

## North Somerset Council comments on the submitted Portishead Neighbourhood Plan

Plan para/policy	NSC comment	Remedy
<b>Overall approach</b>	The Neighbourhood Plan is in general an easily read, well evidenced, locally specific plan.	
<b>General</b>	<p>The Plan contains many references to North Somerset Council's adopted Core Strategy, Site Allocations Plan and Development Management Plan policies but does not always add greater detail. In many instances the references to these policies could be made instead within the Basic Conditions Statement with an explanation of how the policy conforms to them.</p> <p>Where the policy or text refers to a supporting background paper e.g. the Portishead Community Character Statement, or the Local Housing Needs Assessment, then links should be provided to these documents for ease of use and to avoid doubt. The policies should also spell out what particular conclusions of the report the policy seeks to enact, for example PWH3 new housing to meet local needs, the policy should state specifically what the local needs are in Portishead e.g. are they 1, 2 and 3 bedroom properties to rent, if that is the conclusion?</p> <p>This will enable consistent implementation and effectiveness of the policy.</p>	Include the specific criteria as set out in each of the background evidence papers, that development proposals will be measured against.
Character and amenity	There are frequent references within policies to protecting character and amenity however the Plan should be read as a whole and this may be dealt with in PEB1 and PEB2, so question the need for the specific cross reference?	Remove cross references
Town Council Supports	There are many references to the Town Council supporting a particular approach-should these instead refer to "the Neighbourhood Plan supports"?	Amend to read " the Neighbourhood Plan supports..."

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Para 1.5	The timescale for the Plan is to 2038 however the Spatial Strategy that it is aligned to is the North Somerset Core Strategy which has an end date of 2026.	Change date to 2026
<b>Environment</b>		
Policy PEN1 Landscape setting and views	The policy wording could be more precise. Figure 2 doesn't identify views so perhaps more accurate to say "...landscape character, views and features, <b>having regard to the Landscape Character Areas</b> identified on Figure 2." iii) ... irreplaceable habitats such as <b>the ancient woodland</b> at Weston Big Wood...."	Amend wording to be more precise/accurate.
PEN 3 Flood risk and natural flood management	Potential conflict with NPPF para 159 as a sequential test needs to be followed if development is proposed in areas at risk of (any) flooding. The starting point is to avoid areas indicated to be at greater risk of any source of flooding, including surface water flooding. Only when it is demonstrated that development can take place in a higher risk area, should mitigation be considered. The policy as written could be taken to mean that development proposals are acceptable in areas at risk of surface water flooding.	Amend or delete this part of the policy to comply with NPPF.
Policy PEN5 Trees hedgerows and woodland	Arguably goes beyond NPPF (para 131) which just requires that planning policies and decisions should ensure that existing trees are retained "wherever possible". The following wording would more closely fit the NPPF "... design process with a view towards retaining and incorporating them as placemaking features in new development. Where possible they should be protected, without damage or loss of value, particularly those which demonstrate good arboricultural biodiversity value..."	Amend wording to more closely align with NPPF para 131.
Policy PEN6 Local Green Spaces	The Council considers that the local community is best placed to judge which local spaces are of importance to them and for what reason and protect them with appropriate policies, provided they meet the necessary criteria. Therefore the Council doesn't wish to comment on the historic or local significance of specific areas.	Very small, non-green areas of proposed LGS such as LGS 10 and LGS 13 would be more appropriately protected under other policies

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	<p>North Somerset Council has set out its own interpretation of the Local Green Space (LGS) designation, taking account of national guidance, in its <u>Background Paper on LGS 2016</u> . The Council considers that its interpretation is robust and defensible as tested through the Site Allocations Plan examination (adopted 2018) and meets the required standards for LGS designation e.g. in terms of criteria such as wildlife value, use and significance. As they are green spaces of particular local significance the Council would normally expect LGS to be at least 0.2 hectares in size, but this does not rule out smaller spaces where they are clearly shown to have particularly strong justification, normally requiring them to be out of the ordinary. The NSC methodology has therefore been found sound so ideally the Council would seek to apply this methodology and therefore consistency on how it is applied throughout the district for the purposes of neighbourhood plans. It is recognised that Neighbourhood Plan groups can however interpret this differently provided the designations are consistent with government guidance and maintain the high standards required of LGS.</p> <p>The NPPF para 101 and 102 refer to Local Green Spaces specifically as being “green spaces”, not predominantly hard standing. This may therefore call into question the proposed LGS which do not comply such as LGS10 and LGS13. Other NDP designations such as PWC1 could be used instead in recognition of the local significance of these spaces.</p> <p>A number of the LGS areas proposed through the Neighbourhood Plan are also much smaller than the NSC standard of 0.2ha.</p> <p>For spaces which would not meet the remit for LGS the neighbourhood plan policy PEN7 Other Green Spaces, could also apply (see comment on policy PEN7 below). As could PWC1 which also includes allotments listed as LGS in the neighbourhood plan. Between policies PEN6,</p>	<p>such as PWC1, or PEN7 (see comment below on PEN7).</p> <p>Remove the areas of proposed LGS already designated in the North Somerset Council Site Allocations Plan 2018 from the Neighbourhood Plan.</p>

