhanced biodiversity; moves towards reduced emissions and 'net zero'

Suggested amendments:

- Policy must conform to NPPF and Planning Practice Guidance (Natural Environment and Minerals). The conservation and sustainable management of soils is reflected in the National Planning Policy Framework (NPPF), particularly in paragraph 174.
- We strongly advise the plan includes core policies for: the protection of best and most versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification (ALC)); and for the protection of and sustainable management of soils as a resource for the future.
- Areas of poorer quality land (ALC grades 3b, 4, 5) should be preferred to areas of higher quality land (grades 1, 2 and 3a).
- Policy to recognise that development has an irreversible adverse impact on the finite national and local stock of BMV land.
- Every effort should be made to prevent, or at least minimise, any built development on the 'best and most versatile' land, with this clearly reflected in planning policy.
- Minimise impact on soil and agricultural land quality on greenfield sites by giving more appropriate weight to the intrinsic character and sustainability of the many ecosystem services provided by the area's soils.
- Soils of high environmental value should also be considered as part of ecological connectivity (Nature Recovery Network/Green Infrastructure)

- Reference should be made to Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites
- 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.

Additional general themes and issues which were raised:

- Requires detailed ALC surveys to support plan allocations and for subsequent planning applications (for all sites larger than 5 ha). ALC surveys to support plan allocations and for subsequent planning applications for smaller sites (1 – 5 ha) would be welcomed.
- We note in the Sustainability Appraisal that the available GIS data for agricultural land classification did not distinguish between Grade 3a and 3b
- Hope an attempt has been made to calculate the area that could be lost from housing and employment development, road, and other transport related construction, from potential solar panel installations, etc
- The 25 Year Environment Plan (25YEP) sets out government action to help the natural world regain and retain good health, including highlighting the need to: protect the best agricultural land, put a value on natural capital, including healthy soil, ensure all soils are managed sustainably by 2030 and restore and protect peatland
- Soil handling and sustainable soil management strategies for smaller sites (1 – 5 ha) would be welcomed.
- For minerals and other temporary forms of development, plans for reinstatement will be required to return to the former land quality.
- To refer to soils issues within relevant policy areas such as renewable energy, climate change, green infrastructure and biodiversity net gain, flood schemes, managed realignment, development design and landscaping.
- The planning authority should ensure that sufficient site specific ALC survey data and site-specific soil survey data is available to inform decision making. For example, where no reliable or sufficiently detailed information is available, it would be reasonable to expect developers to commission a new ALC survey, for any sites they wish to put forward for consideration in the Local Plan

Policy DP54: Rural workers housing

A total of 3 comments were received against this policy all of which supported the policy as drafted.

Policy DP55 Agriculture and land based rural businesses

A total of 6 comments were received against this policy. 0 objections, 3 support with amendments and 3 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- No objections were raised against this policy

Reasons for support:

- 3 supporting comments received.

Suggested amendments:

- Reference should be made to new agricultural infrastructure that will support the development of businesses growing food for direct human consumption, including market gardening, polytunnels, vegetable packing sheds, hydroponic and similar non-land-based growing systems, and buildings intended for growing edible fungi
- Encouragement of and support for, smaller scale farming would be welcome.
- The economic parameters of sustainability need to be extended. Land-based businesses can have huge benefits on people's physical and mental well-being, as well as bring great biodiversity and carbon sequestration gains; sometimes these values are hard to quantify in 'economic' terms, despite being clearly highly valuable.
- Analysis of the impacts of businesses should allow for the impact on human and natural well-being, and carbon sequestration.
- Provide preferential planning support for enterprises which provide social value and increase biodiversity and carbon sequestration. Developments should demonstrate community-led aspects, be zero-carbon (Passivhaus or similar) and low-impact.

Additional general themes and issues which were raised:

- No additional themes or issues raised against this policy.
-

Policy DP56 Equestrian development

A total of 3 comments were received against this policy all of which supported the policy as drafted.

Policy DP57: Recreational use in the countryside

A total of 16 comments were received against this policy. 12 objections which relate to the inconsistency of the policy and the proposed allocations at Backwell, 0 support with amendments, 2 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- The proposed local plan allocations for Backwell ignore this policy
- Existing walking routes around Backwell will be compromised through the two proposed allocations
- Could be interpreted as support for a stadium in the area around Backwell.

Reasons for support:

- None given

Suggested amendments:

- No amendments to this policy itself were suggested

Additional general themes and issues which were raised:

- None
-

Policy DP58 Replacement dwellings in the countryside

A total of 6 comments were received against this policy. 0 objections, 3 Support with amendments, 3 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- No objections raised

Reasons for support:

- The 3 supporting comments received were not accompanied with reasons.

Suggested amendments:

- Policy should highlight the particularly high potential for impacts on bat roosts, especially horseshoe bats associated with the Bats SAC, in relation to replacement dwellings and conversion or reuse of rural buildings and the need for adequate surveys and mitigation
- The size restriction for replacement dwellings in the countryside is not clear whether this is floor area or volume or buildings, and should be removed as this is not an issue for land outside the Green Belt

Additional general themes and issues which were raised:

- No additional themes or issues raised against this policy.

Policy DP59: Conversion or re-use of rural buildings

A total of 5 comments were received against this policy. 1 objection , 1 support with amendments and 3 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- The necessity for buildings to be capable of conversion leads to hundreds of dilapidated buildings being left to rot. Should be treated as PDL and conversion to residential allowed provided they conform to DP1 and SP4. Examples elsewhere of new efficient buildings being integrated with the existing structure e.g. The Parchment Works in Northamptonshire and Corten Building.

