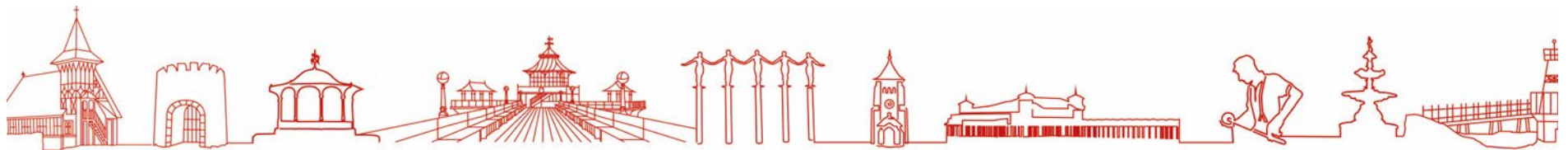




North Somerset Local Plan 2039

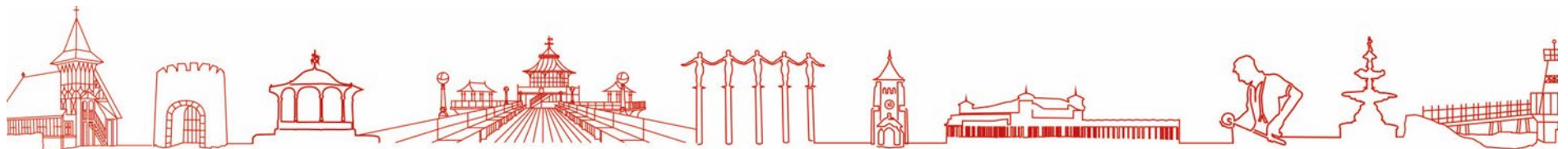
Consultation Statement

May 2024



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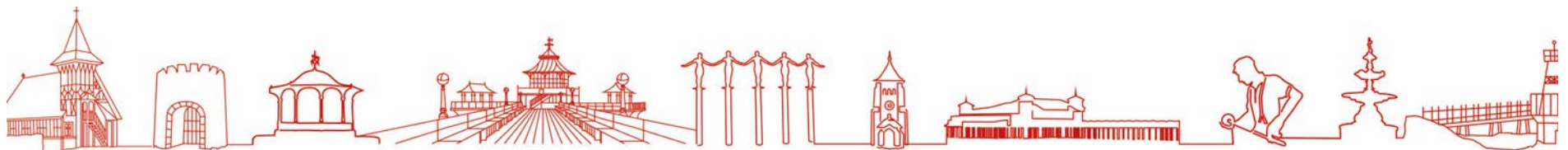
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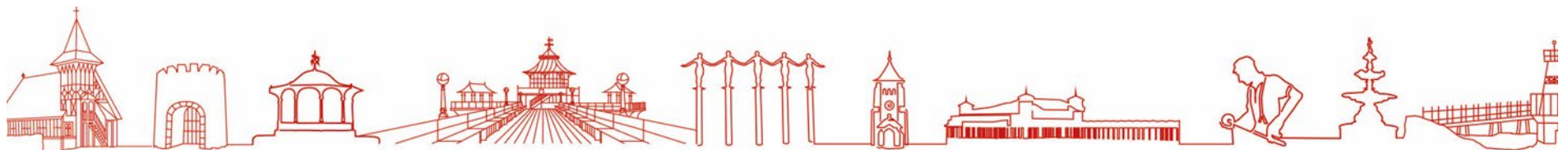
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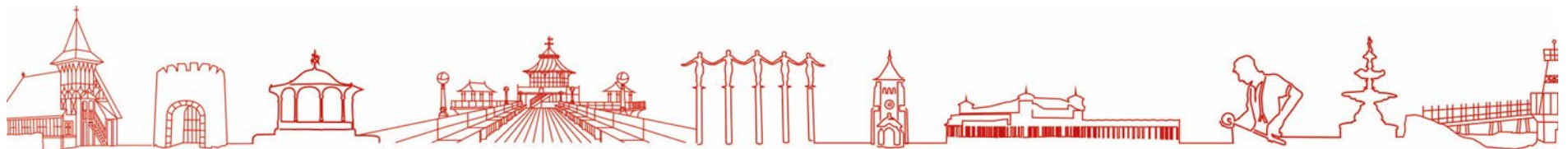
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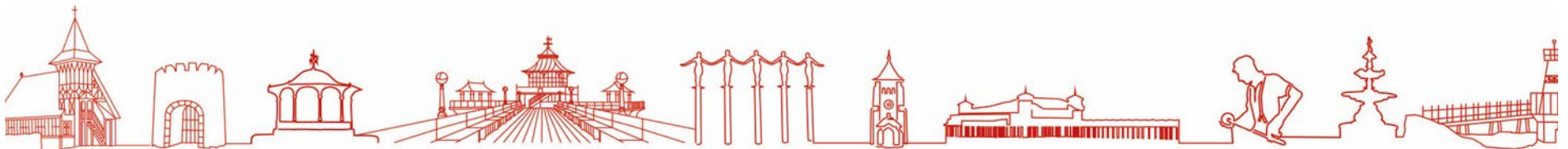
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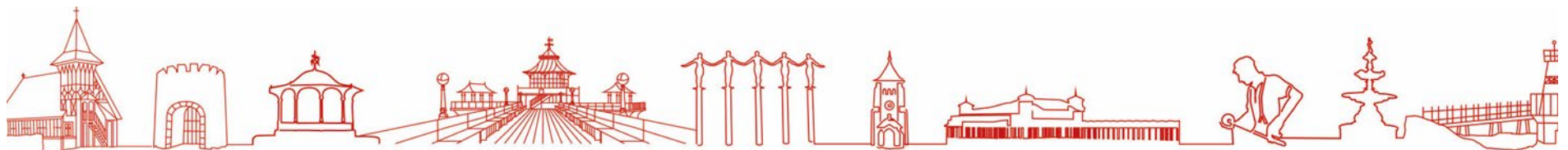
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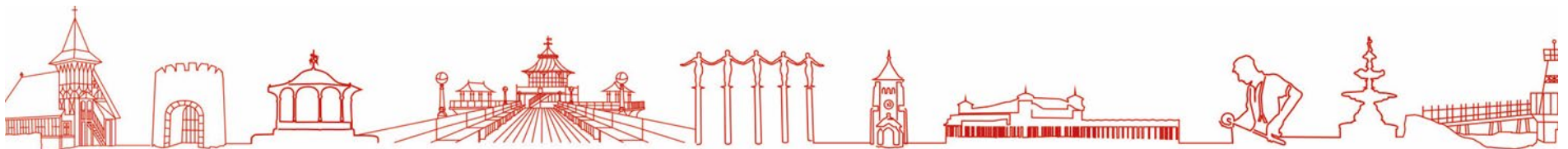


1. Introduction

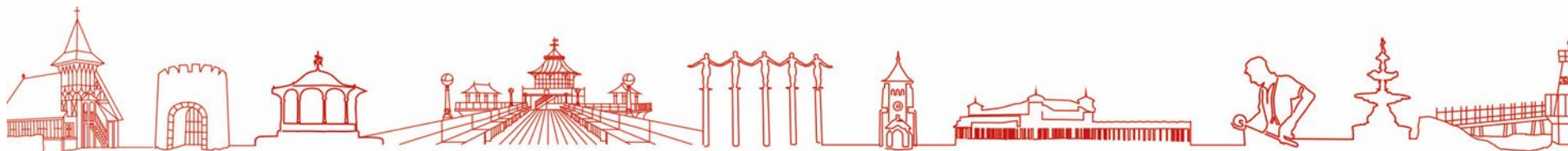
- 1.1 This document explains how North Somerset Council undertook consultation on the North Somerset Local Plan 2039: Pre-submission (Reg 19) Plan. It sets out how the Council engaged with communities and stakeholders across North Somerset. It covers:
- Which bodies and persons were invited to make comments.
 - How those bodies and persons were invited to make comment.
 - The material that was subject to consultation.
 - A summary of the issues raised.
 - How the comments received will shape the next version of the plan.
- 1.2 This consultation statement complies with the North Somerset's [Statement of Community Involvement \(SCI\) 2019](#). The SCI outlines that the Council is committed to effective community engagement and seeks to use a wide range of methods for involving the community in the plan making process.
- 1.3 It sets out how the Council will involve the community and stakeholders in the preparation, alteration and review of local planning policy and the consideration of planning applications. The SCI proposed that the consultation methods and those engaged would vary according to the purpose of the consultation and the bodies or persons who the Council were keen to involve.

Background

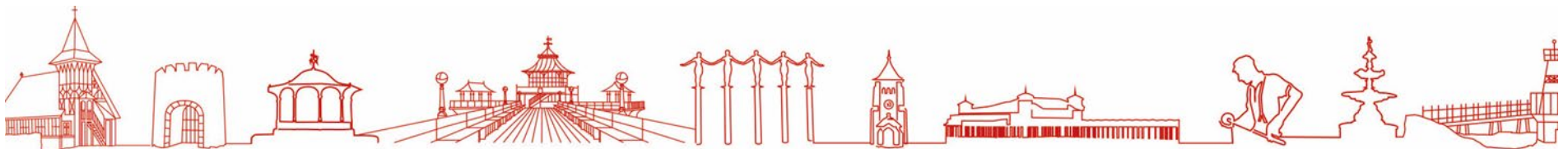
- 1.4 The new Local Plan for North Somerset was launched in March 2020 with the publication of the Local Development Scheme (LDS), which set out the timetable for the Local Plan, and the [Pre-commencement Document](#) which outlined the proposed scope of the content. These two publications marked the formal start of the process. Consultation on the Pre-commencement document ran from **10 March until 22 April 2020**.
- 1.5 Following the launch of the new Local Plan two consultations were undertaken focusing on the challenges the Local Plan would have to address and the various choices on how spatially the plan could address these challenges. The two consultations were called Challenges for the Future and Choices for the Future.



- 1.6 The [Challenges for the Future](#) consultation focused on the key high level issues facing North Somerset over the plan period such as the climate emergency, provision of housing, supporting the economy, creating sustainable development, the future role of the Green Belt and protecting the natural environment. The document also included a proposed vision and strategic priorities. This consultation took place from **22 July to 2 September 2020**. It sought the views of local communities, businesses, and the development industry on issues the Local Plan would need to address, and the responses received helped to inform the second stage of consultation which focused on the choices around the strategic approach to new development.
- 1.7 The [Choices for the Future](#) document set out four broad spatial development alternatives for discussion. This consultation took place from **2 November – 14 December 2020**. The four spatial options that were consulted on were Retain the Green Belt, Urban Focus, Transport Corridors and Greater Dispersal. Overall, taking ‘strongly support’ and ‘support’ together, Urban Focus was most favoured by respondents, although Retain Green Belt was very close behind and scored better in terms of ‘strongly support’. Transport Corridors was roughly 50/50 in terms of overall support/objection. The Greater Dispersal approach was significantly less well supported.
- 1.8 The response to the Challenges and Choices consultations and an assessment of emerging evidence enabled the formulation of a ‘spatial strategy’ which would provide the framework for the next stage of plan preparation. The spatial strategy was agreed by Executive Committee on 28 April 2021 for further testing and assessment and to act as the framework for the preparation of the Preferred Options document.
- 1.9 The Local Plan [Preferred Options consultation document](#), along with many supporting documents, which provided the evidence and justification for the policies and allocations within the emerging plan, was the first full draft of a new Local Plan. Public consultation took place from **14 March until 29 April 2022**. It contained:
- Strategic Policies: These policies set out the overall strategy for the pattern, scale and design of places, make sufficient provision for housing, employment and other uses, infrastructure, community facilities, conservation and the enhancement of the built and historic environment and address climate change and mitigation. These are high level policies which provide the framework for more detailed policies in the plan and for neighbourhood plans.
 - Locational Policies: These comprise allocations and other designations which are identified on the Policies Map.



- **Development Policies:** These are the detailed development management policies which cover a wide range of issues including design, residential infilling, climate change, net zero construction, renewable energy, drainage, transport, economic development, town centres, green infrastructure, affordable housing, rural development and infrastructure delivery.
- 1.10 The purpose of the Preferred Options consultation was to gather feedback on the first full draft of the new Local Plan and the proposed spatial strategy including the proposed allocations and the new and reviewed policies from a wide range of stakeholders (such as residents, businesses, community groups, town and parish councils, and house builders) and identify issues and potential amendments. The responses received are set out in the Consultation Statement (August 2022).
- 1.11 On 7 September 2022, following consideration of the responses to the Preferred Options consultation, the Council's Executive Committee requested that the revised local plan should be developed recognising the constrained nature of North Somerset, offering greater protection to Green Belt and other sensitive sites.
- 1.12 Later that year, in December 2022, consultation on the national planning reforms took place. This included anticipated changes to the National Planning Policy Framework (NPPF) in relation to two topics of particular significance to North Somerset; the derivation of the housing requirement and the approach to using Green Belt and other significant constraints.
- 1.13 The above factors set the context for the preparation of the [Pre-submission \(Reg 19\) version](#) of the plan which was consulted on between **27 November 2023 and 22 January 2024**. This represented the culmination of the plan-making process in that it was the plan which the Council intended to submit for examination. A local plan is required to cover 15 years from adoption and as such the plan period for the pre-submission plan was adjusted to 2024-2039.
- 1.14 This Consultation Statement sets out the consultation process for the Pre-submission Plan 2039 (Reg 19) in terms of who was consulted and how we consulted, as well as the level of response and a summary of the key issues raised for each policy and allocation.



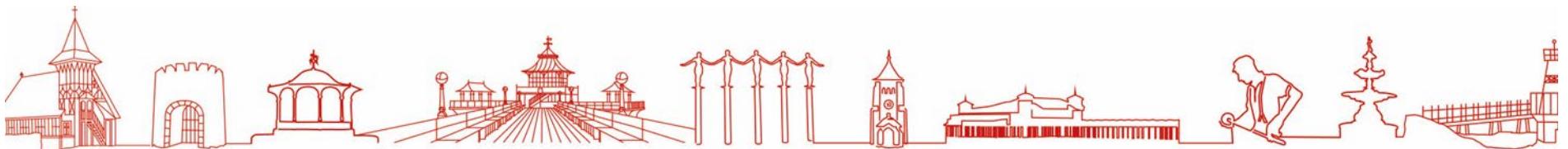
2. The Consultation Process

Explaining the process

- 2.1 The Pre-submission Plan consultation is known as the Regulation 19 stage in the plan-making process. This is a specific stage in the process and is different to previous stages. Regulation 19 is part of the [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#). It says that, before submitting a draft Local Plan to the Government's Planning Inspectorate for independent examination, the council must publish a draft of the Local Plan and formally invite representations on it. This consultation is different to the previous three consultation stages in that the Government asks you to consider whether the Local Plan policies are:
- Legally Compliant - does the plan meet the legal requirements made under various statutes?
 - Sound - has the plan been positively prepared, is it justified, effective, and consistent with national policy?
 - Meet the Duty to Cooperate - has the council engaged and worked effectively with neighbouring authorities and statutory bodies?
- 2.2 This means that specifically, we were asking people to consider whether the policies and proposals in the Plan meet any of these tests when making a comment. More details were provided in the ["How to respond to the Local Plan consultation"](#) guide on the online consultation platform and our website.

Who was consulted?

- 2.3 When consulting on a local plan it is important to have a robust consultation process that allows for contributions from all ages and interests across the district and is open and transparent.
- 2.4 With that in mind the aim was to hear from as wide a range of people as possible including young people, businesses, community groups, interest groups, town and parish councils, landowners, housebuilders, transport providers, retailers and anyone else who wanted to contribute.



2.5 Consulting with these groups was undertaken through a variety of means including emailing nearly 5000 people on the planning policy database, press releases, posts on social media and a briefings and meetings with various stakeholder groups.

How we consulted.

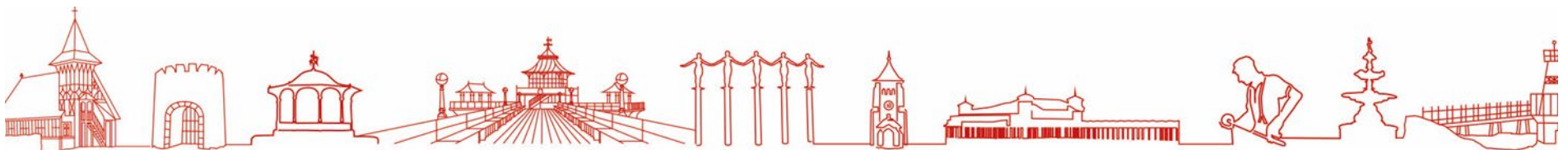
2.6 The consultation on the Local Plan 2039: Pre-submission Plan commenced on 27 November 2023 and ran for 8 weeks until 22 January 2024. The longer consultation period was to allow more time for people to submit responses as the consultation ran over the Christmas holiday period. During this period a range of consultation methods were used to inform the public of the consultation and maintain interest and momentum in the process. The following methods were used to consult:

Press/publications/information

- Article published on [15 December 2023](#) in North Somerset Life online publication E-life which reaches approximately 97,000 people across North Somerset.
- Articles were also put in 'In North Somerset' (newsletter for the business community), Noticeboard (newsletter for schools), The Knowledge (internal newsletter for North Somerset Council), Members Only (newsletter for Members), Town and Parish Digest (newsletter for towns and parishes).
- Media releases throughout the consultation period.

Social Media

- A video advert on Instagram targeting young people aged between 16-30. This ran from 18/12/2023 for 35 days and reached 18,114 people.
- Four themed posts were released during the consultation period covering various issues addressed in the Local Plan. The average reach of these posts were 25,000 accounts. The themed posts were:
 - Housing – released on 9/12/2023 for 7 days and reached 24,798 people.
 - Jobs and economy – released on 15/12/2023 for 7 days and reached 18,114 people.
 - Historic and natural environment – released on 5/1/2024 for 7 days and reached 29,731 people
 - Wolverhill Strategic Development Location – released on 12/1/2024 for 10 days and reached 34,755 people.