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	<p>PEN7 and PWC1 the majority of open spaces within the Portishead Neighbourhood Area can be afforded some measure of protection.</p> <p>The Neighbourhood Plan evidence paper on Local Green Space appears to absorb the existing Site Allocations Plan LGS into the Portishead Neighbourhood Plan although this is not clear in the neighbourhood plan itself. It is this Council's view that the existing Local Green Space allocations which are already allocated in the adopted North Somerset Site Allocations Plan 2018 should be shown for information purposes only in the Neighbourhood Plan. This is the approach followed by other Neighbourhood Plans. The approach suggested by the neighbourhood plan evidence paper lays the existing areas of Local Green Space in Portishead open to renewed scrutiny when in fact they have already been demonstrated to be robust and sound through the Site Allocations Plan examination process and should therefore remain as allocated in the Site Allocations Plan. The additional descriptive information which has been put forward through the neighbourhood plan Local Green Space evidence paper in support of the some of the existing LGS designations can alternatively be incorporated into the emerging Local Plan LGS rationale.</p> <p>Table 1 set out comments on the proposed additional LGS with regard to North Somersets guidelines (sites have not been visited).</p>	
PEN7 Other green spaces	<p>Some of these do not appear to be "open" or "green spaces" e.g. religious grounds. Should they be protected under PWC1 instead? Or better to retitle "Other open spaces"</p> <p>Does "Saltmarsh open space" west of Marine Lake need to be protected here as it is already strongly protected as part of the Severn Estuary SPQ, SAC and RAMSAR.</p>	Protected by other policies. Or retitle policy "Other open spaces"

<b>Plan para/policy</b>	<b>NSC comment</b>	<b>Remedy</b>
Para 3.6	All listed buildings are of national importance, the current wording perhaps misleadingly infers that the Former Nautical School is the only one of national importance.	Reword to “national listing system”
Para 3.75	Listed buildings are designated by the Secretary of State, not historic England. “appointed” should read “designated” There is no separate paragraph on Listed Buildings or archaeology - perhaps missed out from a previous version? Para 3.77 doesn't make much sense without previous reference to Listed buildings.	Amend wording and include paragraph on Listed buildings.
Para 3.77	“Grade 1 or 2 listing” needs to include 2* (more important than 2) and scheduled monuments.	Amend wording
Para 3.79	Wording needs to be updated. A local list is now in place that can be added to by nominations. Not aware of any buildings/ structures identified in the neighbourhood plan having been nominated to date.	Update wording  None
Fig 12	Doesn't include the Lake Grounds which is an unregistered park and garden.	Update Figure 12 to include Lake Grounds as an unregistered park and garden
PEB1	A thorough site and context appraisal may not be appropriate for all small-scale development, including householder applications. There is no sound basis for requiring 9 out of the 12 criteria of the green indicators in Building for a Healthy Life Commendation to be met.	Qualification needed?  Amend wording to encourage this rather than requiring it.
PEB2	Final paragraph on biodiversity, although the intention is supported there is no explanation of how this might work in practice or be enforceable especially in relation to householder applications (bird box, bug hotel etc). In Portishead it seems difficult to justify that all household extensions and small infill developments should require ecological reports/biodiversity net gain. There are parts of Portishead which adjoin a SSSI and an SPA where it could be justified where	Rephrase as encourage rather than require.

