

Portishead Neighbourhood Plan

Summary of the representations received at Regulation 16 consultation

This document summarises the comments received by North Somerset Council on the Portishead Neighbourhood Plan that was submitted for independent examination.

Background

The Portishead Neighbourhood Plan was submitted for independent examination on 8 August 2022. It was then publicised by North Somerset Council for a six week period of consultation between Wednesday 5 October and Friday 18 November 2022. This is known as “submission consultation” or Regulation 16 consultation. Comments received were forwarded in full to the examiner for consideration.

A second period of Regulation 16 consultation was carried out at the examiners request from 31 January 2023 to 21 February 2023, the purpose of which was to consult on a revised map (Figure 14) of locally valued employment sites submitted by Portishead Town council during the examination.

The below is a summary of the representations received to each of these Regulation 16 consultation periods. The full representations can be viewed either by visiting the respective consultation webpages for either the [first consultation](#) or [the second consultation](#). Or in the separate document provided with the referendum documents. As the comments received to the first consultation were very diverse it is advisable to view the full comments to get a complete picture.

The Portishead Neighbourhood Plan Submission consultation 5 October 2022 to 18 November 2023

138 comments were received from 36 individuals or organisations. The comments were wide-ranging from short comments in support of the Plan to detailed lengthy suggestions for changes. They were spread across the majority of the plan, comments being received on many of the policies.

The full representations can be viewed either by visiting the consultation web page via <http://www.n-somerset.gov.uk/portisheadplan> or in the separate consultation response document provided with the referendum documents. As the comments received were very diverse it is advisable to view the full comments to get a complete picture.

Policy titles and numbering below relate to the submission plan and some of these may have been changed as a result of the examination.

Neighbourhood Plan policy	Number of comments
Introduction	40
Natural environment policies	34
PEN1 Landscape setting and views	5

PEN2 Portishead's Green and Blue Infrastructure	5
PEN3 Flood Risk and Natural Flood Management	4
PEN4 Biodiversity	4
PEN5 Trees Hedgerows and Woodland	6
PEN6 Designation of Local Green Spaces	7
PEN7 Other Green Spaces	3
Built environment policies	9
PEB1 Locally distinctive high quality design	2
PEB2 Small and infill development	2
PEB3 Local Heritage	4
PEB4 Sustainable design, construction and retrofitting	1
Renewable energy	1
PER1 Supporting renewable and low carbon energy schemes in Portishead	1
Community facilities and infrastructure	5
PWC1 Protection of existing community facilities and infrastructure	4
PWC1 New community facilities and infrastructure	1
Housing	13
PWH1 Protection of Portishead's existing housing stock	2
PWH2 Retaining existing valued and smaller and accessible housing stock	0
PWH3 New housing to meet local needs	4
PWH4 Making housing available to local people in housing need	2
PWH5 First homes discount in Portishead	2
PWH6 Homes for elderly, disabled and vulnerable people	0
PWH7 Adaptable new homes	0
PWH8 Alterations to make existing homes accessible	0
PWH9 Community led development projects	1
PWH10 Self build and custom build housing	2
PWH11 Sub-divisions and conversions of larger residential property	0
Economy	4
PPE1 Protecting Portishead's valued employment space	3
PPE2 Supporting business investment, start-ups and low carbon business enterprise	1
PPE3 Supporting low carbon businesses	0
PPE4 Digital connectivity and telecommunications	0
PPE5 Homeworking and live work units	0
Transport	17
PPT1 Inclusive active travel	7
PPT2 encouraging active travel for leisure and recreation	3
PPT3 Supporting the shift to ultra-low emissions vehicles	2
PPT4 Parking	2
PPT5 Highways impacts and securing highway safety	1
PPT6 Development proposals and travel planning	2
Area based policies and community actions	6