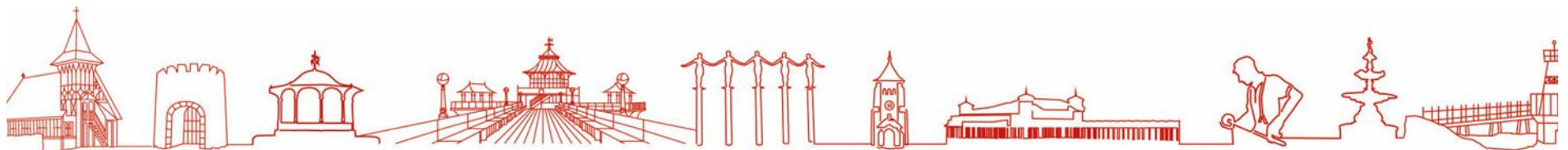
Website and online consultation

- The Council's Local Plan [webpages](#) contained all the details relevant to the consultation including a link to the online consultation system where people could comment on the policies and sites set out in the document online.
- This information, with a link to the website and to the online consultation system, was sent out to 5,529 stakeholders who were registered on the Planning Policy database on 27 November 2023. The database includes parish councils, adjacent authorities and parishes, planning agents, statutory consultees, local pressure groups and organisations as well as individuals/residents.
- Further reminder e-mails were sent out on 5 January 2024 and 19 January 2024 to all the stakeholders on our database to remind and encourage people to respond.

Meetings with stakeholders

There were a number of meetings with stakeholders which took place to discuss the issues identified and to explore amendments to be included in the Pre-submission plan. These included:

- Disability Access Group – 15 November 2023. Attended their in-person meeting to give an update on the Local Plan and inform about the upcoming consultation.
- Agents Forum – 7 December 2023. Online meeting briefing local agents on the contents on the local plan and advising how to respond.
- Town and Parish Council Workshop – 14 December 2023. Online meeting briefing local agents on the contents on the local plan and advising how to respond.
- Commercial Developers – 24 August 2023.
- Regular meetings with neighbouring authorities, statutory consultees and other key stakeholders to alert them to the upcoming consultation and discuss key issues through the duty to co-operate.



3. The Level of Response

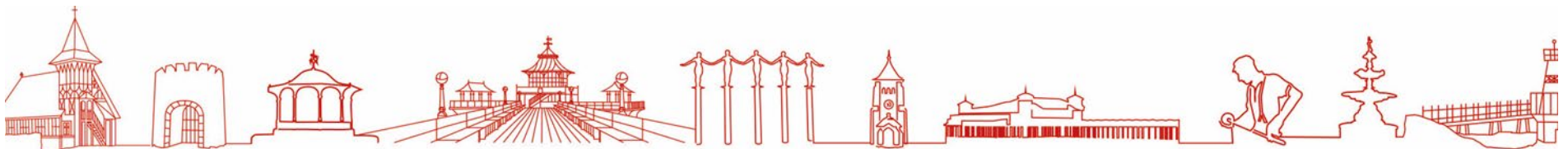
Level of response.

3.1 There were 560 respondents to the consultation with a total of 2198 comments. Of the 560 around 98 respondents submitted their representation by e-mail and the remaining respondents responded online. All comments are available to view on our [online consultation system](#) either against each policy within the document or for each respondent.

Town and Parish Councils

3.2 Twenty town and parish councils responded to the consultation (out of 39) with many of their comments mirroring the responses of the wider community within each area. Those that responded were:

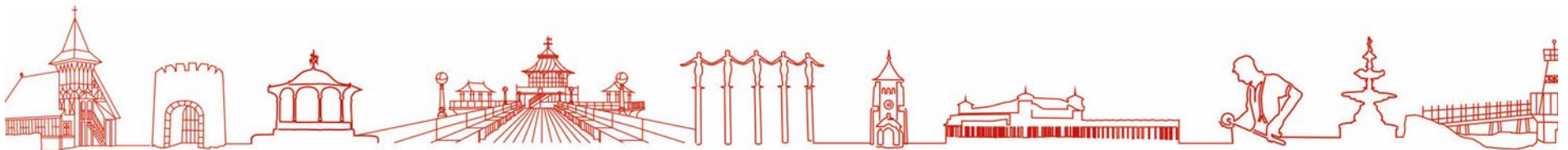
- Abbots Leigh Parish Council
- Backwell Parish Council supported by Backwell Residents Association
- Bleadon Parish Council
- Brockley Parish Council
- Burrington Parish Council
- Butcombe Parish Council
- Churchill Parish Council
- Cleeve Parish Council
- Clevedon Town Council
- Easton-in-Gordano Parish Council
- Flax Bourton Parish Council
- Kewstoke Parish Council
- Locking Parish Council
- Long Ashton Parish Council
- Nailsea Town Council



- Portishead Town Council
- Wraxall and Failand Parish Council
- Wrington Parish Council
- Wick St Lawrence Parish Council
- Yatton Parish Council

Omission Sites

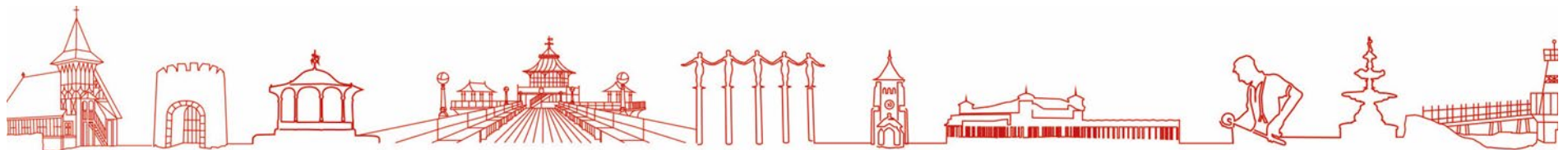
3.3 There were 67 sites submitted to the consultation for consideration as potential allocations for various uses, but predominantly housing. The majority of these were either resubmissions of sites we were already aware, and which have been assessed through the Strategic Housing Land Availability Assessment (SHLAA) or adjustments to an existing site. There were also three completely new sites that hadn't been submitted in any previous consultations or through a 'call for sites' process.



4. Summary of Responses

4.1 The following tables are a summary of the main issues raised during the consultation. For some policies there were either no issues or objections raised or no responses and therefore they don't feature in the summary tables below. These policies are:

- SP12: Minerals – 4 comments received all supporting the policy approach.
- LP5: Town centre hierarchy – 2 comments received both supporting the policy approach.
- LP18: Coastal Change Management Areas - 1 comment received from the Environment Agency supporting the policy approach.
- DP13: Environmental pollution, living conditions, health and safety – 1 comment received from the Environment Agency supporting the policy approach.
- DP25: District Centres – No comments received.
- DP27: Primary shopping areas – No comments received.
- DP28: Retail parks – No comments received.
- DP29: Sequential approach for town centre uses – No comments received.
- DP33: Waste disposal – 1 comment from the Environment Agency supporting the policy approach.
- DP42: Historic Parks and Gardens – No comments received.
- DP48: Residential annexes – 1 comment received supporting the policy approach.



Strategic Policies

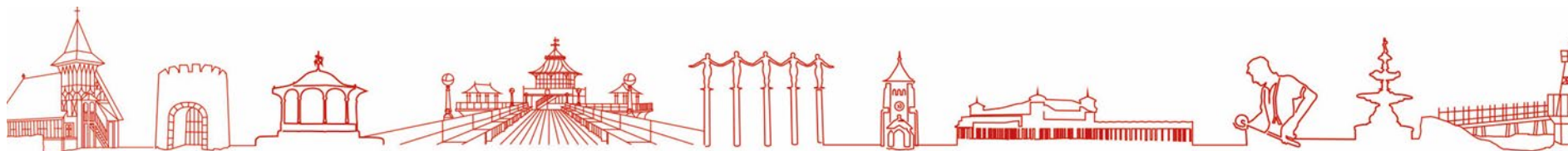
SP1: Sustainable development

Level of response to this policy:

Number of representations received: 85
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 7 No: 70 Unsure: 2 No answer: 6
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 9 No: 19 Unsure: 40 No answer: 17
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 5 No: 29 Unsure: 34 No answer: 17

Main issues raised:

- The list of criteria is relatively generic and reflects general national policy requirements. It is not clear how development can demonstrate compliance. For example, not all developments will be able to support a variety of housing where no housing is proposed. There are areas of inconsistency with the NPPF e.g. protecting valued assets whereas this should be a balance. Policy needs to be clear and focused to add value to the local definition of sustainable development. Plans should avoid unnecessary duplication and this policy is not needed as the principles are set out in national guidance. For clarity the policy should make specific reference to the NPPF. The presumption in favour of sustainable development should be moved from the justification into the policy to reflect government policy.
- Amend opening sentence so that the plan should aim 'where possible'. There are ambiguities in the policy and not sufficient differentiation from national policy. Avoiding adverse environmental impacts is unrealistic – there is a need for balance. Amend to 'avoid, limit or mitigate'. Plan does not contain flexibility in order to respond to change. Reference to the delivery of supporting



infrastructure doesn't consider the role of improving existing infrastructure. Significant overlap between the strategic criteria and objectives linked to SP1.

- Delivering net zero should not be a mandatory target. Policies for construction standards should not go beyond building regulations.
- Much of what the policy is trying to achieve is better covered in detailed DM policies. Policy should be deleted and converted into supporting text and which is consistent with NPPF.
- Need to preserve agricultural land for food production. Green fields are prioritised ahead of urban sites. Development proposals damage green infrastructure and biodiversity.
- Disproportionate growth at villages such as Backwell is not sustainable. New development without adequate facilities or infrastructure will result in increased car use. On the other hand, plan is focused on the towns and fails to recognise that villages are sustainable locations for growth.
- The proposals in the plan do not comply with the definition it has set itself such as not meeting housing need and failing to deliver sustainable development. Transitional arrangements mean plan is assessed against the old NPPF which requires a higher housing target.
- Policy should deal with issues of land stability in respect of previous coal mining.

Support/other comments:

- Support the view that Green Belt protection is not a sustainability objective.

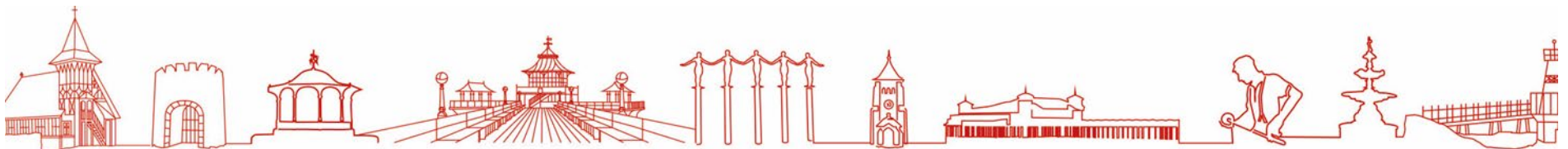
SP2: Climate Change

Level of response to this policy:

Number of representations received: **50**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **8** No: **35** Unsure: **1** No answer: **6**



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **10** No: **12** Unsure: **11** No answer: **17**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

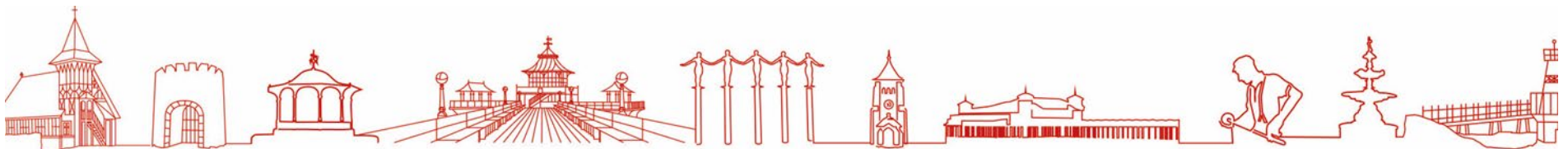
Yes: **5** No: **20** Unsure: **8** No answer: **17**

Main issues raised:

- The policy requirements are better applied as supporting text, rather than detailed policy. Inappropriate to require every development to meet every criterion. Include the wording 'where relevant' in the policy requirement.
- Should not apply local energy efficiency standards. No evidence to demonstrate exceptional circumstances to go beyond national standards. Question validity of evidence base. Requirements will have detrimental impact on housing delivery with significant consequences for the deliverability of sites.
- Distribution of development will not reduce greenhouse gasses nor assist in delivering carbon neutrality.
- Attach suitable timeframes to criteria, should be phased over a suitable timeframe.
- Policy should say 'reduce' water use rather than 'maximise' water re-use.
- Change wording to 'encourage net zero' and 'deliver net zero ready buildings'. 'Incorporate' rather than 'maximise' renewable and low carbon energy.
- Amend to read 'deliver high quality green infrastructure' ... contributing to Nature Recovery Network and provide a minimum 10% net gain in biodiversity... Add reference to blue infrastructure. Add requirements relating to locating development in proximity to public transport hubs and adopting principles of the circular economy.

Support/other comments:

- There is good support for a strategic policy on climate change and that this approach is compatible with a council which has declared a climate emergency. Some developers saying that they are committed to contributing to solutions. Great that the environment is being valued for future generations.



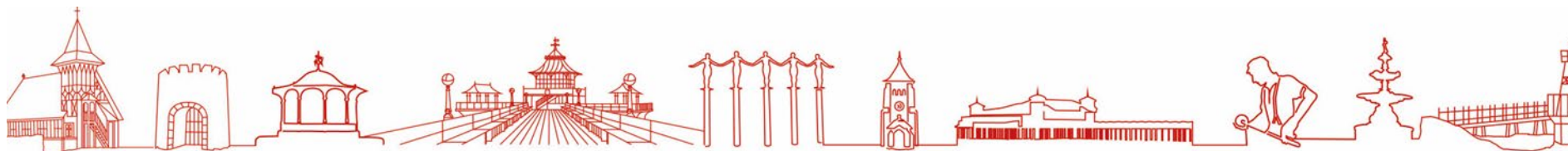
SP3: Spatial Strategy

Level of response to this policy:

Number of representations received: 101
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 6 No: 89 Unsure: 1 No answer: 5
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 11 No: 27 Unsure: 47 No answer: 16
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: No: Unsure: No answer:

Main issues raised:

- Wording is not a policy but a statement of intent – it should be moved into the supporting text. Reads like a vision. Approach could be applied to any area not just North Somerset.
- Need to set out a hierarchy of urban areas, towns and villages. Required to shape how housing growth is to be distributed. Need to refer to a specific housing requirement in the policy. It does not make it clear that development will be concentrated at the four main towns. No recognition of the impact of Bristol, commuting patterns and Bristol's unmet needs. Need to allocate Green Belt in sustainable locations. Protect villages by directing growth to the edge of Bristol as planned urban extensions.
- A one size fits all approach is wrong. The two tier settlement strategy of towns and villages does not recognise the nature and function of settlements. Places like Yatton, Backwell and Congresbury are sustainable locations. Not all villages are the same. Need for a service village category between the two to allow development in sustainable villages beyond the settlement boundary. Allocate more greenfield sites in Category A villages. Fails to provide a sufficient quantum of development to meet affordable housing need.
- Spatial strategy fails to respond to the findings of the SA which recommends an urban focus and would maximise the benefits of new infrastructure, minimise flood risk, loss of high value agricultural land and impacts on sensitive habitats. Growth at villages should be limited to local community needs.



- Need to define 'local community needs', what is a 'proportionate scale' of growth and 'accessible locations'. Villages in accessible locations with good transport opportunities should not be limited to meeting local needs only. Backwell growth is of a disproportionate scale – 35% increase will turn it into a town.
- Scale of growth at Backwell is inappropriate for a village, adverse impact on local highways, impact on local services, lack of infrastructure and does not relate to local community needs. Scale of growth at Churchill/Langford in recent years has been inappropriate and resulting from a lack of a 5 year supply. Future policies must be more robust. Scale of development is not reflecting local needs in villages and rural areas.
- A disproportionate level of growth is directed to Weston/Wolvershill with insufficient growth to other sustainable towns and villages. Without this unaffordability in other areas will be exacerbated. A spatial strategy so reliant upon a small number of sites is vulnerable to failure.
- It is not clear which of the four spatial strategy options of retain Green Belt, urban focus, transport corridors or greater dispersal is being pursued. Plan is mainly existing supply and based on historic patterns of development.
- No reference to Green Belt, AONB or strategic gaps.
- All non-Green Belt options including land close to urban areas within FZ3 have not been properly considered before Green Belt. Sequential approach to flood risk – if it can be mitigated effectively and made safe during its lifetime then development can be accommodated.
- Relegating sustainable locations within the Green Belt as a last resort is contrary to national policy. Accessibility to the Bristol urban areas and employment opportunities should be a key consideration.