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	demolition/construction could impact the protected sites, but not generally. Perhaps to be encouraged but not required.	
Policy PEB3: Local Heritage	<p>A. Designated Heritage Assets Should include the need to consult the North Somerset Historic Environment Record (HER) to check for known heritage assets and the potential for known or unknown Archaeology - this would be accordance with para 194 of the NPPF and out policies. Should include the Scheduled Monument</p> <p>B. Non-designated Heritage Assets First para should include the unregistered park and garden at the Lake Grounds. Should also include an assessment of the site's potential for archaeology, especially for a major application. The first step is consulting the Historic Environment Record (HER) and providing an archaeological desk based assessment with the application (DBA). Final paragraph - a Heritage Statement should be submitted with an impact assessment within it.</p>	Amend all wording accordingly.
PEB4	<p>The use of the net zero carbon toolkit can be encouraged, but policy requirements in excess of CS2 can't be enforced.</p> <p>Overheating is addressed now in part O of the building regulations so is superfluous in this policy</p>	Amend wording to encourage application of the net zero carbon toolkit rather than require it. Remove the reference to overheating from the policy.
<b>Housing</b>		
Para 4.36-4.42 and PWH5 First homes (and PWH3 New Housing to meet local needs)	First Homes is a delivery mechanism for affordable housing which is promoted by the Government. Its introduction post-dates the adoption of the North Somerset Core Strategy and associated plans. The inclusion of a first homes policy within the NDP therefore complies with the basic conditions. The emphasis on the policy however perhaps	Clarity needed that the affordable housing need in Portishead is for social rented, not First Homes.

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	<p>skews the perception of the nature of the housing need in Portishead.</p> <p>The Portishead Local Housing Needs Survey identified social rented housing as the most required from of affordable housing in Portishead with the largest proportion of responses, just over 27%, wanting more affordable social rented housing. This would imply that social rented accommodation should be the priority within Portishead. This is not made sufficiently clear in these supporting paragraphs.</p> <p>From the LHNA the affordability of the purchase price of properties in Portishead would imply that the best way to secure affordable housing is indeed social rented.</p> <p>North Somerset Council's affordable housing allocations policy is to offer social rented on the basis of highest need rather than local connection. The emphasis on First Homes within the Plan appears to be on the basis that this is the only available mechanism to apply a local lettings policy. An unintended consequence is that if developers chose to provide the affordable housing contribution via First Homes this will be at the expense of the alternative social rented which is the most needed tenure within Portishead.</p> <p>For these reasons North Somerset Council discourages the use of First Homes as a mechanism for delivering affordable housing within the District and are producing guidance to this effect in consultation with Bristol and Bath &amp; North East Somerset Councils.</p> <p>The policy should include the requirement of Paragraph: 008 Reference ID: 70-008-20210524 to put aside local connection criteria for members of the armed forces and veterans. The same guidance also suggests that key workers should be prioritised over local connection.</p>	<p>Should include exclusion of armed forces and veterans form the local lettings criteria and consider also excluding key workers as per First Homes guidance para 008</p>

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PWH1 Protection of Portishead's existing housing stock	Is the evidence strong enough to place a blanket ban on conversions to non-residential, even in town centres, or employment uses above shops etc?	Rephrase with caveats.
PWH2 Retaining existing valued smaller and accessible housing	The policy title doesn't match the policy outcomes. The policy wording relates to retaining character and amenity and there is no mention of accessibility in the policy.	Rephrase title to better reflect policy wording.
PWH3 New housing to meet local needs in Portishead	Bullets two and three -in each case it should be spelt out in the policy what that specific need is to provide clarity and to enable planning applications to be dealt with effectively. Otherwise the policy is not easy to implement.	Amend bullets two and three to specify the type of properties which are needed in Portishead.
PWH4 Making housing available to local people in housing need	<p>Although the intention of the policy is understood it's not clear how it will be implemented, or whether the reference to open market housing is justified or reasonable.</p> <p>How will encouragement be given? Will the Town Council approach housebuilders directly?</p> <p>This type of local restriction would normally be dealt with via a legal agreement on a planning consent for certain types of affordable housing, but this does not appear to be justified or reasonable for open market housing. This approach appears more relevant to remote rural communities where local residents who provide services are priced out by weekend home purchases or retirees from more affluent areas. Is there evidence other than affordability, that Portishead residents are significantly less able to access housing in Portishead than people living elsewhere? The words "open market" should therefore be removed from the first sentence and the final paragraph therefore include reference to criteria i-iv.</p> <p>The Plan gives the impression that the priority is to secure homes for existing residents, but this would be at the expense of allowing people who have secured work within the town but live elsewhere to be able to</p>	<p>Amend policy to remove open market from the first paragraph and instead insert a reference to criteria i-iv into the last paragraph.</p> <p>Add the government exceptions to the local connections criteria.</p> <p>Explain how "encouragement will be given" in the supporting text. Or change wording to support for proposals which.....</p>