Wyndham Way Study Area	3
PTC1 Protection of Portishead Town Centre character and viability	1
PTC2 Business use of upper floors	0
PTC3 Town centre housing	1
PTC4 Keeping the town centre accessible	0
PTC5 Shopfronts and signage	0
Town centre community actions	0
Appendix 1 Local evidence base list	0
Appendix 2 The Portishead Pre-application community engagement protocol	0
Appendix 3 Proposed Portishead Settlement boundary	1
Bibliography	2
Site submissions	2

The natural environment section received the most comments of any section and the largest number of these in turn was to policy PEN6 designation of Local Green Spaces (LGS). One of these comments was an objection to an area proposed as LGS and North Somerset Council raised concerns that some of the proposed areas did not meet the NPPF definition. There was generally strong support for the natural environment policies which protected the existing natural environment. There were suggested amendments to the local views report which underpins PEN1, that the requirement for 10% biodiversity net gain on policy PEN4 biodiversity was not yet set out in national guidance and there was no justification for the size of the buffer zones in policy PEN5 Trees and hedgerows or the extent of tree canopy required.

The built environment section had relatively few comments with support for greater sustainability. Concern was expressed about the blanket application of policy PEB1.

Comments on the housing section ranged from concern that reliance on the Core Strategy was misguided as housing policies were found to be out of date and concerns over viability and from North Somerset Council a concern over the emphasis on First Homes.

Only four comments were received on the economy policies, however PPE1 protecting Portishead's existing employment space was the subject of objection that it was overprotective and not justified.

The transport section received 17 comments in total. Seven related PPT1 and in part to support for re-opening of the Portishead to Bristol railway line, although this is not a proposal of the Plan. Support was given for developments which support the active travel network, but concern that PPT4 Parking simply repeats North Somerset Council policy.

There were very few comments on the area-based policies and community actions. Concern was raised however over the consistency of the Neighbourhood Plan which supports redevelopment of the Wyndham Way Study Area, but also seeks to protect existing employment and town centre uses which in itself could hinder regeneration

taking place. Concern was expressed that regeneration within this area would only be likely to occur on a piecemeal way.

Two site submissions were suggested should be included in the Neighbourhood Plan, One known as Block Rock for 7.65 hectares adjacent to the Clevedon Road and west of the settlement edge of North Weston, for housing and the other south of Clevedon Road opposite Gordano School also for housing.

North Somerset Council comments

North Somerset Council also provided comments to the examiner in relation to conformity with and correctly referencing the Local Plan, environment policies, housing policies, economy policies and transport. In many cases these related to the need to avoid duplication or conflict with the NPPF (e.g. PEN3 flood risk and PEN5 Trees and hedgerows and PEN6 Local Green Spaces, on which North Somerset Council made extensive comments) or Local Plan strategic policies (eg PEB4 sustainable design and construction, PWH10 Self build, PPE1 protecting Portishead's valued employment space) or the suggested removal of policies which strayed beyond a planning remit eg. PTC3 Town centre housing. In many cases comments were in relation to text which needed clarification in order to enable the policies to be used effectively.

The full North Somerset Council comments can be viewed at www.n-somerset.gov.uk/portisheadplan

Portishead Neighbourhood Plan additional Regulation 16 consultation 31 January to 21 February 2023

The examiner requested that the neighbourhood plan group prepare a revised Figure 14 (Map of valued employment sites) to show precise boundaries of the sites which will be subject to policy PPE1.

This was submitted along with a supporting explanatory note and amendment on 27 January 2022. Details of this consultation can be viewed on the [consultation webpage](#).

Eleven comments were received in response to the revised map Figure 14. Six of these were from statutory consultation bodies (Environment Agency, National Highways, Natural England, Coal Authority, Historic England and Exolum Pipeline Systems) who either had no comment or no objection.

Of the other responses two were not directly related to the revisions to Figure 14 and two stated that old Mill Road should be added to the list of "Valued employment sites" protected under policy PPE1. One response objected to the protectionist nature of policy PPE1 stating there was no justification for this approach.

North Somerset Councils comments

These emphasised the need for clarification in the policy and supporting text that PPE1 does not supercede Site Allocations Plan policy SA4, but adds local detail. Also that more legible mapping is needed.