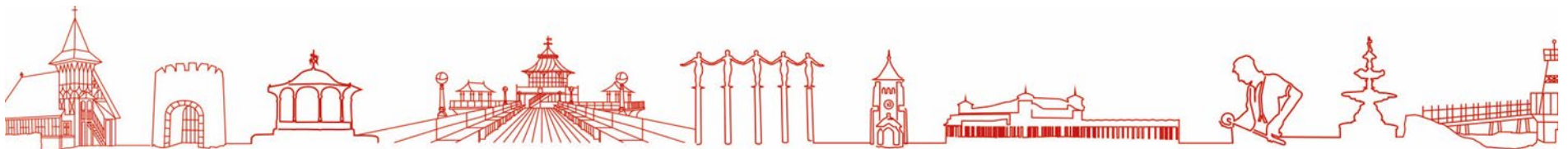
SP4: Place-making

Level of response to this policy:

Number of representations received: **38**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **7** No: **26** Unsure: **0** No answer: **5**



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **8** No: **2** Unsure: **18** No answer: **10**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **6** No: **4** Unsure: **18** No answer: **10**

Main issues raised:

- Policy is unnecessary and goes into detailed matters which aren't suitable for a strategic policy and duplicates other policies. Should be converted to supporting text. Not every development should meet every criterion.
- Policy doesn't allow for developments to be in delivered at a time when the correct infrastructure to be in place to support them, meaning residents need to travel elsewhere which increases the carbon footprint. Not effective as it doesn't ensure that all developments are designed to minimise car use or phased in time with development.
- Ambiguous policy which is not clear what is meant by 'high quality' and how to address climate and nature emergencies, what the implications of a design review would be and how proposals maximise opportunities for healthy lifestyles.
- Policy should include allowing people to connect to nature. Fails to apply the new approach to biodiversity net gain.
- More information needed about the stage and make up of the design panel and its purpose. This introduces uncertainty.
- Needs additional guidance to demonstrate how the overarching principles in SP4 should be applied.
- Amend 'reflect' local character to 'respond to and compliment'.

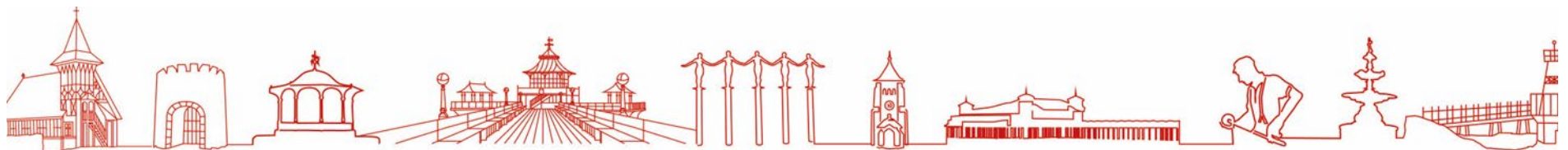
SP5: Towns

Level of response to this policy:

Number of representations received: **24**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **4** No: **18** Unsure: **1** No answer: **1**



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **6** No: **4** Unsure: **7** No answer: **7**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **4** No: **9** Unsure: **5** No answer: **6**

Main issues raised:

- No additional development is appropriate at Nailsea due to lack of infrastructure and facilities and overloaded roads. Alternatively, Nailsea is identified as a town and therefore more development should be targeted there in accordance with the spatial strategy including affordable housing. The current level of growth does not allow for the needs of Nailsea to be met.
- The settlement boundaries of the towns should be extended to allow for more sustainable growth at these locations to reflect the policy.
- The supporting text should acknowledge that the towns comprise the wider urban areas.
- Additional allocations and enabling windfall policies are needed. Policy should allow for development adjacent to the settlement boundaries as well.

SP6: Villages and rural areas

Level of response to this policy:

Number of representations received: **74**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

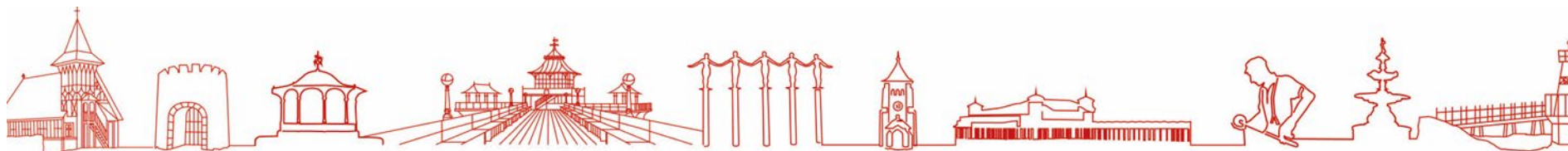
Yes: **4** No: **63** Unsure: **1** No answer: **6**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **11** No: **18** Unsure: **31** No answer: **14**

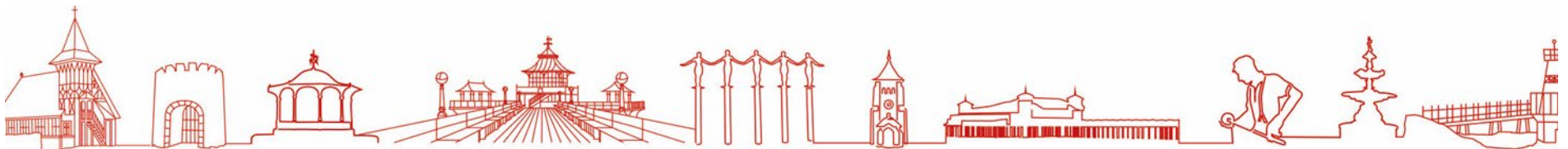
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **7** No: **24** Unsure: **29** No answer: **14**



Main issues raised:

- Concern that the policy is too restrictive as it doesn't allow for residential development to come forward adjacent to settlement boundaries as is currently the case in the adopted plan. It is felt that this doesn't provide the flexibility needed to deliver the appropriate amount of growth over the plan period on a range of sites. It is also felt that this could impact on the sustainability of settlements as it won't allow them to thrive and grow to meet local needs. Inconsistent with NPPF which states that 'planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services'.
- It is unclear as to why non-residential proposals are acceptable outside settlement boundaries and further justification for this stance is required.
- An exception to housing outside of the settlement policy boundary should be if it is allocated in a neighbourhood plan. This would allow for smaller areas to allocate sites through neighbourhood planning if desired.
- The two-tier settlement strategy set out in the spatial strategy does not reflect the nature of the settlements of North Somerset with all settlements apart from Weston Super Mare, Nailsea, Clevedon and Portishead considered villages. The settlement hierarchy should include a service village category to include the more sustainable settlements where growth should be accommodated.
- Comments refer to how sustainable or otherwise various villages are. Suggestion that settlements should be assessed as groups or clusters of settlements meaning that such areas might be able to sustainably support a higher level of development but may not have all the services within one particular village. Confusion over categorising the sustainability of settlements for plan-making purposes and allocating sites and the proposed policy approach.
- Remove any reference whereby an alternate new build development following a previous approval for a conversion will not be permitted. How does this policy help retain farm buildings.
- To be effective the policy should also include a list of villages, in the same way the four towns are listed in Policy SC4. Plan users should not have to consult the policy map to see which locations are villages.
- Important that the green spaces within settlement boundaries aren't at risk of development. Suggestion that new developments within settlement boundaries include a certain minimum amount – perhaps 25% of the total development area - of open and contiguous green space.
- Objection to the proposed housing allocations at Backwell, in particular Grove Farm. Objections relate to:
 - the impact of additional homes on the road network.
 - loss of high-quality agricultural land and countryside.
 - impact of an increased population on the services and facilities in the village.



- loss of wildlife and public open space.
- objection to the proposed Bus Service Improvement Plan (BSIP) on Dark Lane.
- Backwell is not a sustainable location as there is no employment.
- the proposed allocations will disproportionately increase the size of the village.
- the proposed allocations are contrary to the Backwell NDP.
- housing should be built at Ashton Vale near Bristol rather than at Backwell.
- the Grove Farm allocation is outside the current settlement boundary.
- Backwell is a village and therefore allocations should only relate to local community needs as set out in SP3.

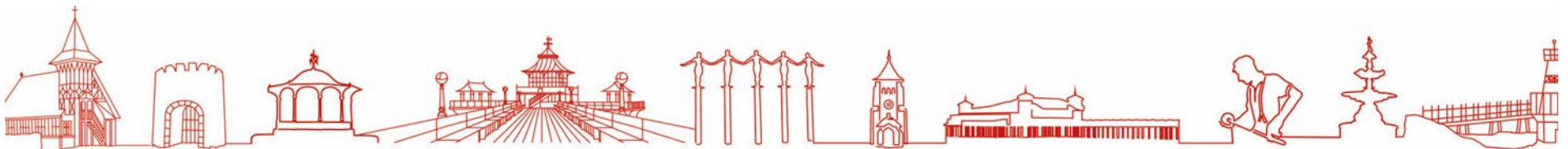
Support/other comments:

- General support that the policy limits new development to land within the settlement boundary, subject to compliance with all policy criteria. The limitations imposed on development outside the settlement boundary are also supported to control settlements from further outward expansion.
- The Environment Agency support this policy but would recommend that infrastructure requirements should include foul drainage infrastructure. This is because in rural areas there may be less opportunity to connect to a mains foul system. Foul drainage hierarchy is important, and connection to a mains foul sewer should be the preferred option, if possible.

SP7: Green Belt

Level of response to this policy:

Number of representations received: 81
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 14 No: 44 Unsure: 12 No answer: 11
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 16 No: 18 Unsure: 24 No answer: 23

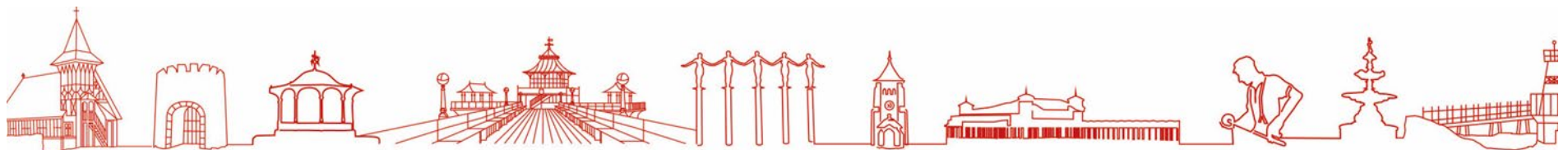


Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **11** No: **23** Unsure: **22** No answer: **25**

Main Issues Raised:

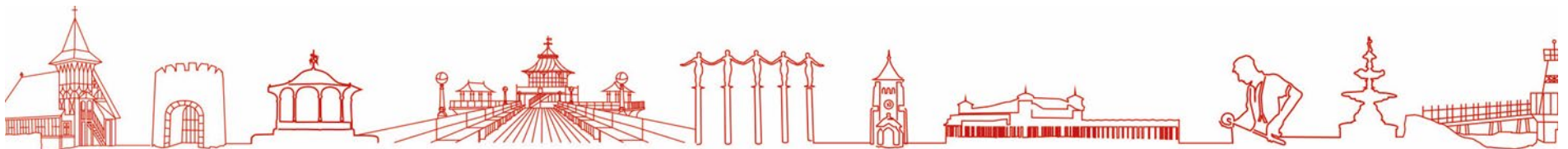
- There has been no proper consultation with various local councils on the changes to the Green Belt and settlement boundaries.
- None of the Green Belt should be built on. North Somerset seems determined on over development in this new local plan including the desecration of the Green Belt.
- The Council should consider the benefits of channelling sustainable development towards urban areas inside the Green Belt boundary and towards towns and villages inset within the Green Belt.
- Retain land at Colliers Way on the edge of Bristol as Green Belt.
- Retain all land around the airport as Green Belt and subject to current designations.
- Bristol Airport requests that the Green Belt inset is extended to include the extension to Silver Zone car park as permitted under the 12 mppa planning permission and land north of the runway to accommodate longer-term development to circa 15mppa, in line with proposals for development beyond 2030.
- In light of the housing requirement of North Somerset needing to be higher, a full Green Belt review is required along with the further Green Belt releases. The exceptional circumstances of the housing crisis and the need to fully meet the housing needs of the area justify additional Green Belt releases and further housing allocations. The policy should be amended to include additional sites for housing. This would help address the significant affordable housing problem within North Somerset, and to account for likely unmet need from Bristol. Consider the release of further sites in the Green Belt on the edge of existing settlements to provide new homes in such a way so that their impact on the openness of the Green Belt is minimal.
- Land north-west of Easton-in-Gordano should be released from the Green Belt. The site is located at the outer edge of the Green Belt and contributes very little to the openness of the countryside or other purposes of the designation. The site is also in a highly sustainable location, being within close proximity to existing and proposed public transport facilities.
- Nailsea has a large range of services and facilities, and priority will be given to development in or close to such urban areas. There is a lack of new allocations at Nailsea in the Reg 19 plan. Clearly the spatial strategy and allocations are misaligned and need for a proper consideration of boundaries through a master planning exercise.



- Nailsea needs a new road from Coates and Southfield Road Industrial Estates to Wraxall Road to allow for the traffic from new residential development and to release industrial and employment opportunities for Nailsea. Land should be released from the Green Belt to allow for this.
- Release land from the Green Belt at Dark Lane, Backwell for residential and primary school facilities. It is in close walking distance of the primary school and the village centre/train station/secondary school.
- Release land at Tower Farm from the Green Belt for residential development.
- The proposed new Green Belt at Nailsea/Backwell is contrary to NPPF and does not fulfil any of the five purposes of a green belt designation. If it is introduced, then the eastern boundary north of Moor Lane should follow existing physical features, namely the alignment of the existing watercourse and residential garden boundaries.
- The proposed Green Belt should be extended further to include land west of Chelvey Lane, south of Netherton Wood Lane, as far as the parish boundary at the River Kenn. Also the land north of Youngwood Lane is highly prized by the people of Nailsea for recreational use and should be added to the Green Belt.
- Ensure that housing development plans are consistent with the strengthening of the Green Belt between Backwell and Nailsea. The Grove Farm development is completely at odds with this principle and so should be removed from the plan.
- There are two important missed opportunities for more new Green Belt in the south of the district. They are a block of completely new Green Belt in the south east stretching inland of the M5, from the southern edge of the existing Green Belt down to the northern boundary of the Mendip Hills AONB and a new commitment by North Somerset Council that every acre or hectare of Green Belt which is removed in the new plan will be replaced by at least 3 new ones elsewhere in the District ('3 in, 1 out').
- It would seem prudent to consider extending the Green Belt to the area south of Tickenham, west of Nailsea and east of Clevedon. This moor area is not suitable for any purpose other than agriculture. Converting this area to Green Belt would deter unwanted attention from developers and land investors and would consequently reduce NSC and local residents' workloads in responding to these.

Support/Other Comments:

- Support for the extension of the Green Belt to the south of Nailsea, as defined on the Policies Map to prevent the merger of Nailsea and Backwell and further encroachment into the countryside.
- Maintaining existing Green Belt in the general locale of Nailsea and Wraxall, of Backwell Common and the entire valley from through to Flax Bourton is supported. This is a beautiful place with access to the river and many footpaths, with mature trees and copses and the Belmont Estate re-wilding initiative at Watercross Farm.



- It is considered that there are exceptional circumstances to amend the Green Belt boundaries to enable development at the land identified in draft Policy SP7.

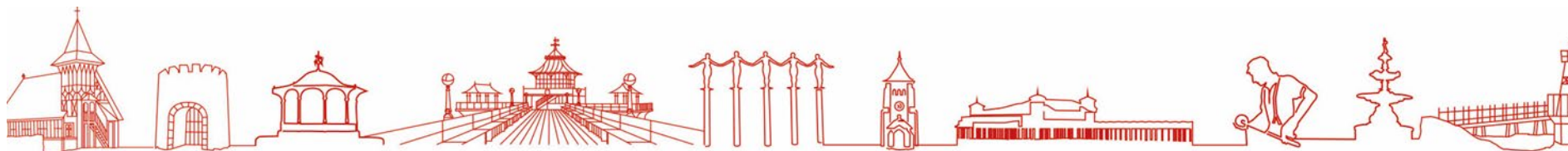
SP8: Housing

Level of response to this policy:

Number of representations received: 96
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 4 No: 80 Unsure: 3 No answer: 9
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 19 No: 34 Unsure: 20 No answer: 23
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 11 No: 47 Unsure: 16 No answer: 22

Main issues raised:

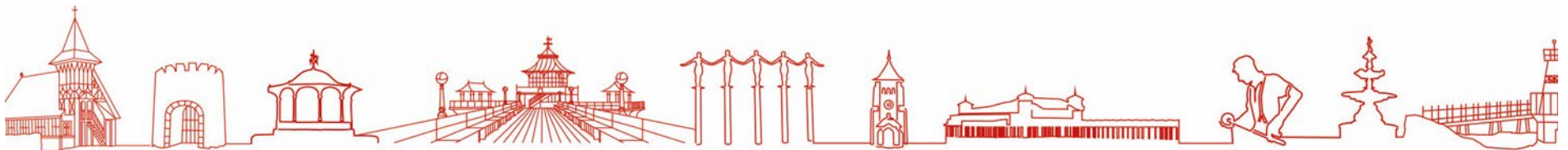
- The plan period should be extended as it will not provide for 15 years post adoption and consequently this would require the housing requirement to be increased.
- The proposed housing requirement should be based upon the government's standard methodology as there are no exceptional circumstances to justify a departure from national policy.
- There is unmet need arising from Bristol and this has not been adequately addressed.
- No consideration has been given to increasing the housing requirement to meet affordable housing needs or an allowance to support the economy.
- The sustainability appraisal has not considered all proposals or reasonable alternatives.



- No trajectory has been published alongside the consultation, nor has any evidence to demonstrate that a five year supply will be achieved at the point of adoption. The assumed rates of delivery on strategic sites are unrealistic.
- Concern regarding reliance on a windfall element in the supply figures and that the windfall allowance includes double counting or inflated completion figures.
- The annualised housing requirement should be included within the policy text not the supporting text, as it is important to have an agreed annual figure for monitoring purposes.
- There is a current shortfall in housing delivery from the Core Strategy period and this should be accounted for.
- Too much growth is directed towards Weston-super-Mare, Wolvershill and the south of the district. The housing distribution should be diversified and additional residential sites should be identified at Clevedon, Nailsea, Portishead and closer to Bristol.
- The broad distribution of growth by area will not deliver the spatial strategy priority to focus development in or close to urban areas. If Wolvershill is categorised as village growth over 40% of the dwelling capacity is directed to villages.
- Concerns regarding the amount of development proposed at villages. Specific references are made to Backwell, Churchill, Wraxall, Failand, Yatton, Pill and Easton-in-Gordano.