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	<p>relocate closer to work. The policy could allow people wishing to move to the area to set out why, (with evidence e.g. of a job offer for a permanent post), for employment purposes they need to move to the area.</p> <p>The criteria should include the requirement of Paragraph: 008 Reference ID: 70-008-20210524 <a href="https://www.gov.uk/guidance/first-homes#first-homes-eligibility-criteria">https://www.gov.uk/guidance/first-homes#first-homes-eligibility-criteria</a> to put aside local connection criteria for members of the armed forces and veterans. The same guidance also suggests that key workers should be prioritised over local connection. There is a risk of unintended consequences of discouraging key workers being able to move to the area to provide services.</p>	
PWH5 First homes	See above comments	As above
PWH6 Homes for the elderly disabled or vulnerable	Query whether residential nursing homes have the same need to be 10 mins walk from facilities.	Remove residential nursing homes from policy
PWH7 Adaptable new homes	For the policy to be effective and workable it should state in what way the development should be in conformity with the Portishead LHNA.	State the specifics of the LHNA which proposals need to respond to.
PWH8 Alterations to make existing homes more accessible	Does not explain the connection to car parking and whether this is reasonable given the overriding objective of the policy.	Remove or justify final bullet
PWH10 Self build and custom build	<p>PWH10 is based upon North Somerset Councils draft Local Plan Preferred Options 2038 policy DP46. North Somerset Council supports the promotion of self build and custom build housing as evidence by draft policy DP46. This policy will be viability tested prior to moving to the next stage of plan-making but it has not so far been assessed. The neighbourhood plan policy requirement, in particular the threshold of 50 homes does not appear to have been viability tested and therefore may not be reasonable or capable of implementation</p> <p>The neighbourhood plan makes no site allocations and so there is</p>	Remove policy

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	nothing within the neighbourhood plan for this policy to apply to. It is not reasonable to retrospectively apply PWH10 to existing sites allocated in the adopted North Somerset Site Allocations Plan which haven't been subject to this level of viability scrutiny.	
PWH11 subdivision and conversion of larger properties	Needs definition of "large" in order to be implementable. Bullet six. Generally locations within the town are relatively well located to facilities etc relative to locations outside the town boundary, so not sure how this would be applied. Final bullet – correct title is "North Somerset Council Parking Standards Supplementary Planning Document November 2021"	Define "larger". Consider removing penultimate bullet.  Correct title in final bullet.
<b>Economy</b>		
5.18 and figure 14 and policy PPE1	Figure 14 only identifies broad locations and not uses and it isn't clear from the notation where the boundary of the sites, or the businesses themselves are and may in fact relate to areas which are now housing. It would be clearer to list the names the locations are known by e.g. Portis Fields Middle Bridge Business Park, Harbour Road Trading Estate and others, otherwise the policy will be difficult to operate and doesn't add to existing policy context (other than updating the use class reference). The policy as written wouldn't presumably apply to other businesses elsewhere in Portishead, unlike NSC Site Allocations Plan policy SA4. Does the Business Survey Analysis support this approach and these locations?	List locations and more specific map references in order for the policy to be effective.
5.24	As there is no policy within the Neighbourhood Plan perhaps this sentence is misleading and could be rephrased "The Community Action for Wyndham Way Study Area sets out the community's aspirations for this area"	Rephrase sentence to more accurately reflect neighbourhood plan content.
PPE2 Supporting Business investment and start-ups	May be confusing to refer to tourism and leisure as the policy refers to business investment and start-ups.	Rephrase to remove tourism and leisure reference
P106 Context	Para numbering missing	Add para numbering