Reasons for support:

- Should exclude short term lets i.e. air B&B which can have unwelcome social, design and community effects.

Suggested amendments:

- Proviso that the building is substantially retained and has a roof should be removed to allow for re-use of buildings through good design which could usefully add to the housing stock.

Additional general themes and issues which were raised:

- General support but not for short term let.

Policy DP60 Previously developed land in the countryside

A total of 8 comments were received against this policy. 0 objections, 5 support with amendments, and 3 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- None

Reasons for support:

- No reasons given for outright support

Suggested amendments:

- Agricultural buildings should be considered brownfield land as per the "levelling up the rural economy" paper 2022 which could encourage economic growth.
- Should recognize that Previously Developed Land can still have biodiversity interests, particularly invertebrate diversity which should be protected in the policy.
- Expect to see a reduction in existing surface water on brownfield sites by the implementation of multi-benefit on site SuDS (see Wessex Water Surface Water Policy)
- Remove paragraph stating "Residential use will be permitted if: and the two bullet points which follow it. The requirement for redevelopment of previously developed land to be considered for employment or any other use before considering residential, and then requiring the site to be close to an existing settlement, is unreasonable and not justified. Oversimplistic to say that residential use is less sustainable than economic use. The draft Local Plan is contrary to the NPPF which doesn't contain this hierarchy.

Additional general themes and issues which were raised:

- A list of succinct bullet points
- Conygar Quarry should be recognized as PDL, it has not been subject to restoration. NPPF recognises that land to meet community needs may fall beyond settlement areas or areas not well served by public transport.

Policy DP61: Employment on greenfield land in the countryside

A total of 8 comments were received against this policy. 1 objection on the basis of loss of greenfield land at Backwell, 2 support with amendments and 5 support the policy as drafted. Themes and issues which were raised were as follows:

Reasons for objecting:

- In only allowing development proposals that relate to processing locally grown produce and land based rural businesses this is opposite to that which is advised by the NPPF through promoting economic diversity

- Design matters should be confined to the design policy and deleted from draft Policy DP61
- Loss of greenfield land at Backwell

Reasons for support:

- Locally grown produce is important

Suggested amendments:

- Should be recognised that construction on greenfield sites adds new foul sewerage flows into existing sewers, which may require improvements down stream. There should be no surface water connections to the foul sewer network.
- Policy should be reworded to remove the need for uses to be confined to locally grown produce and land based rural business in accordance with the NPPF.
- Design criteria should be removed.

Additional general themes and issues which were raised:

- None

Policy DP62: Existing businesses in the countryside

A total of 3 comments were received against this policy, all in outright support of the policy.

Policy DP63: Visitor accommodation in the countryside including camping and caravanning

A total of 6 comments were received against this policy. 3 objections, 0 support with amendments and 3 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- Too lenient in allowing the change of use of a “failed” holiday accommodation into permanent residence after 10 years. If no longer viable should be demolished.
- No clarity on what would be supported within the AONB. Does policy DP37 apply instead?

Reasons for support:

- Only one reason was given for support and that was in relation to the opposition to new buildings for visitor accommodation in the green belt.

Suggested amendments:

- Clarity over whether any of this policy applies in the AONB

Additional general themes and issues which were raised:

- None

Delivery

Policy DP64: Infrastructure delivery and development contributions

A total of 18 comments were received against this policy. 5 objections, 8 support with amendments and 5 support. Themes and issues which were raised were as follows:

Reasons for objecting:

- The affordable housing target of 40% means that developers are unlikely to be able to contribute to required infrastructure costs to any significant extent
- Contributions towards infrastructure are not enough and developers need to be responsible for developing a community
- Concern CIL/S106 contributions will not cover the infrastructure costs required by the additional 1,781 dwellings proposed for Nailsea
- What guarantees the required roads, schools, doctors' surgery, shops, community facilities etc. will be put in place before any new housing, and who will pay for it?

Reasons for support:

- Support the inclusion of environmental infrastructure

Suggested amendments:

- Policy should reflect the mechanism by which planning obligations under S106 will be reasonably sought, and the use of CIL
- Policy should be consistent with legislation and national policy as set out by Regulation 122(2) of the CIL Regulations 2010, and Paragraph 57 of the NPPF
- Green Infrastructure should be recognized as essential infrastructure which can provide strategic solutions for issues such as flood risk, drought and health
- Remove the phrase "in step with" as this is open to adverse interpretation
- Strategic housing developments should only be commenced or occupied once the key infrastructure has been delivered

Additional general themes and issues which were raised:

- More transparency on what CIL/S106 contributions have been spent on locally to accommodate new housing
- Further consultation with Parish Council's on infrastructure spending required
- The allocation of funding to the Parish Council's should be less restrictive
- A draft Charging Schedule, informed through consultation, should be prepared
- The draft Infrastructure Delivery Plan needs to be informed by the next stages of the Transport Assessment, including details of the transport mitigation packages for strategic locations

- The Infrastructure Delivery Plan should refer to the improvements at Edithmead Roundabout/J22 as set out in Policy BH7 of the adopted Sedgemoor Local Plan as well as investment at M5 Junctions 19, 20 and 21
- Details on how the Infrastructure Delivery Plan will be monitored and enforced
- If works are in the vicinity of the Exolum pipeline, contact Exolum Pipeline System Ltd