Support/Other Comments:

- Support for specific elements such as the level of housing provision proposed at Portishead or Nailsea and the removal of Nailsea/Backwell as a strategic location for growth.
- Support for the locally derived housing requirement.
- Promotion of numerous additional sites.
- The transitional arrangements in the NPPF require draft plans that reached Regulation 19 stage on or before 19 March 2024 to be examined under the previous version of the framework.
- The justification text following the policy wording sets out the split between windfalls and allocations by area but it would be helpful to have this as a table rather than in words.
- Focus should be on re-use of brownfield sites rather than green fields.



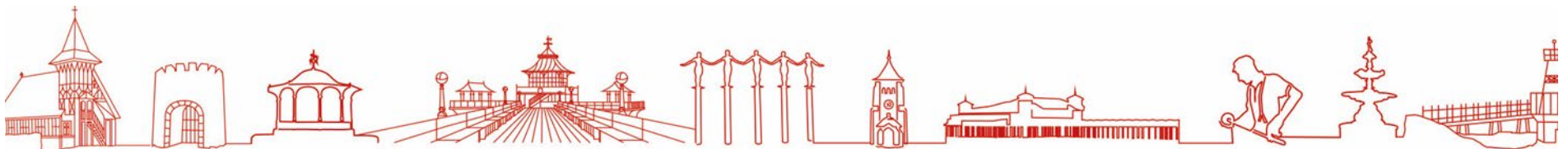
SP9: Employment

Level of response to this policy:

Number of representations received: 33
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 6 No: 20 Unsure: 2 No answer: 5
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 6 No: 2 Unsure: 13 No answer: 12
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 5 No: 1 Unsure: 14 No answer: 13

Main issues raised:

- There is a need to improve employment sites in Weston-super-Mare to make it a sustainable location for housing and development. There needs to be more industrial land allocated at the towns to reduce commuting to Bristol city centre and the north fringe employment sites and to ensure that sustainable work patterns can be engendered. Employment models by the later plan period may have significantly changed and any development should look to be a model for sustainable and zero carbon workplaces.
- Whether or not the plan should retain the current employment-led approach and the requirement for 1.5 jobs per home within Weston-super-Mare.
- Concern that the Plan does not allow for new employment in Nailsea, which will impact on the levels of out-commuting, especially as Nailsea already has one of the highest rates in North Somerset. Brownfield sites should be safeguarded for such uses.
- Objection to proposed business site east of J20, Clevedon for reasons including impact on existing uses, low quality jobs that would be provided, poor transport infrastructure, previous rejection of proposals in this area, potential for adverse impact on biodiversity, and flood risk.
- National Highways recommends that there is a dedicated policy to cover the proposed business site to the east of J20 Clevedon and which will help to clearly articulate, in one place, the criteria which must be satisfied to enable the development at this location, including evidence of the deliverability of the required transport infrastructure to support this site.



- Issues arising from HGV movements associated with large business located at the villages, such as Yatton. Could be addressed by use of weight limits.
- Need to take account of food production when considering land for employment purposes. Also need to consider employment from farming and food production.

Support/other comments:

- Support for employment sites being located close to the main towns in line with the spatial strategy. More generally support for employment close to new housing.

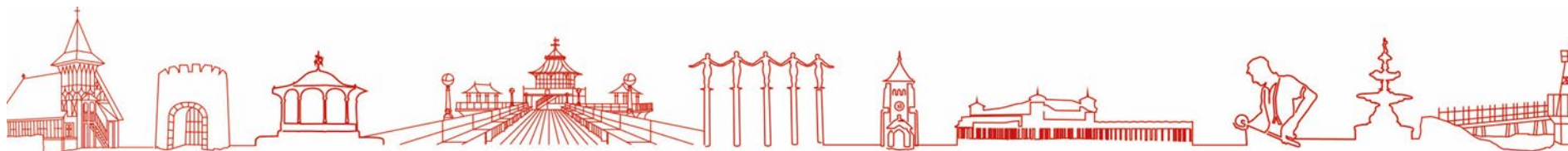
SP10: Transport

Level of response to this policy:

Number of representations received: 64
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 6 No: 51 Unsure: 2 No answer: 5
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 10 No: 4 Unsure: 42 No answer: 8
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 7 No: 9 Unsure: 41 No answer: 7

Main issues raised:

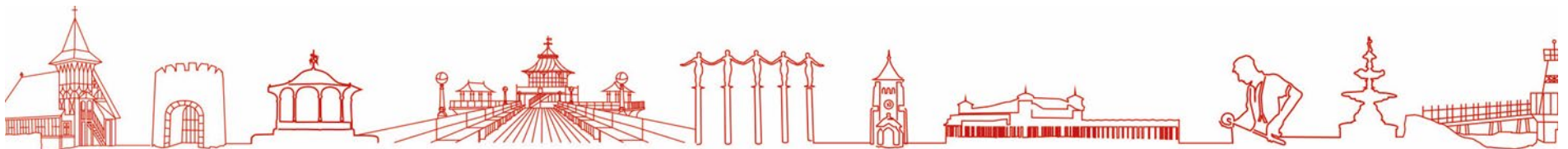
- Concern over the ability of the transport network around Backwell, Nailsea and Flax Bourton to accommodate additional demand from proposed residential allocations in the plan (Grove Farm and existing permission for Farleigh Fields), including impacts on the A370



Backwell Crossroads, Brockley and nearby rural lanes network and train capacity at Nailsea & Backwell Railway Station. Lack of infrastructure improvements identified to mitigate the impacts.

- Concern over the capacity at Backwell Station and associated carpark. Services have reduced in frequency and features regular cancellations. Lack of infrastructure improvements identified to mitigate the impacts. There is no disability or pushchair access at the train station. A section on railways should be included within SP10 due to the effectiveness of moving high volumes of people.
- Concern over the implications of the Bus Service Improvement Plan. Proposals to shut the Dark Lane arm of the A370 Backwell Crossroads to through traffic, citing potentially unsafe alternative accesses onto the A370 at Church Lane and impact of re-routed HGVs on local roads.
- Concerns raised over the speed and volume of traffic through and around Tickenham and the inappropriate routing on its nearby rural lanes, causing conflict with active travel and creates safety/danger concerns. Need to identify improved infrastructure for the area.
- An opportunity has been missed not to explicitly mention 'green lanes' or to promote reductions in speed limit to 20mph in rural country lanes.
- Concerns over the ability of the transport network around Yatton and Claverham when the M5 builds up. A bypass should be considered. It was also noted that there are poor access links between Yatton and Clevedon.
- The policy assumes that the most individuals should use cycling/public transport as their primary mode, which is not realistic in a rural location. There is a lack of recognition of the difference between urban and rural areas within the policy. This is discriminatory and increases rural isolation, poverty and increased rural health impacts.
- It is not a policy, but a list of criteria which needs to be looked at or addressed.
- Policy needs to address the parking and infrastructure improvements for getting to and from Bristol Airport for both staff and public.
- The policy should include provision to ensure new developments create conditions for safe movement using the highway network to key destinations. This should also include safe active travel routes within the development.
- Inappropriate to focus to electric vehicles as the market may not develop as quickly as anticipated.
- Potential to further develop railway freight interchange facilities relating to Royal Portbury Dock.
- The policy refers to the growing health emergency although the Council does not provide any specific details of how these issues have been considered through the evidence base.

Support/other comments:



- Support given to prioritisation of active travel and public transport within development proposals and transport schemes to promote health, well-being, and reduction of environmental impacts from transport.
- Support for the approach to embed sustainable travel opportunities within the spatial strategy and the reduction of environmental impacts from transport.

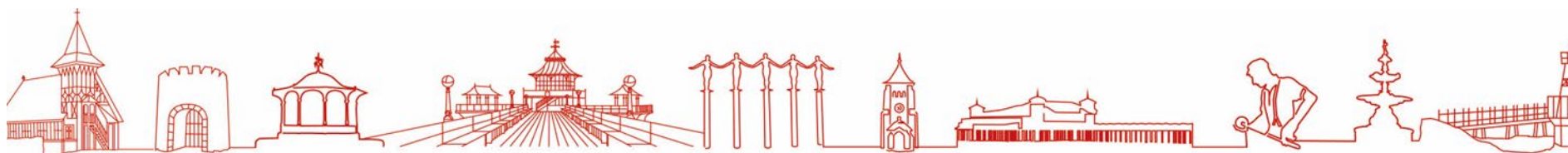
SP11: Historic and natural environment

Level of response to this policy:

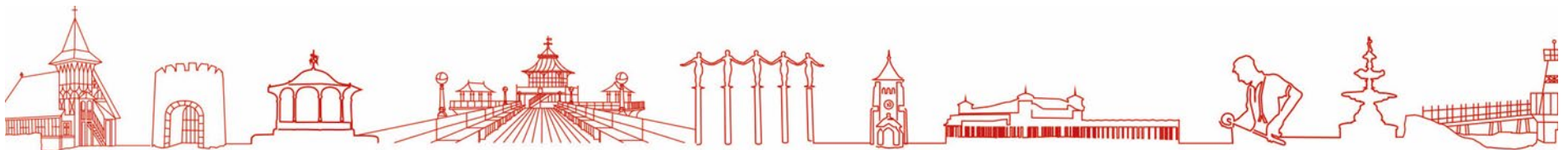
Number of representations received: 25
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 4 No: 17 Unsure: 0 No answer: 4
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 6 No: 2 Unsure: 5 No answer: 12
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 4 No: 5 Unsure: 4 No answer: 12

Main issues raised:

- The draft policy sets out different tests to the NPPF. The policy wording should be revised to be consistent with government policy. Alternatively, the policy should be deleted and instead rely upon the development management policies. This would remove duplication and be consistent with the Framework.
- Requiring development to 'preserve and enhance' heritage assets is different to the NPPF approach of assessing the level of harm to the significance of the heritage asset, followed by an evaluation of whether the level of harm is outweighed by the public benefits arising from the development. The policy should refer to 'heritage assets' with reference to desirability of new development making a positive contribution to character and distinctiveness against the great weight that should be set against the asset's conservation.



- For the AONB, the policy applies a test which excludes other considerations rather than a factor which should be considered in the planning balance, albeit with great weight. In respect of conserving the natural environment, the policy should recognise, specifically in AONB, that through assessment any detrimental effect can be moderated.
- The policy goes beyond national policy in applying a blanket requirement to protect the best and most versatile agricultural land, rather than requiring its economic and other benefits to be recognised. In respect of green infrastructure, those issues relating to best and most versatile land and future development should be considered in the context of, and balanced against, other considerations where its release is required to meet other needs. The NPPF recognises that 'where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality'. The policy should be amended to reflect this approach; in some locations use of BMV land may be the only option to meet housing needs.
- There is a focus on BMV land but all agricultural land is important especially with a growing population.
- As some of the terminology proposed is vague, it may be challenging/difficult for planning applications to demonstrate how they adhere to the various requirements. Support for the caveat that confirms the bullet point examples apply only 'where appropriate', albeit some of the detail may be best refined and streamlined to be less generic. Some of the lengthy wording may be better captured as accompanying paragraphs to support the policy itself.
- The policy places undue planning controls on new development proposals without offering any compromise or reference to mitigation measures which could yield benefits and positive improvement. It also refers to environmental designations alongside the provision of green infrastructure which is confusing and should be simplified. Green infrastructure and historic environment policy should be separated out and simplified. It is unclear as to why both planning considerations have been
- combined.
- The policy should refer to the West of England Local Nature Recovery Strategy and link to this to achieve environmental outcomes.
- The policy requires that the green and blue infrastructure network of the area be maintained and enhanced as set out in the Green Infrastructure Strategy, but this does not define these corridors accurately enough nor make clear what is expected in terms of development complying with its requirements.
- The Nature Parks referenced would not mitigate the negative impact on wildlife, biodiversity, the loss of the best and most versatile land and particularly the internationally important Greater and Lesser Horseshoe Bats in the area.
- As there is a duty to conserve and enhance natural beauty of the National Landscape, development should always 'avoid adverse impacts' on the setting of the Mendip Hills National Landscape (AONB), and not be allowed if it only 'minimises'.



- Add other key species such as hazel dormouse, European eel, oil beetles, small pearl-bordered fritillary butterfly, common adder. These are key indicators of healthy habitats. Reference to the North Somerset & Mendip Bats Special Area of Conservation (SAC) would be useful in this section.
- Policy is missing reference to the restoration and protection of the moorlands and the North Somerset Levels.
- Need greater emphasis to enhance the natural environment in urban areas where there are opportunities for informal nature sites in parks and gardens.
- The simple reference to securing biodiversity net gain fails to reflect the new approach. The policy should instead make specific reference to the 10% mandatory biodiversity net gain, needed to be consistent with national policy.

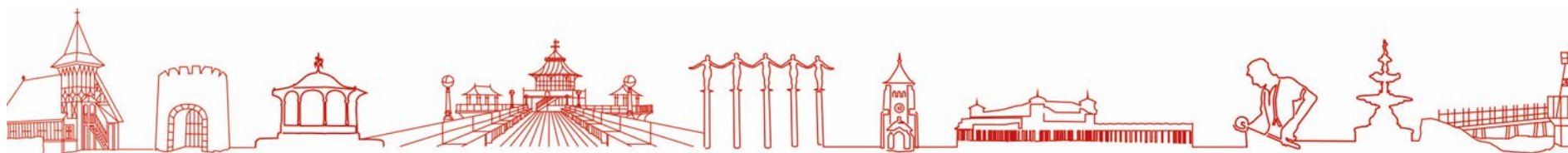
Support/other comments:

- The emphasis on restoring habitat and biodiversity in this section is extremely welcome and necessary. Support the ambitions of protecting and enhancing valued landscapes and historic environments.
- In line with the Government's national name change of the Areas of Outstanding Natural Beauty (AONBs) in November 2023, throughout the Plan 'Mendip Hills National Landscape (designated an Area of Outstanding Natural Beauty)' or MHNL, should be used.

SP13: Waste

Level of response to this policy:

Number of representations received: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 1 No: 1 Unsure: 0 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 0 Unsure: 1 No answer: 1

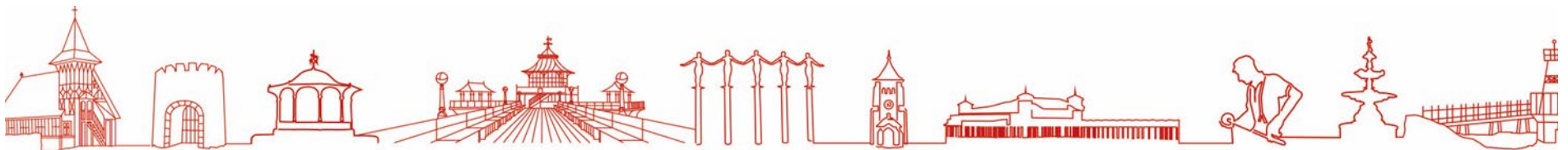


Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **1** No: **0** Unsure: **1** No answer: **0**

Main issues raised:

- Plans to increase the percentage of recycling serves only to promote fly tipping.
- The policy should include more encouragement for repairing and upcycling.



Locational Policies

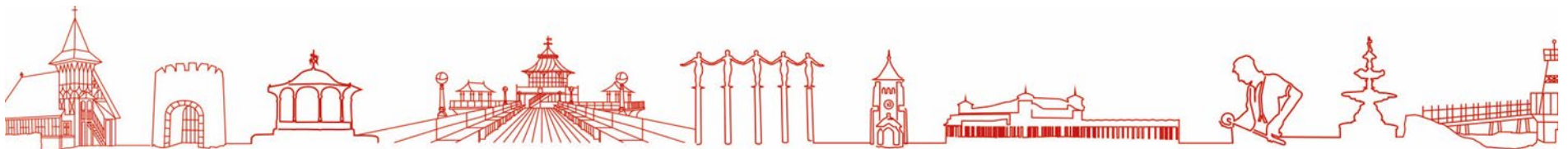
LP1: Wolverhill Strategic Development Location

Level of response to this policy:

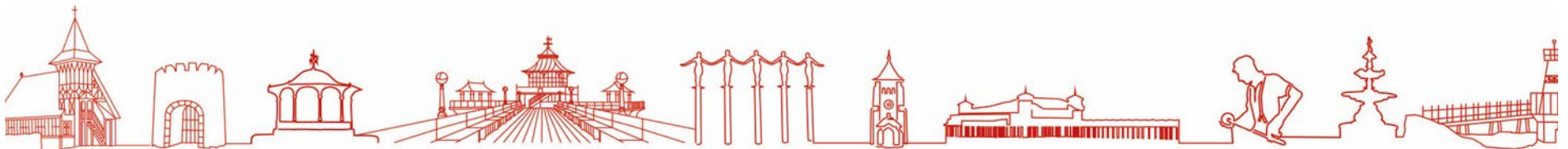
Number of representations received: 33
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 2 No: 22 Unsure: 1 No answer: 8
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 5 No: 8 Unsure: 6 No answer: 14
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 3 No: 12 Unsure: 4 No answer: 14

Main issues raised:

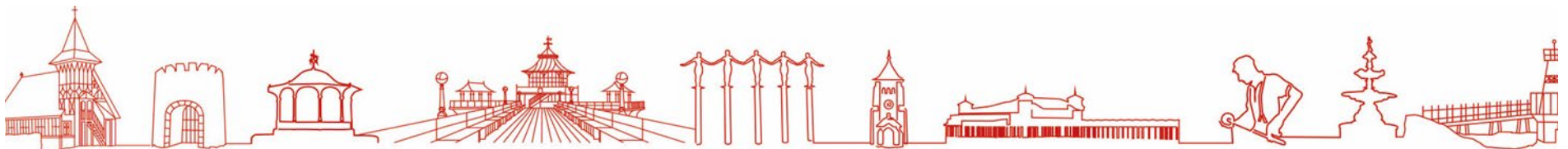
- The policy and supporting text should set out broad masterplanning framework principles covering Green Infrastructure, strategic transport, design principles and the distribution of land uses, but leaving freedom for individual proposals to set out detailed masterplanning for specific parcels of the strategic location.
- The policy and supporting text should set out guidance on expectations of how individual land parcels coming forward at different times will be co-ordinated to ensure a smooth delivery process.
- The policy and supporting text should set out clearly where specific land uses are intended to be located and different densities and forms of residential development will be appropriate.
- The SPD should provide detail of phasing, particularly in relation to the delivery of strategic and local transport infrastructure, delivery of the Banwell Bypass, and whether there may be some elements of the allocated site which could be phased to come forwards in the early stages of delivery.