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Supporting Low carbon businesses Para 2	Is it the Town Council or policy PPE3 which actually supports this?	For greater clarity rephrase to “Policy PPE3 supports development proposals...”
PPE3 Supporting low carbon local businesses	First para- unclear how this will be measured. Examples could be given in the supporting text to of in what way this could be achieved to comply with the North Somerset Climate Emergency Strategic Action Plan.	Some indication of this will be measure could be added to increase the effectiveness of the policy.
5.27-5.29 and policy PPE4 Digital connectivity and telecommunications.	<p>The policy wording could be a little clearer in order to be effective. From the way that this is written it suggests that development proposals must contribute to all three (residents, businesses and community facilities) in order to be supported whereas the point that is trying to be made is that development proposals which contribute to any of these three will be supported. What development is the policy referring to and how is “state of the art” to be defined. The proposal is not “state of the art” would it not be supported?</p> <p>An increasing number of telecommunication operations are permitted development so the policy may have limited application.</p>	Suggest replacing “and” with “and/or” and removing “state of the art”
PPE5 Homeworking and live work units	Although the intention is supported, this policy will be difficult to apply. There is no definition within the policy of homeworking or live work units and how this should be assessed in a planning application. A live/work unit is different to working from home as usually it involves a specific planning consent requiring a business to be run from the property at the same time as it having a residential use. It isn’t reasonable to state that all new housing development should be designed to enable them to be live/work units (in fact the planning consent would have to specify this, rather than “enabled” at a later date), nor has it been justified by evidence.	<p>Suggest deletion of the policy as it is unimplementable as written.</p> <p>Criteria in second paragraph of the policy are covered in other policies elsewhere in the Plan.</p>

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	<p>In the case of homeworking, for some, home working will be possible from a spare bedroom, kitchen table, or outbuilding and be possible without requiring a separate planning consent. Affordability of the property will also influence the type of house purchased/rented. As will speed of internet connection. National Space Standards already set a benchmark for room sizes etc.</p> <p>A previous policy in the North Somerset Replacement Local Plan attempted this approach with an extensive guidance note, however the policy was difficult to apply in practice and enforcement almost impossible and the policy was not perpetuated in subsequent Plans.</p> <p>Is this policy compatible with the Plans other aim of retaining smaller and accessible properties? There is a tension between providing support to expand properties to enable comfortable working from home, but also wanting to retain smaller homes (PWH2)</p>	
<b>Transport</b>		
5.34	Add a link to the “North Somerset Climate Emergency Action Plan”	Add link
5.34	Should reference and link to the North Somerset Active Travel Strategy. <u><a href="http://north-somerset.gov.uk">North Somerset Council Active Travel Strategy 2020 – 2030 (n-somerset.gov.uk)</a></u>	Reference and link to the North Somerset Active Travel Strategy.
5.39	“Improvements to <b>the/our</b> public transport network.....”	Minor amendment
PPT1 Inclusive and active travel	<p>Supporting text should reference and link to the North Somerset Active Travel Strategy. <u><a href="http://north-somerset.gov.uk">North Somerset Council Active Travel Strategy 2020 – 2030 (n-somerset.gov.uk)</a></u></p> <p>Supported in principle, but is it reasonable for this policy to apply to all planning applications and uses including householder applications? Should a home extension have to contribute even proportionately?</p> <p>Additional wording suggested to improve the effectiveness of the policy. ‘.....integrate public transport services and achieve accessible and safe</p>	<p>Supporting text- Include reference and link to the North Somerset Active Travel Strategy.</p> <p>Include exceptions to the policy or explain in the supporting text?</p> <p>Add additional wording re public transport services.</p>

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	pedestrian connections of no more than 400m or 5 minutes safe and convenient walking distance to an active bus stop <b>with an appropriate level of service'</b>	
5.47	Link to Green and Blue Infrastructure report should be provided.	Include link
Policy PPT3	'...will only be supported where they conform with the <b>North Somerset Council Parking Standards Supplementary Planning Document (2021)</b> ' – no need for 'revised'	Remove "revised"
5.57	The text/link to the parking SPD states (2020), this should be (2021)	Amend SPD date
Policy PPT5	The sentence is very long, suggest a full stop after "associated with development". <b>Proposals should address the assessed...."</b>	Consider amending sentence construction.
Policy PTC3 Town Centre Housing	Policy does not accord with national policy. Use Class E permits residential use on ground floors, so the policy as a whole is superfluous as well as contradictory to national guidance. How is a viable town centre use to be measured? National policy is to encourage residential use in town centres for reasons of vitality and diversity.	Remove. Policy does not accord with national planning policy.

**Table 1 North Somerset Council comments on proposed Local Green Space allocations**

Site		Comment
Field with Play Area, Underwood Road	LGS1	Wider field is 0.27ha so large enough for LGS, regarding <u>Background Paper on LGS 2016</u> . However the actual play area is not, at just 0.02ha, and inclusion of wider field is questionable if it is agricultural land (para 3.4 of Background Paper says LGS would not normally include agricultural land.)
Slade Road ground	LGS2	Area 0.8 ha so large enough for LGS, regarding Background paper on LGS
Potager garden	LGS3	Area is too small regarding the Background Paper, being 0.08ha. (Under 0.2ha)
Mead Road play area	LGS4	0.21ha including peripheral treed area, so large enough for LGS, regarding Background paper on LGS. Potentially might meet recreation and beauty criteria.