- The policy and supporting text should set out arrangements and principles for land equalisation across the site as it comes forwards, based on the land distribution principles that should also be set out in the SPD.
- It would also be helpful if LP1 could make clear where some elements of the proposals may be delivered in areas outside of the identified strategic location.
- Housing provision for the site should not be limited to 'up to around 2800' and instead should allow for 'around' or a 'minimum of 2,800 dwellings.
- Realistic assumptions need to be made about delivery from the site over the plan period. The site is not yet even subject to a planning application, and the Start to Finish report of Lichfields suggests that on average it would take 7 years from the submission of such an application until the first completion with an average delivery rate of 120 homes per annum thereafter, which would mean that even if a planning application was submitted imminently this site would be expected to contribute of the order of 960 homes by 2039, some 1,840 fewer than proposed in the emerging Local Plan. The trajectory should reflect the above or strong evidence be provided to demonstrate that there is a reasonable prospect of the site being built out within the plan period.
- Concerns about locating a significant amount of the proposed new housing growth (18%) at one location as developments of the size of Wolverhill are associated with extended delivery and lead-in times. The strategic nature of these sites is complex, meaning that there is a plethora of matters related to planning, highways, and landownership have to be addressed before development can commence. Accordingly, the time it takes to bring forward new housing is significant. This is particularly the case in this instance given that the site will need to be phased in accordance with the Banwell Bypass. The plan should be supported by additional, smaller sites.
- Condense the policy aspects related to transport and movement in fewer points as there are various references.
- It would be helpful if the policy could contain a reference to the need to ensure safe and convenient access to Weston-super-Mare, nearby railway stations and the M5 motorway using low carbon modes of transport primarily but recognising that convenient access to the highway network will also be required. We would suggest that these points could be addressed by changes to the policy, for example by referring to connectivity with the M5 motorway.
- It is not clear why the element of the policy relating to access arrangements having a severe impact is required, given that assessment of new access and transport proposals will be an integral part of designing and planning development as part of the strategic location, and as this is covered adequately by other plan policies. This requirement/issue could be removed from the policy text and covered in supporting text only, or as part of the future SPD which will consider masterplanning and delivery issues (including access and the avoidance of severe highway (and other) impacts in more detail. If there is a specific impact that is anticipated as part of this element of Policy LP1 and this is not covered by other elements of the plan then additional clarity should be inserted for effectiveness.

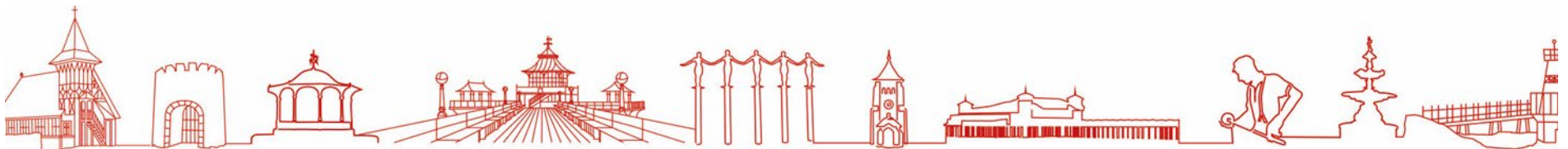


- Will add to pressure on M5 J21.
- Concern over how through traffic is to be dealt with. Policy needs to be more specific in setting out that any down-grading of Wolvershill Road must be balanced by some provision such as a tertiary road to fulfil the lane's existing function as a through route, which if properly designed would minimise additional distance and pollution.
- Evidence is presented that shows that provision should be made for two (420 place) primary schools (rather than the primary schools that are required by the policy), and that a financial contribution would be the appropriate mechanism to ensure that the secondary education needs arising from the new development could be addressed. Updated policy text on this issue is required on this basis.
- Retain flexibility in the policy around education requirements as these will change over time.
- Concern about the establishment of new secondary schools at Yatton and at Wolvershill. On first sight, the proposals may seem sensible as they fit with the council's stated policy of reducing transport costs and siting key services where people live. What has not been sufficiently considered is the viability of schools as both educational and economic units and their impact on other secondary schools' viability.
- The Wolvershill policy proposes a new settlement close to Weston-super-Mare but does not apply the employment-led strategy that was set out for the Weston Villages. A new settlement in this location providing only a minimum of 6.5ha of employment land risks the jobs and homes balance sought to be improved by the existing Weston Villages allocation.
- Land east of Summer Lane (Vistry) is currently identified within the Wolvershill site but should be identified as a separate, standalone allocation.
- Whilst it is agreed that it is appropriate for a Strategic Gap to be identified between Banwell and Wolvershill, there is a need to ensure that there is flexibility to ensure that any potential community, education or active Green Infrastructure uses that are required in this location (in the best interests of the masterplanning and delivery of the wider development) can be achieved. Additional clarifying text on this point should be included as part of the supporting text to Policy LP1 and within Policy LP7.
- The use of wildflower planting is likely to be part of a comprehensive GI strategy across the development, but it is not necessary for this to be specified as drafted in Policy LP1. This text should be removed.
- Not all heritage features (especially those that are not designated heritage assets) could or should be retained and, for example, there may be some archaeology features that may be lost as part of the development, but where this is acceptable due to their level of significance and where suitable mitigation (such as recording) may be secured. The wording should be amended to clarify that not all heritage features will be integrated into the development, but that heritage features will be appropriately integrated, having regard to significance and other policy and placemaking objectives.
- Insufficient consideration of heritage impact.



- There is a need for clarity, either in the policy or as part of future Delivery Plan and SPD about the need for formal pitch provision.
- There is a lack of clarity provided by Policy DP44 (and Policy LP1) in respect of the type and scale of pitch and/or plot provision for gypsy and travellers that is expected to be met overall within the plan period, and specifically the Wolverhill strategic location. The inclusion of a requirement for pitch/plot provision within the Wolverhill strategic location allocation is not based on any specific evidence of availability of suitability and may have implications for both the effective delivery of the wider strategic location development, and for suitable sites that meet the specific needs that arise within the local area.
- Policy requires significant community and infrastructure requirements to support a new settlement in this location, thereby affecting the viability of the site to deliver upon all the policy requirements.
- Proximity to motorway will have a negative impact on the development and occupants.
- Some of the infrastructure listed in the policy have potential implications for the adjacent M5, such as the proposed noise bund, water management, and landscaping. There is also reference to three existing crossings of the M5 (two road bridges and a direct cycle/pedestrian access bridge into Parklands Village). Amend the green infrastructure bullet from 'tree planting along the M5 edge' to 'tree planting adjacent to the National Highways estate (M5).'
- The progressions of further plans in this area cannot know it is achieving sustainable development as large-scale developments are already taking place less than a mile away. Critically the lessons learnt from those in terms of the development mix, sustainable features cannot be known.
- In line with section 85 of the CRoW Act and the recent furthering of the duty of a relevant authority to conserve and enhance natural beauty, development must avoid (not just minimise) impact on the Mendip Hills National Landscape (AONB) and the Bats SAC – where possible it should enhance, including placemaking as a gateway for sustainable recreation and nature connectedness.
- Additional pressure on existing services and facilities in the area.
- While policy states that there should be effective management and treatment of surface water it does not identify that rainwater should be treated as a resource and that proposals should maximise water re-use.
- There will be a requirement to deliver a significant increase in healthcare infrastructure capacity in the town to support the cumulative demand from planned growth. Accordingly the following additional bullet point suggested: 'The development must ensure the provision of appropriate healthcare infrastructure onsite or appropriate financial contributions towards healthcare for new and/or improved facilities off-site to support new development'.

Support/Other comments:



- Support in principle for the Wolverhill allocation and the production of an SPD.
- Agree with the importance of creating a development that places walking, cycling and public transport at the top of the hierarchy for the movement of people around the development and the provision of attractive active and convenient active travel routes and bus services, which will enable access to the services and facilities both within the development and Banwell along with wider connectivity to Worle railway station and Weston-super-Mare. It would assist with clarity and effectiveness if the M5 crossing points anticipated by the policy text are shown on a plan – either as part of the Plan, or future SPD.
- Support the mention of green infrastructure and SuDS schemes.

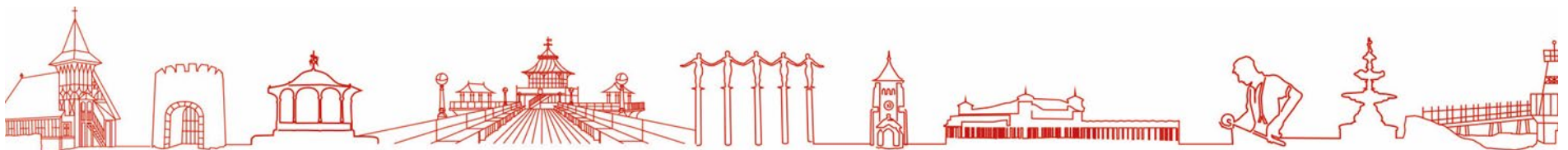
LP2: Housing, employment and mixed use allocations and Schedule 1 and Schedule 2

Level of response to this policy:

Number of representations received: 109			
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?			
Yes: 3	No: 79	Unsure: 3	No answer: 24
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?			
Yes: 16	No: 31	Unsure: 24	No answer: 38
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?			
Yes: 7	No: 41	Unsure: 20	No answer: 41

Main issues raised:

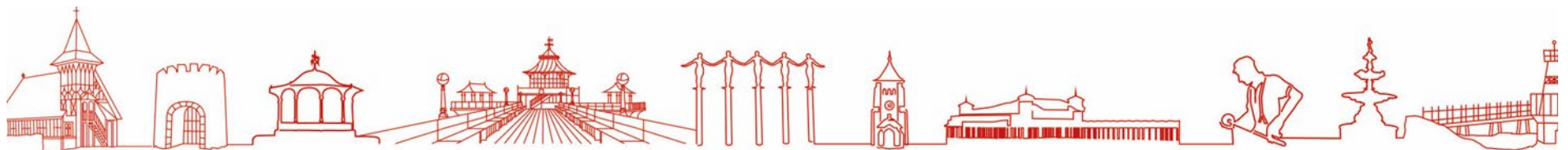
- Objections to proposed allocations.
- Proposed omission sites to include.
- Additional housing allocations are required to meet needs.
- It is not clearly demonstrated how the NPPF requirements in relation to heritage issues have been applied to new allocations.



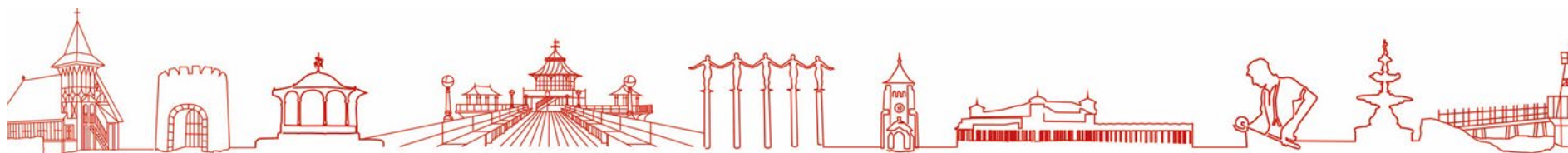
Site specific comments for schedule 1: Proposed residential allocations:

Of the 81 residential allocations were received comments on the following 31 sites. No comments were received in relation to the other 50 proposed residential allocations.

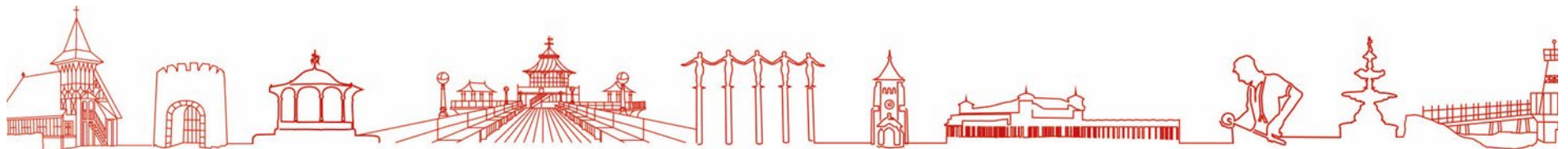
Site	Number of responses	Summary of issues raised
Wolvershill (north of Banwell)	3	<ul style="list-style-type: none"> • 1 comment of support from landowner of part of the site. • 2 comments regarding concerns over provision of infrastructure and delivery.
Elm Grove Nursery, Locking	1	<ul style="list-style-type: none"> • Comment from promoter of the site. Support the principle of allocation but disappointed that capacity has been reduced since previous draft plan.
Parklands Village, Weston-super-Mare	3	<ul style="list-style-type: none"> • Comment that the site specific requirements in schedule 1 should cross refer to the planning permissions that are in place for Parklands Village rather than the Weston Villages SPD as this document is now out of date. • Comment on the boundary of the allocation - the land by Lower Parade Ground and also north of Leedham Road at Locking Parklands is shown as white land when it is part of the site's developable area that is allocated for residential use. This should be hatched red on the Policies Map. • Comments from Mead Realisations regarding the residual capacity, and assertion that their part of the site can accommodate an additional 250 dwellings. The potential of this is being explored through the formal pre-application process.
Former Leisuredome allocation/Parklands site B (phase E), Weston-super-Mare	1	<ul style="list-style-type: none"> • Support for the allocation, request for the LPA to consider increasing the capacity to 420 dwellings to maximise the use of brownfield land. Commitment to deliver a strategic cycle route.
Weston Rugby Club, Weston-super-Mare	1	<ul style="list-style-type: none"> • Observation from Sport England that any proposal that would result in the loss of playing pitches will need to be assessed against the NPPF and Sport England's policies.



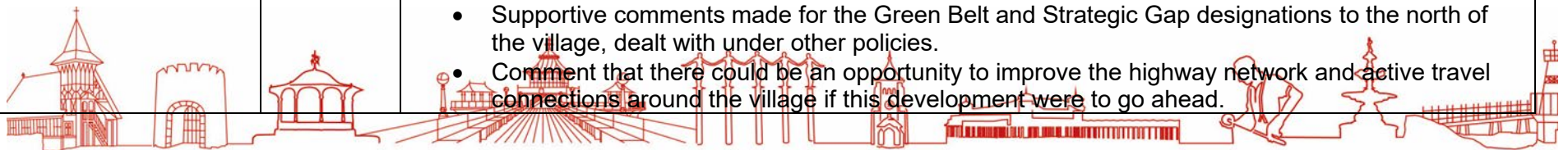
Site	Number of responses	Summary of issues raised
Land west of Winterstoke Road, Weston-super-Mare	1	<ul style="list-style-type: none"> • Observation from Sport England that any proposal that would result in the loss of playing pitches will need to be assessed against the NPPF and Sport England's policies.
Dolphin Square	2	<ul style="list-style-type: none"> • 1 comment of support for the allocation. • 1 comment from the Birnbeck Conservation Group expressing disappointment that this site continues to be allocated for residential development.
Former Bournville School site, Weston-super-Mare	1	<ul style="list-style-type: none"> • Observation from Sport England that any proposal that would result in the loss of playing pitches will need to be assessed against the NPPF and Sport England's policies.
Castlewood, Clevedon	1	<ul style="list-style-type: none"> • Objection from resident that no previous consultation has taken place on this, and that potential congestion would arise from the access point.
Land at north west Nailsea	4	<ul style="list-style-type: none"> • 1 respondent supported the allocation but offered no comments. • Observation from Sport England that any proposal that would result in the loss of playing pitches will need to be assessed against the NPPF and Sport England's policies. • 1 comment objecting to the proposal on the basis of flood risk, access arrangements and environmental concerns. • Request for additional requirement to be added to the site specific details listed in the policy from National Grid: "The development will be developed with the following site-specific criteria: a strategy for responding to the NGET proposed Hinkley Point C Connection present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."



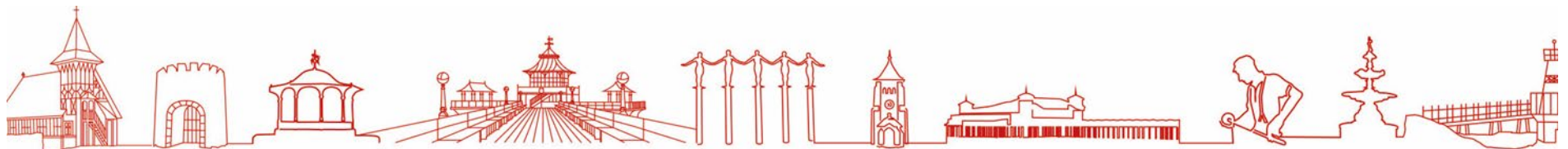
Site	Number of responses	Summary of issues raised
Youngwood Lane, Nailsea	3	<ul style="list-style-type: none"> • 1 respondent supported the allocation but offered no comments. • Comments of concern regarding scale, and that this site is not well related to the town centre and that it is an unsustainable location. • Reference to the safeguarded transport corridor through the site, but concern that without this being extended to the west it will not enable public transport access.
West of Engine Lane, Nailsea	3	<ul style="list-style-type: none"> • 1 respondent supported the allocation but offered no comments. • Observation from Sport England that any proposal that would result in the loss of playing pitches will need to be assessed against the NPPF and Sport England's policies. • Request for additional requirement to be added to the site specific details listed in the policy from National Grid: "The development will be developed with the following site-specific criteria: a strategy for responding to the NGET proposed Hinkley Point C Connection present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."
Land south of The Uplands, Nailsea	1	<ul style="list-style-type: none"> • 1 respondent supported the allocation but offered no comments.
Trendlewood Way, Nailsea	1	<ul style="list-style-type: none"> • 1 respondent supported the allocation but offered no comments.
Land east of Youngwood Lane, Nailsea	1	<ul style="list-style-type: none"> • 1 respondent supported the allocation but offered no comments.
Wyndham Way Broad Location, Portishead	1	<ul style="list-style-type: none"> • 1 comment from a landowner within the broad location observing that it appears confusing as this broad location is displayed differently to other residential allocations on the policies map.
Land south of Downside, Portishead	1	<ul style="list-style-type: none"> • Objection from resident regarding inclusion of the site for allocation.