<b>Site</b>		<b>Comment</b>
Tommy Broom memorial and green space	LGS5	Area is too small regarding the Background Paper, being 0.04ha.
Lower Down Road Allotments	LGS6	Para 2.12 of Background Paper on LGS states that allotments will not normally be appropriate for LGS designation. Approx 1ha.
Gertie Gales Allotments	LGS7	Para 2.12 of Background Paper on LGS states that allotments will not normally be appropriate for LGS designation.
Beach Hill Allotments	LGS8	Para 2.12 of Background Paper on LGS states that allotments will not normally be appropriate for LGS designation. Size 0.55 ha approx.
North Weston Allotments	LGS9	Para 2.12 of Background Paper on LGS states that allotments will not normally be appropriate for LGS designation.
Island in West Hill with tree	LGS10	Area is too small regarding the Background Paper, being 0.006ha.
Memorial garden, Brampton Way	LGS11	Area is too small regarding the Background Paper, being 0.03ha.
Viewing Point, Woodlands Road and Royal Inn Wooded Area	LGS12	Precise boundaries uncertain from map. Just the small, concreted viewing point may be too small, regarding Background paper on LGS. but the wider wooded LGS13 area appears to be well over 0.2 ha. Potentially might meet recreation and beauty criteria.
Lorymer's Park, Nore Rd	LGS13	Area is too small regarding the Background Paper, being 0.007ha.
Sorrel gardens and play area	LGS14	0.21ha so just large enough for LGS, regarding Background paper on LGS. Potentially might meet recreation and beauty criteria.
Marjoram Way playing field	LGS15	Area is 0.33ha. May be ok for LGS designation if accessible and not a fenced off part of nearby Trinity school. Potentially might meet recreation criterion.
The Park, nr Tydeman Rd	LGS16	Area is too small regarding the Background Paper, being about 0.1ha.
Paper Mill play area	LGS17	0.21ha so just large enough for LGS, regarding Background paper on LGS. Potentially might meet recreation and beauty criteria.

Site		Comment
South View Allotments	LGS18	Para 2.12 of Background Paper on LGS states that allotments will not normally be appropriate for LGS designation.
Hallets Way park	LGS19	0.33ha, so large enough for LGS, regarding Background paper on LGS. Potentially might meet recreation and beauty criteria. Includes play area.
Brampton Way playground	LGS20	0.23ha approx., so large enough for LGS, regarding Background paper on LGS. Potentially might meet recreation and beauty criteria.
Winford Close	LGS21	0.25ha so large enough for LGS, regarding Background paper on LGS. Potentially might meet recreation and beauty criteria.
Nightingale Rise and Weatherley Drive play park	LGS22	1.46ha so large enough for LGS, regarding Background paper on LGS. Potentially might meet recreation and beauty criteria.
Charlecombe Rise play park and green space	LGS23	0.75ha so large enough for LGS, regarding Background paper on LGS. Potentially might meet recreation and beauty criteria.
Avon Way green space and play park	LGS24	0.27ha so large enough for LGS regarding Background paper on LGS. Potentially might meet recreation and beauty criteria.
Black Nore Lighthouse Green Space	LGS25	0.42ha approx., so large enough for LGS, regarding Background paper on LGS. Potentially might meet recreation and beauty criteria.
Sheepway roundabout community orchard	LGS26	Area is too small regarding the Background Paper, being 0.12ha.
Village Quarter Ecology Park	LGS27	Approx 1.3ha even excluding pond so large enough for LGS, regarding Background paper on LGS. Potentially might meet recreation and beauty criteria, though site not visited. Map seems to exclude pond but description in NDP seems to include it.
Fore Hill & Lyes Orchard	LGS28	This area is approx. 7.58ha so large enough for LGS, regarding Background paper on LGS. However, though largely a Local wildlife site, and including some large treed areas, it appears likely on Council's Earthlight mapping that much of the site might comprise agricultural land. Para 3.4 of Background Paper says LGS would not normally include agricultural land.

Heron Gardens	LGS29	0.64ha so large enough for LGS, regarding Background paper on LGS. Potentially might meet recreation and beauty criteria.
Spanish steps	LGS 30	0.25ha so large enough for LGS, regarding Background paper on LGS. Potentially might meet recreation and beauty criteria.