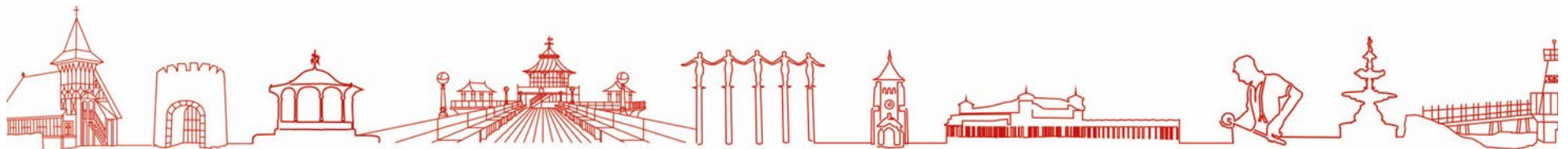
Site	Number of responses	Summary of issues raised
Grove Farm, Backwell	265	<p>Considerable level of objection to proposed allocation. Main themes raised as follows:</p> <ul style="list-style-type: none"> • The amount of growth directed towards Backwell is disproportionate compared to other villages, and will lead to a 35% increase in the amount of housing in Backwell when considered alongside other proposals in the area. The cumulative impact of these schemes is unacceptable. • The Local Plan appears to disregard the made Backwell Neighbourhood Plan. • Transport and travel – particular references to pedestrian and highway safety and congestion on the A370, Backwell Crossroads, Station Road, Dark Lane, Chelvey Road, Church Lane, Backwell Common and Chapel Hill. Some comments regarding capacity at the railway station and issues with accessibility. Multiple comments regarding bus services and the proposed Bus Service Improvement Plan proposals in the locality and wider area, particularly in relation to Dark Lane. Recognition by some respondents that active travel improvements could be put in place. • Respondents refer to a lack of employment opportunities in Backwell, meaning that any future residents will commute out of the village on a daily basis. • Concerns regarding local infrastructure. Reports that schools, doctors and dentists are already overstretched and that adding additional housing will exacerbate this. • Many comments refer to the loss of green fields and the implications of this on the environment and ecology, with particular references to impact on bats. • Concerns regarding the loss of best and most versatile agricultural land and the implications of this on local food production. • Comments regarding impact on heritage assets including listed buildings and Chelvey Conservation Area. • Responses advocate directing the quantum of development proposed in Backwell to urban areas instead, or in particular to the Ashton Vale location included in earlier drafts of the local plan. • Residents note previous surface water flooding occurrences in the area. • Concerns regarding the impact development in this location would have on the character of the area. • Numerous observations that it is proposed to extend the settlement boundary to include this proposed allocation. • Supportive comments made for the Green Belt and Strategic Gap designations to the north of the village, dealt with under other policies. • Comment that there could be an opportunity to improve the highway network and active travel connections around the village if this development were to go ahead.



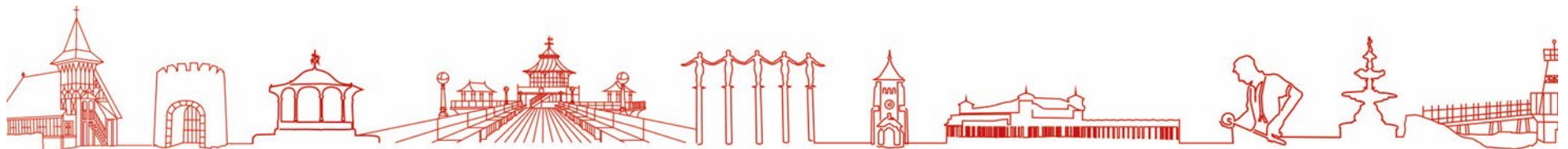
Site	Number of responses	Summary of issues raised
Land at Farleigh Farm, Backwell	17	<p>Site specific main issues referred to in objections include:</p> <ul style="list-style-type: none"> • Traffic and congestion issues nearby and throughout the village. • Concerns regarding the loss of agricultural land and amenity space. • Impacts on wildlife and ecology. • Pressure on local infrastructure, such as schools and healthcare. • Risk of flooding in the location. • Multiple comments relate to the cumulative impact of all of the proposed growth around Backwell and how this represents overdevelopment. Comments also refer to conflict with the Backwell Neighbourhood Plan. • Acknowledgement from a couple of respondents that this site already benefits from outline planning consent.
Land west of Rodney Road, Backwell	19	<p>Site specific main issues referred to in objections include:</p> <ul style="list-style-type: none"> • Access arrangements (narrow, difficult, obstructions from parked cars) • Impact on playing fields, local junior football club, guide and scout facilities and general leisure and recreation. This is referred to as a popular local walking route. • Traffic and congestion issues will be exacerbated. • Concerns regarding loss of agricultural land. • Potential impact on wildlife and ecology. • Pressure on infrastructure, such as schools and healthcare. • Impact on the existing adjacent school, during the construction phase and beyond. • Multiple comments relate to the cumulative impact of all of the proposed growth around Backwell and how this represents overdevelopment. Comments also refer to conflict with the Backwell Neighbourhood Plan.
Land west of Wolvershill Road, Banwell	1	<ul style="list-style-type: none"> • 1 objection from local resident on the basis of inadequate infrastructure and the loss of agricultural land.



Site	Number of responses	Summary of issues raised
Bleadon Quarry, Bleadon	1	<ul style="list-style-type: none"> Query regarding the footpaths referred to within the schedule and whether discussion has taken place with the landowner.
Land off Purn Way, Bleadon	1	<ul style="list-style-type: none"> Query regarding the footpaths referred to within the schedule and whether discussion has taken place with the landowner.
Land east of Ladymead Lane, Churchill	1	<ul style="list-style-type: none"> 1 objection from local resident on the basis of inadequate infrastructure and cumulative impact of growth in Churchill.
Woodhill Nurseries, Congresbury	2	<ul style="list-style-type: none"> Comment from Congresbury Parish Council objecting to the proposed allocation as development would impact on Cadbury Hill. Other comments raise concerns around accessibility, public transport, highway safety and impact on the allotments.
Land at Mead Farm, Sandford	2	<ul style="list-style-type: none"> 1 comment of support from developer promoting the site. Request for additional requirement to be added to the site specific details listed in the policy from National Grid: "The development will be developed with the following site-specific criteria: a strategy for responding to the NGET proposed Hinkley Point C Connection present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."
Land at North End, Yatton	1	<ul style="list-style-type: none"> Objection from local resident on the basis of inadequate infrastructure.
Moor Road, Yatton	2	<ul style="list-style-type: none"> 1 respondent supported the allocation but offered no comments. 1 objection from local resident on the basis of inadequate infrastructure.
Rectory Farm, Yatton	1	<ul style="list-style-type: none"> 1 objection from local resident on the basis of inadequate infrastructure.



Site	Number of responses	Summary of issues raised
Tickenham Garden Centre, Tickenham	1	<ul style="list-style-type: none"> Request for additional requirement to be added to the site specific details listed in the policy from National Grid: “The development will be developed with the following site-specific criteria: a strategy for responding to the NGET proposed Hinkley Point C Connection present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.”
Land north of Colliter’s Way, Long Ashton	4	<ul style="list-style-type: none"> Support from Bristol City Council, noting that this site is contiguous with their boundary and adjacent to land that they propose to allocate in their Local Plan. The site also adjoins the Bath and North East Somerset boundary, and they would welcome ongoing dialogue in respect of any impacts on the highway network. This is noted. Supportive comments received from Taylor Wimpey who own the land within Bristol’s administrative boundary, that is adjacent to this proposed allocation. Noted that they support the site specific requirements as drafted. Supportive comments received by the landowner of the northern part of the allocation, particularly in respect of the site requirement that access should not be taken off of Colliter’s Way. They request additional requirements that would specify: <ul style="list-style-type: none"> - Main vehicular access to be taken off A38 Bridgwater Road - Demonstrate how the amenity of existing properties has been protected.



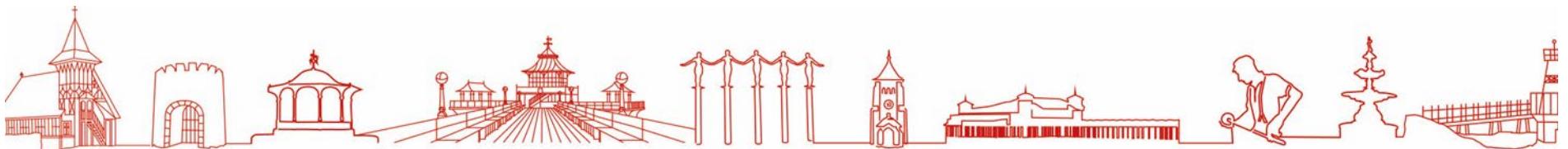
Site specific comments for schedule 2: Proposed employment sites

Of the 18 employment/mixed allocations were received comments on the following 4 sites. No comments were received in relation to the other 14 proposed employment/mixed allocations.

Site	Number of responses	Summary of issues raised
Parklands Village site H	1	<ul style="list-style-type: none"> Support from developer for the allocation.
Parklands Village site I	1	<ul style="list-style-type: none"> Support from the developer for the allocation.
Land to the east of J20, Clevedon	27	<ul style="list-style-type: none"> Objections from the Clevedon Craft Centre and local residents to the proposed strategic employment allocation. Objections are on ground of access issues, heritage impact, flood risk, loss of open space/ecology, landscape impact.
Wyndham Way Development Framework Area (excluding the Gordano Gate allocation)	1	<ul style="list-style-type: none"> Phoenix Life Ltd (owner of the Old Mill Road Site and the Wyndham Way Retail Park in Portishead town centre) supports the allocation of the site as a mixed-use development opportunity including the objective of increasing the net number of jobs in the area overall but has queried elsewhere in its representations on the Local Plan, specifically on Policy LP17, the source of evidence base to justify the identified area of 3.75 hectares of employment land delivering 600 new jobs to ensure the Plan is based on up to date evidence and thus justified.

Support/other comments:

- A list of the housing and employment allocations within the wording of the policy would assist the usability of the plan and its monitoring.
- Allocations do not make reference to the need to consider the additional healthcare infrastructure requirements arising from the proposed level of housing growth.



LP3: Educational, sporting, leisure and community use allocations and Schedule 4

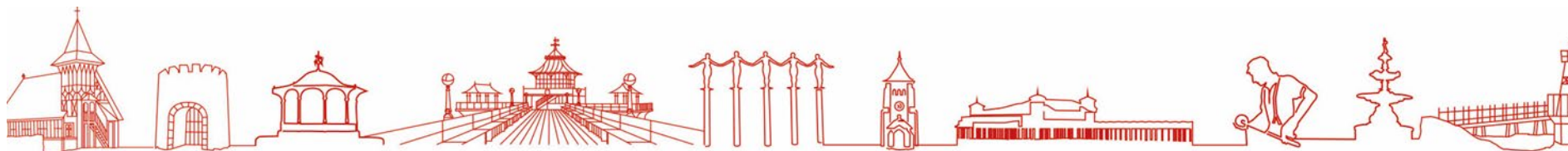
Level of response to this policy:

Number of representations received: 9
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 3 No: 4 Unsure: 0 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 3 No: 0 Unsure: 1 No answer: 5
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 2 No: 1 Unsure: 1 No answer: 5

Main issues raised:

- The Councils playing pitch and built facilities strategies are out of date so there is no robust evidence for the sites allocated in LP3, others may be needed.
- In relation to the Wolverhill strategic allocation LP3 and schedule 4 should refer to the provision of land only (not delivery of) two 420 place primary schools rather than one secondary school and one 210 place primary school.
- Also the policy should reference contributions to offsite provision of recreation facilities rather than the provision of these within the site.
- There is no additional NHS provision designated in Churchill.
- Need new cinema/concert hall in Portishead.
- Policy should reference statutory requirement to replace Backwell leisure centre and refurbish Scotch Horn Leisure Centre.
- Should allocate changing rooms at the playing field north of Greenfield Crescent in Nailsea (funded by development). These can be funded by development.

Site specific comments for schedule 4: Proposed community facilities:



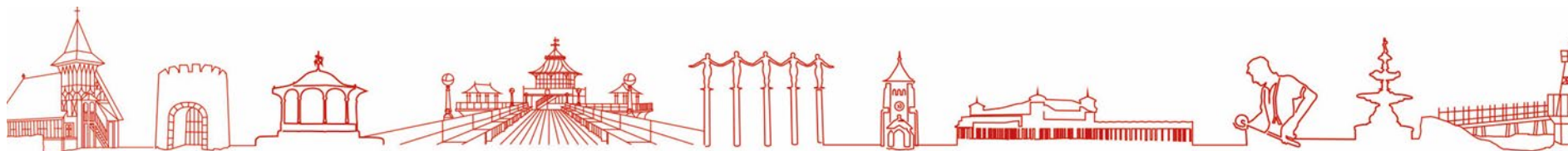
Of the 10 community facility allocations were received comments on the following 4 sites. No comments were received in relation to the other 6 proposed community facility allocations.

Site	Number of responses	Summary of issues raised
Land at The Batch, Yatton	2	<ul style="list-style-type: none"> • Yatton Parish Council: Yatton already has two primary schools, one of which is underfilled. There is insufficient space at this site to accommodate a secondary school. The land should be used to expand the Mendip Vale Medical Practice currently located close by in Mendip Road, Yatton. • Objection to the allocation from Persimmon based on need for a primary school.
Grove Farm, Backwell	1	<ul style="list-style-type: none"> • Objection to residential allocation at Grove Farm.
Wolvershill Strategic Site	1	<ul style="list-style-type: none"> • Support from resident.
Land at Ladymead Lane, Churchill	1	<ul style="list-style-type: none"> • Support for the allocation from the Department of Education who confirms that there remains a significant demand for the school.

LP4: Settlement boundaries and Schedule 5

Level of response to this policy:

Number of representations received: 41
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 6 No: 31 Unsure: 1 No answer: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 8 No: 7 Unsure: 19 No answer: 7



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **4** No: **11** Unsure: **17** No answer: **9**

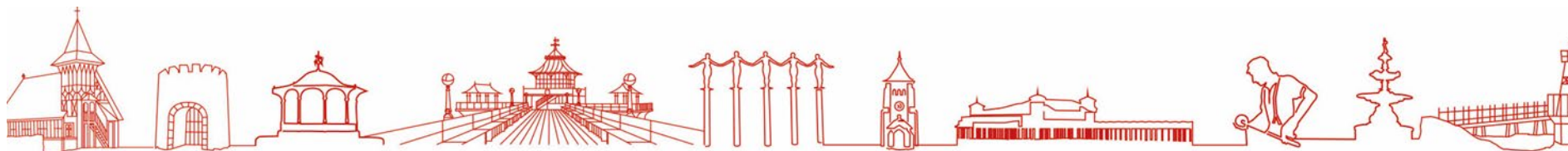
Main issues raised:

- Objections to the settlement boundary being extended to include the proposed allocation at Grove Farm on the western side of Backwell.
- Settlement boundaries are tightly drawn which will limit the opportunity to deliver windfall development, upon which the plan is heavily reliant. This approach is more restrictive than the extant plan policy requirement which provides flexibility to meet housing need by making allowance for proportionate growth where relevant criteria are met adjacent to the settlement boundaries.
- Query over the boundary shown in the Strategic Housing Land Availability Assessment and the proposed settlement boundary at Bleadon are different.
- Schedule 5 should be altered to include the Land to the south of Old Banwell Road, Locking and to the north of Banwell Road, Elborough as a settlement meaning that Policy LP4 applies to development within its boundaries.

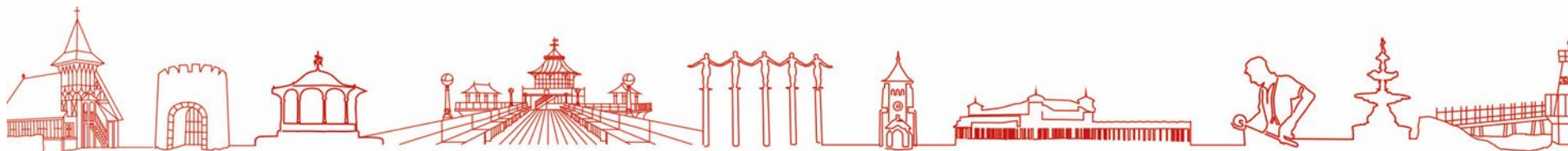
Site specific comments for schedule 5: Settlement boundaries:

Of the 36 settlements with boundaries comments were received on the following 16 boundaries. No comments were received in relation to the other 20 settlement boundaries.

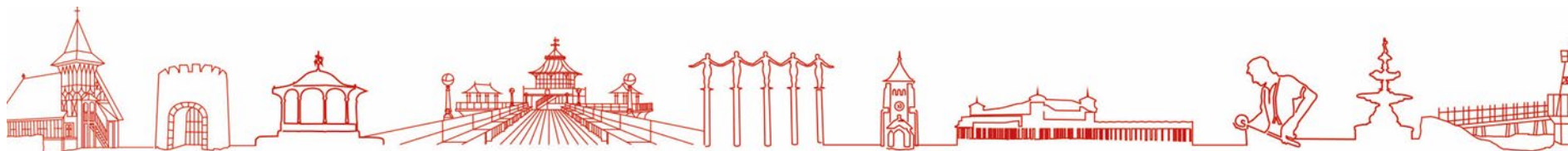
Site	Number of responses	Summary of issues raised
Abbots Leigh	2	<ul style="list-style-type: none"> • Suggested adjustment to settlement boundary at Abbots Leigh to include land to the north west and south east to enable more housing, services and facilities • Suggested amendment to settlement boundary at Abbots Leigh to exclude areas from being within the settlement boundary



Site	Number of responses	Summary of issues raised
Backwell	5	<ul style="list-style-type: none"> • Objection to extension to the settlement boundary at Backwell to include proposed allocation, particularly Grove Farm. • Objection to the incidental inclusion of land between the existing settlement boundary and the proposed allocation at Grove Farm, which are contrary to the criteria set out in the Settlement Boundary Review Topic Paper and provide opportunities for further residential development. • Objection that the Backwell settlement boundary extends into Brockley Parish. • The settlement boundary should be adjusted to include the whole of Farleigh Fields. The remaining excluded area consists of proposed Local Green Space and the Western Field which almost abuts the proposed District Centre. It is illogical for it to be outside the settlement boundary.
Banwell	1	<ul style="list-style-type: none"> • Land to the south of Knightcott Road, Banwell should be included in the settlement boundary for Banwell.
Blagdon	1	<ul style="list-style-type: none"> • The Development boundary for Blagdon misses residential properties on the north western edge of the village which are contiguous with the residential layout of the village. The residential curtilage of Fir Tree Farmhouse and Clanders Batch Bungalow have both been missed from the Development Boundary plan and should be included.
Bleadon	1	<ul style="list-style-type: none"> • Suggestion that more land to the North of Purn House Farm Industrial Units [shown in Red] would be more suitable than the land to the West [shown in Purple], due to visibility from other vantage points in the village. It would also be less close to the SSSI. That Northern land is a more gentle slope and would suit light domestic development, consistent with the village growth. It is no flood risk and south facing for passive heating
Churchill	1	<ul style="list-style-type: none"> • The settlement boundary for Churchill/Langford as defined on the emerging Policies Map and referenced in Policy LP4 should be extended to include the University of Bristol site in Langford as now allocated under LP16. It should be extended to wrap around the entire university campus, including adjoining university owned land reflecting the important role that the site has within the local community and wider area.



Site	Number of responses	Summary of issues raised
Cleeve	2	<ul style="list-style-type: none"> • A site is located on land off Main Road close the centre of the settlement of Cleeve should be included in the settlement boundary. • Land behind No.3 Main Road Cleeve should be included in the settlement boundary.
Clevedon	1	<ul style="list-style-type: none"> • Kenn Road Business Park should be included in the settlement boundary of Clevedon.
Dundry	1	<ul style="list-style-type: none"> • Land to the south of Dundry should be included in the settlement boundary
Failand	2	<ul style="list-style-type: none"> • Suggestion that three omission sites (see LP2) at Failand are included in the Failand settlement boundary • Wraxall and Failand Parish Council supports a settlement boundary at Failand.
Nailsea	2	<ul style="list-style-type: none"> • Request that The Elms be considered as part of Nailsea in any Boundary Review, as well as land to the North of Nailsea, taking both out of the Parish of Wraxall and Failand. • Comment of support.
Tickenham	2	<ul style="list-style-type: none"> • Tickenham should be called "Tickenham (Part)" as not all of the village of Tickenham is within the settlement boundary. • Land to the east of Hill Lane should be included in the settlement boundary
Weston-in-Gordano	1	<ul style="list-style-type: none"> • Sprigg Farm in should be included in the settlement boundary
Weston-super-Mare	2	<ul style="list-style-type: none"> • The land south of Mannock Gardens and Farnborough Road which is covered by the extant outline permission ref 13/P/0997/OT2 for Locking Parklands is shown to lie outside the settlement boundary. It should be included in the settlement boundary. • Objection to the exclusion of land on Bleadon Hill, which is an omission site under LP2, from the settlement boundary.



Site	Number of responses	Summary of issues raised
Wroughton	1	<ul style="list-style-type: none"> Request that Cox's Green Phase 2 at Wroughton is included in the settlement boundary.
Yatton	2	<ul style="list-style-type: none"> Extend the settlement boundary at Yatton to include more land around the Smart Systems site Request that Chestnut Farm in Yatton is included in the settlement boundary

Support/Other Comments:

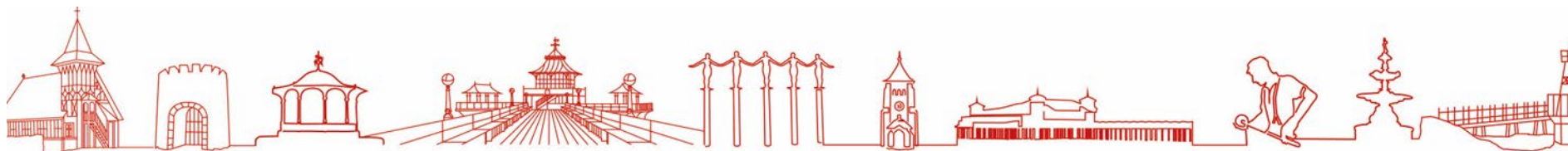
- Support for the inclusion of a settlement boundary around Failand by Wraxall and Failand Parish Council.
- Support for inseting GB villages.

LP6: Extent of the Green Belt

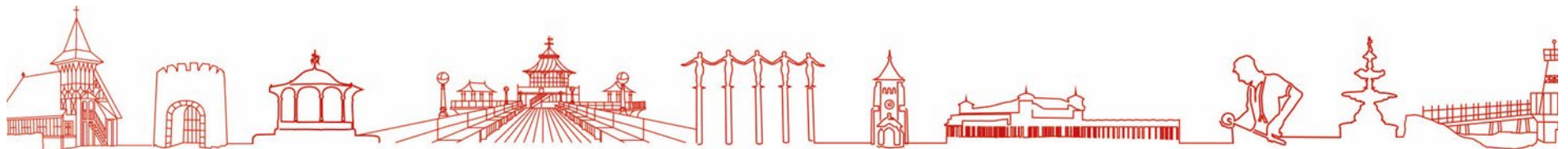
Level of response to this policy:

Number of representations received: 45
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 9 No: 31 Unsure: 1 No answer: 4
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 9 No: 12 Unsure: 14 No answer: 10
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 3 No: 18 Unsure: 14 No answer: 10

Main issues raised:



- The narrow northern projection of Green Belt designation to the east of Markham is anomalous. The land is largely hidden from public view, visible only from a single location in Brookside. There are no public footpaths or other rights of way crossing this area. Designating this area as Green Belt does not serve any one of the specific five purposes of the Green Belt which are stated in paragraph 138 of the National Planning Policy Framework.
- Green Belt land should not be removed around Bristol Airport. The Airport would no longer need to demonstrate very special circumstances. Any further growth in flight traffic will have a significant negative impact on climate and the environment. Removing the Green Belt makes this easier. I do not believe the North Somerset Local Plan demonstrates the requirement in the NPPF to prove 'exceptional circumstances' and thus is flawed.
- Cleeve Parish Council objects to the changes to the settlement boundaries and Green Belt. These changes bring some areas within Settlement Boundaries and take the village out of Green Belt. The loss of Green Belt not being equalised and the need to preserve the Strategic Gap between Cleeve and Claverham must be taken into account. Part of the settlement boundary to be removed was not even situated within Cleeve but was in the settlement boundary of Claverham. A change to another part of the settlement boundary would, potentially, bring a declined and inappropriate development within the boundary.
- The new Green Belt has not been justified. The proposed new Green Belt is contrary to NPPF as it does not fulfil any of the five purposes of a green belt designation. The proposed new Green Belt is unsound against the test of soundness. In order to be considered sound, the proposed new Green Belt should be removed entirely. If, however, the proposed Green Belt is found to be necessary, the eastern boundary north of Moor Lane should follow existing physical features, namely the alignment of the existing watercourse and residential garden boundaries.
- In order to make this policy sound, it is recommended that NSC undertakes a further assessment of Green Belt sites as there are exceptional circumstances to justify the release of additional land to meet housing needs. It is also recommended that the land north-west of Easton-in-Gordano is released from the Green Belt. The site is located at the outer edge of the Green Belt and contributes very little to the openness of the countryside or other purposes of the designation. The site is also in a highly sustainable location, being within close proximity to existing and proposed public transport facilities.
- The Council need to undertake a full Green Belt review and allocate more sites for housing, including possibly some within the Green Belt.
- Sustainable sites within the Green Belt should be brought forward, especially sites that have been evidenced by past Green Belt reviews as not performing well against the purposes of green belt as set out under chapter 13 of NPPF. Land north west of Easton in Gordano should not be categorised as Green Belt and presents a valuable opportunity to contribute to the housing needs of the immediate area.



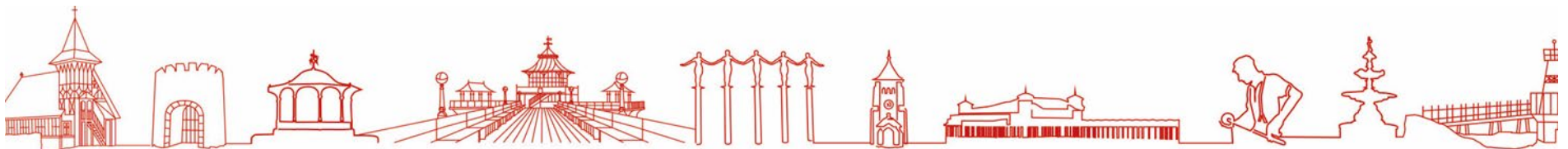
- Exceptional circumstances that were evidenced to justify the release of Land East of Backwell from Green Belt in previous iterations of the emerging Plan appear to have been simply ignored. The land should be allocated as a residential-led mixed-use development.
- A combination of the acute housing requirement and flood risk constraints means that further Green Belt land will need to be released to sustainably accommodate the district's housing needs. Combined, these would form the exceptional circumstances to justify the release of Green Belt land.
- Need to release the Sheepway Farm site from the Green Belt to accommodate development for port uses.
- The policy should be amended to include reference to Land at Tower Farm, Portishead being released from the Green Belt for residential development. Delete the following paragraph: 'Development of land released from the Green Belt will be required to demonstrate high sustainability standards and compensate for the loss of Green Belt. These requirements will be set out in the detailed allocations and planning guidance.' National policy does not include any additional tests over and above needing to be satisfied that exceptional circumstances exist to release land from the Green Belt for development. This requirement for high sustainability standards to be achieved is therefore overly onerous and contrary to national policy. It might be that certain design criteria are included in a policy which allocates a given site such as to minimise harm to the Green Belt but not to require something additional to be achieved beyond the exceptional circumstances test.
- The LPA is encouraged to conduct a Green Belt review that assesses suitable surrounding sites that can properly inform the Council's future decisions around the merits of meeting housing need within Failand. To do this, the Green Belt review needs to identify land around each settlement.
- The draft allocations released from the Green Belt under regulation 18 should be reinstated before Local Plan examination.

Support/Other Comments:

- Green Belt extension between Nailsea and Backwell is welcomed. There are exceptional circumstances for the extension on the basis of the existing visual coalescence of the settlements, the need to protect against the physical merger of the settlements.

LP7: Strategic gaps

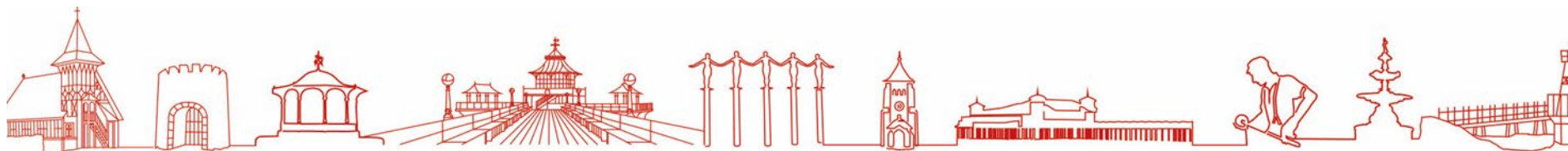
Level of response to this policy:



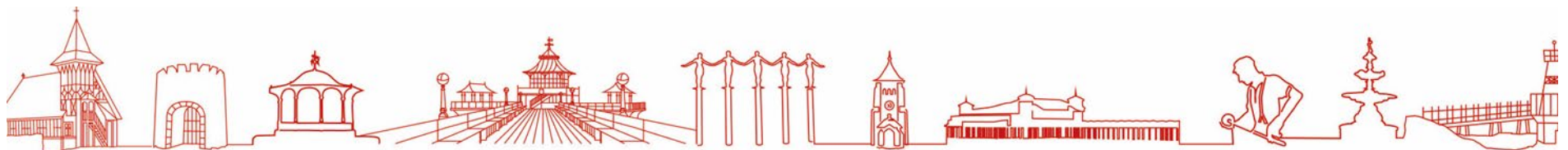
Number of representations received: 29
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 6 No: 21 Unsure: 0 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 7 No: 3 Unsure: 8 No answer: 11
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 5 No: 5 Unsure: 8 No answer: 11

Main issues raised:

- Welcome the strategic gap between Churchill and Sandford but question whether it is large enough to fulfil its purpose. It should be extended southward, and along an east-west axis.
- The Council has provided no specific evidence to justify the need for strategic gaps in addition to the protection afforded to the countryside. Objection to the inclusion of a strategic gap around Parklands Village. Following a review some strategic gaps are being removed although it is not clear in all cases why this is being proposed.
- Objection to the inclusion of a strategic gap between Yatton and Congresbury.
- The strategic gap for Banwell should be extended southwards across the A371 to prevent erosion of countryside between Knightcott and Banwell. There is risk of ribbon development along the A371.
- A strategic gap is needed between Banwell and Sandford.
- Support Banwell Parish Council's suggestion for an extension of the proposed strategic gap at Wolvershill but the outer boundary should not be restricted to inside the line of the Banwell Bypass, but should instead extend further eastwards towards Sandford.
- The Wolvershill strategic gap should trace the inner curve of the proposed Banwell Bypass, extending towards the A368, thereby forming a green corridor around the northern periphery of the village to the border of Banwell Woods.
- Designation of a strategic gap between Sandford and Churchill is not necessary to maintain the sense of physical separation between the two settlements, separated by a significant expanse of intervening countryside. Serious concerns regarding the 13 criteria and the way in which they have been applied.
- With removal of the strategic gap between Nailsea and Backwell it is essential that this Green Space is maintained between the villages through the extension of the Green Belt as proposed.



- The Strategic Gap between Nailsea and Backwell should only be removed if the Green Belt is extended to the west. The strategic gap should be maintained regardless of the outcome of any changes to the Green Belt. The proposed designation does not extend to the urban settlement boundary, essentially leaving an area of 'white land' between the settlement boundary and the proposed Green Belt extension.
- A Strategic Gap should be established in the north of Bleadon.
- For compliance with national policy, the plan needs to identify additional sites. The natural and Green Belt policy constraints already significantly limit North Somerset's ability to satisfy housing need. Strategic Gaps, much like the Green Belt, are some of the most sustainable locations to meet the needs of community. Strategic Gap policy must not align itself to Green Belt policy as to surreptitiously create the same policy barrier.
- There is no official definition for strategic gaps within the NPPF or NPPG. Instead, strategic gaps can be explored where such proposals are aligned with the thrust of national policy and guidance, ensuring that plan-makers take a proportionate, evidence based approach.
- Object to draft Policy LP7 in its current form and specifically the latest addition of the Sandford and Churchill strategic gap. There is no official definition for strategic gaps within the NPPF or NPPG.
- Sustainable development opportunities can often come forward in such designations as strategic gaps without, eroding the sense of separation between settlements, or resulting in the loss of openness and character. Should Policy LP7 be retained it should be modified to allow for a balancing exercise which assesses any harm to the visual or functional separation of settlements against the benefits of development.
- The policy requires a degree of flexibility. It should be changed to clarify there is flexibility to accommodate potential community, education or active Green Infrastructure uses that are required to serve adjacent communities, where this provision is in the best interests of the masterplanning and delivery of wider development, and in a way that is consistent with the location and function of the Strategic Gap. For instance Wolverhill/ Banwell strategic gap has significant potential for and should provide recreational, sports and community facilities as well as biodiversity to the benefit of both communities.
- The boundary of the Wolverhill/Banwell strategic gap at Stonebridge Farm fails to have regard to the true extent of the farm's curtilage and developed area.
- Object to a new strategic gap between the village of Sandford and Churchill which includes a site that is currently subject to a live planning application. The proposed strategic gap is overly restrictive, and its extent is not justified. It seeks to prevent development to the west of Churchill and to the east of Sandford yet the gap extends to the east of Hilliers Lane to the south of the village of Churchill. Hilliers Lane, acts as a logical and defensible barrier to development.



- The Moss II land, occupying an area to the west of Locking Parklands Village, should be removed from the strategic gap. It would not diminish the purpose or long-term effectiveness of the gap, and its development would relate cohesively to the existing development at Parklands Village and the adjoining settlement of Locking.
- A strategic gap between Clevedon and Tickenham and Clevedon and Kenn/Yatton should be considered.

Support/other comments:

- Support for the inclusion of strategic gaps in the plan
- Supportive of this policy and agree with the current extent of the Strategic Gaps as shown in the Policies Map. These gaps should be protected even in the event that the Council has to find additional housing sites to meet overall housing needs in North Somerset. They play an important role in maintaining the local character and distinctiveness of the settlements, and the sense that they are separate places.
- Use of proposed strategic gaps within the plan is supported, in principle, where there is clear evidence that specific gaps between settlements play an important role in maintaining character and distinctiveness, and to prevent harmful coalescence.
- The justification for the creation of strategic gaps is supported.
- Support the strengthening of the strategic gap between Nailsea and Backwell.
- Support designation of the Banwell and Wolverhill strategic gap and agree with use of the bypass as the defensible boundary to the northern edge.

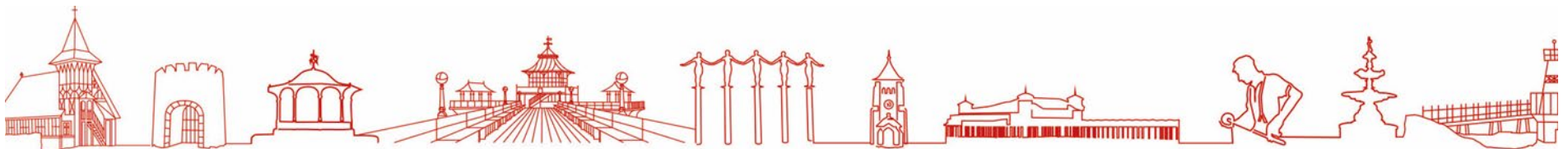
LP8: Transport infrastructure, allocations and safeguarding and Schedule 7.

Level of response to this policy:

Number of representations received: **37**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **6** No: **22** Unsure: **3** No answer: **6**



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

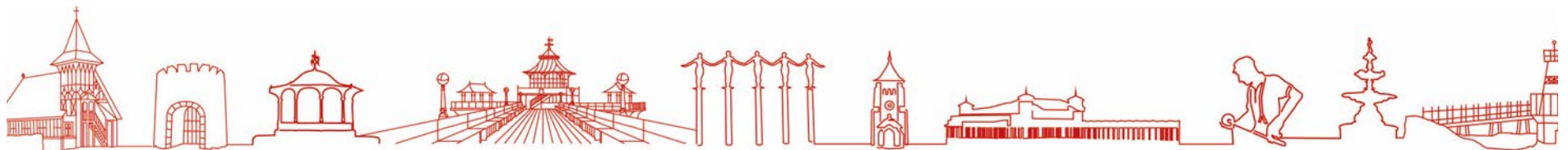
Yes: **8** No: **1** Unsure: **14** No answer: **14**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **6** No: **3** Unsure: **14** No answer: **14**

Main issues raised

- Concern from Network Rail about accessibility issues at Nailsea & Backwell Station and the potential for overcrowding particularly in school peak times. Request for consideration of this as development comes forward.
- Concern over the ability of the transport network around Backwell and Nailsea to accommodate additional demand from proposed residential allocations in the plan (Grove Farm and existing permission for Farleigh Fields), including impacts on the A370 Backwell Crossroads, nearby rural lanes network and train and parking capacity at Nailsea & Backwell Railway Station. Lack of infrastructure improvements identified to mitigate the impacts.
- Concern over North Somerset Council's Bus Service Improvement Plan proposals to shut the Dark Lane arm of the A370 Backwell Crossroads to through traffic, citing potentially unsafe alternative accesses onto the A370 at Church Lane and impact of re-routed HGVs on local roads.
- Question as to whether that transport policies should be explained and justified in the context of the land-use policies of the Local Plan and not rely on the Joint Local Transport Plan which has not been subject to the same procedures for public engagement and examination.
- Concern that Policy LP8 is too short term and not ambitious enough. Suggestions of other transport improvements not included, such as re-opening previously closed railway stations, integrated ticketing, timetabling and co-location of different public transport modes.
- Commuting by bike, bus or rail is not likely to provide a reliable or quick commute from Nailsea to popular places of work such as Bristol.
- Concern that the proposed additional growth in the Weston-super-Mare area will have an impact on transport for car, bus and rail users, as well as additional traffic from the Banwell Bypass. Concerns specified are for A370/Somerset Avenue, the M5, Queensway and could impact emergency services access if there is regular congestion. Significant traffic capacity schemes have been suggested.
- Specific proposal received to improve a current road junction at A370/Bleadon Road.

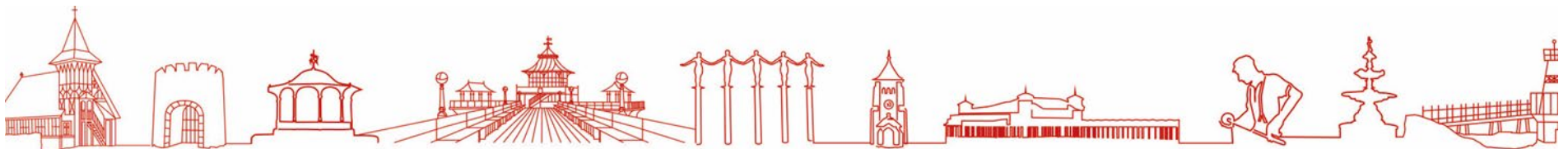


- Concern that Infrastructure Delivery Plan scheme TR11: Transport corridor within consented Youngwood Lane site, Nailsea does not link to other roads.
- Concern over reduction of specific bus services in the Nailsea and Backwell area, eroding not only the services but user confidence in public transport as a whole.
- Request to make Queen's Road in Nailsea a 30mph speed limit, instead of a 40mph at present.
- In order to achieve a significant switch to active travel and public transport a policy of implementing a host of smaller local improvements is necessary.

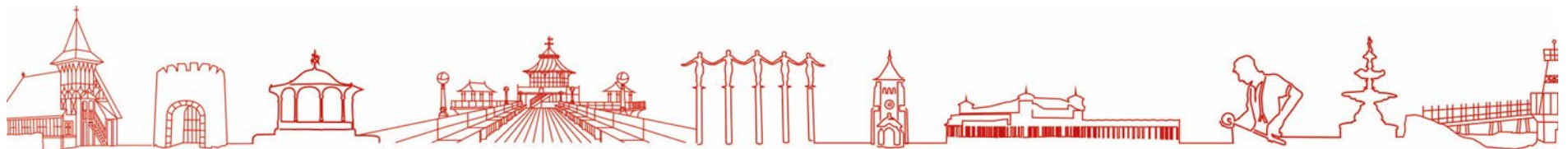
Scheme specific comments for schedule 7: Transport Infrastructure, allocations and safeguarded routes.

Of the 63 schemes proposed in schedule 7 we received comments on the following 13 schemes.

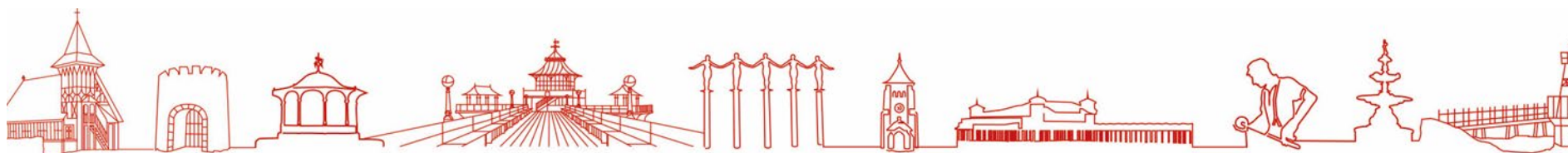
Scheme	Number of responses	Summary of issues raised
J21 Bypass Scheme	1	<ul style="list-style-type: none"> • Promotion of land for development around Junction 21
Banwell Bypass	1	<ul style="list-style-type: none"> • Support for the identification of this scheme in the Local Plan.
Re-opening Portishead Passenger Rail Line including new stations at Portishead and Pill with car parking and associated facilities	1	<ul style="list-style-type: none"> • Exolum pipeline – check schemes for any impact on pipelines.
Reserved transport corridor within consented Youngwood Lane development, Nailsea	3	<ul style="list-style-type: none"> • Route does not connect with a road or bus route. • Support for the reserved corridor • Future extension of this route would be across flood plain.



M5 Junction 20 buffer	2	<ul style="list-style-type: none"> The new highway connection and active travel links from Junction 20 of the M5 to new business site allocated on 'Land to east of J20, Clevedon' is strongly supported. Suggestion for additional motorway junction.
Corridor extending 10 metres either side of the railway land boundary fence to allow for access and double track	2	<ul style="list-style-type: none"> This is a key piece of infrastructure but needs to be executed properly. It is likely that those affected by the safeguarding policy may be unaware of its existence. It will have a blighting effect on property. The safeguarding policy is totally unjustified, has significant consequences for many landowners and it needs to be examined in detail.
Worle railway station	1	<ul style="list-style-type: none"> Policy LP8 and the Proposals Map should be amended to remove the area of safeguarded land currently identified within the land adjacent to Worle Station. For robustness, the policy should also contain an appropriate mechanism for assessing proposals for alternative development on the residual safeguarded areas.
Nailsea Backwell railway station	2	<ul style="list-style-type: none"> Concern that the disabled access at the station is not proposed to be implemented. Disabled people cannot use the station and are directed to travel to Yatton instead. This applies to many ambulant disabled people not just those in wheelchairs. Not only is access to and from the platforms impossible for many but the platforms themselves have high and irregular step-heights to the trains. Yet the Plan only refers to lengthening the platforms.



Nailsea Backwell railway station (transport hub)	3	<ul style="list-style-type: none"> The proposed hub lies at the tight bottle neck where Station Road becomes a single lane under the railway bridge; in addition Station Close forms a T-junction with Station Road at this point ; and the junction and railway tunnel is teeming with pedestrians at school opening and closing times and with those train passengers arriving and leaving the station by foot. This "Transport Hub" is of no use unless other transport measures are included in the Plan. Double decker buses cannot pass under the railway bridge which limits the use of Station Road for buses. No buses terminate at the station, or are ever likely to, as the economics of routes here depend upon passing through both Nailsea AND Backwell. Buses would not turn off Station Road to use a transport hub as this would just cause delays. A new crossing of the railway has been ruled out yet such a crossing would allow for huge improvements for active travel and bus operations centred on the station and could make a transport hub worthwhile. Concern that the disabled access at the station is not proposed to be implemented
Brean Down Way (Uphill Marina to the River Axe) (active travel route)	1	<ul style="list-style-type: none"> Support for route.
Clevedon to Nailsea via the Moors. Strategic cycle link between Nailsea and Clevedon (active travel route)	3	<ul style="list-style-type: none"> Support for an active travel route connecting these towns.
Strawberry Line Extension: Congresbury to Blagdon (active travel route)	2	<ul style="list-style-type: none"> Concern that this is not a realistic or deliverable proposal. Objection from landowner – the route crosses private land and the proposed extension of the travel route is not justified as it does not provide links to further public rights of way in this area.
Easton-in-Gordano/Pill: Marsh Lane to A369 Motorway Service Area (active travel route)	1	<ul style="list-style-type: none"> Exolum pipeline – check schemes for any impact on pipelines.
Royal Portbury Dock Bridleway access under M5 (active travel route)	1	<ul style="list-style-type: none"> Exolum pipeline – check schemes for any impact on pipelines.

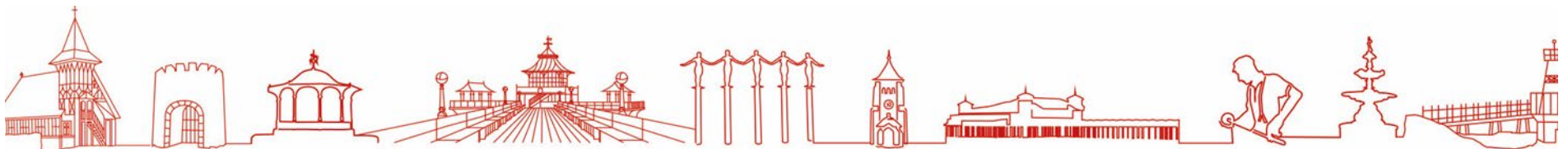


Support/other comments:

- Continued commitment from Network Rail to work closely with North Somerset Council, including to bring about the reopening of the Portishead to Bristol Temple Meads rail line and investigation of rail freight interchange and other improvements at Portbury Docks.
- Support for proposals for transport hubs at or near NSC's railway stations, which is consistent with first and last mile travel principles, including Worle, which could be developed as a gateway station, serving the Weston sub region as well as providing public transport interchange with bus services for Bristol Airport. Welcome the platform lengthening proposals for Nailsea & Backwell, Worle and Milton.
- Weston Southern Rail Chord – potential future alignment is noted by Network Rail and although further evidence is not yet provided by NSC, NR will consider this on merit if brought forward under any future MetroWest South proposals for upgrading the Weston area rail network.
- Interest in more information on the Bus Rapid Transport scheme for Weston-super-Mare as a potential alternative public transport solution, instead of new rail infrastructure in the area.
- The reduction in the number of houses proposed by the Pre-submission Plan for the Nailsea and Backwell area, partly due to the lack of deliverable transport infrastructure to bypass Backwell Crossroads, is welcomed.

LP9: Bristol Airport**Level of response to this policy:**

Number of representations received: 23			
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?			
Yes: 1	No: 17	Unsure: 1	No answer: 4
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?			
Yes: 1	No: 9	Unsure: 6	No answer: 7

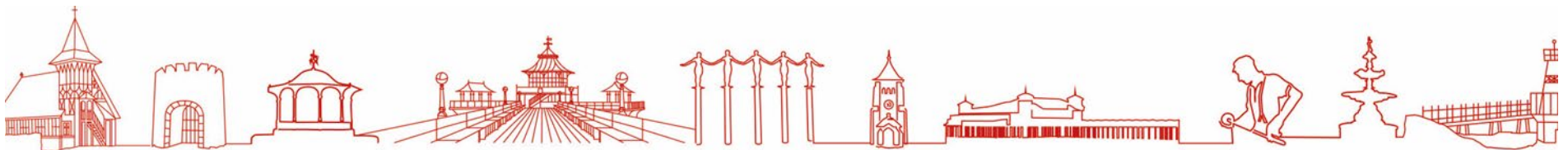


Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: 2 No: 10 Unsure: 4 No answer: 7

Main issues raised:

- The expansion of Bristol Airport to allow for 12 million passengers per annum is contrary to Green Belt policy and should be halted. Local residents should have been provided with further documentation on the Bristol Airport expansion.
- Previous consultations on LP preparation (Nov 2020 and March 2022) have promoted greater protection of Green Belt land, setting the context for preparation of the Pre-submission Plan. The proposal to remove the airport from the Green Belt has come out of the blue. Removal of the airport's Green Belt status will weaken NSC's control over the discharge of outstanding conditions pursuant to permission of the airport to expand to 12mppa passenger throughput and its ability to withstand future growth to 20mppa or beyond in the future. An Airport Master Plan needs to be in place and operational before any consideration of the airport's removal from the Green Belt should be contemplated.
- When Bristol Airport applied to expand from 10 million passengers per annum to 12 mpa, it made no mention of any intention to have its land removed from the Green Belt, so there was no indication for local people and interested parties at that time that this would be considered. Local communities have never been consulted about the specific issue of taking the airport out of the Green Belt.
- Protection of horseshoe bats. When the latest expansion was agreed, the airport committed to creating a wildlife area that would provide habitat for rare horseshoe bats, whose foraging would be disrupted by the expansion plans. It will take some time to know whether or not that provision of habitat is working to achieve the necessary protection.
- The Airport should not be taken out of Green Belt. It is essential that the areas known as Cogloop 1 (Silver Zone Phase 1 car park) and Cogloop 2 (Silver Zone Phase 2 car park) should both be retained in Green Belt under the precautionary principle, in case of a crash in population of the Greater and Lesser Horseshoe Bats. The preparation and consultation of the SPD within Bristol Airport Policy LP9 should be published for consultation before the Local Plan is determined in order that residents are informed of development proposals on the south side of the Airport in Green Belt.
- Bristol Airport will be expected to define and deliver a low carbon, accessible, integrated, and reliable transport network, for both staff and passengers to access the airport when they need to and support the delivery of infrastructure that prioritises lower emission vehicles. The airport is also expected to limit the increase in demand for additional car parking provision. The airport must also address the operational impact on the environment, such as air quality, noise and landscape impact. As well as impacts from aircraft, airports generate air pollution from a number of other sources including ground based power and heating, equipment to service



aircraft, on-site vehicles and airport-related traffic on surrounding roads (staff, passengers and freight). Aircraft noise is a major environmental concern for communities impacted by aviation operations, particularly in relation to night time flights.

- A Master Plan illustrating how BA plans to expand the airport in the future should be produced as a Supplementary Planning Document as a matter of urgency.
- National Highways request that the policy text is changed to either include reference to the strategic road network/M5, or the policy text is amended to refer to the highway network more generally. This is necessary as the scope and location of mitigation requirements for as yet unspecified development is not known at this stage.
- In order to make the plan sound, the Airport requests that the Green Belt inset is extended to include the extension to the Silver Zone car park as permitted under the 12 mppa planning permission and is extended north of the runway to accommodate longer-term development to circa 15mppa. Alternatively, a safeguarded area could be allocated for future airport expansion north of the runway, which will set the parameters for growth. Consideration should also be given to the role of hydrogen in decarbonising the aviation industry during the Plan period and plan positively for hydrogen infrastructure including the spatial requirements for fuelling operations. The draft LP9 requires all proposals for development of facilities and infrastructure to be accompanied by 'an agreed surface access strategy' - this requirement would confuse and undermine the planning and monitoring arrangements that are already in place as part of the 12 mppa planning permission. The policy should be amended to recognise the agreed Surface Access Strategy.
- In order to reduce noise pollution, measures should be put in place to reduce the number of flights operated into and out of Bristol Airport, and its hours of operation reduced to 07:30 to 21:30 on weekdays, and 09:00 to 18:30 at weekends.

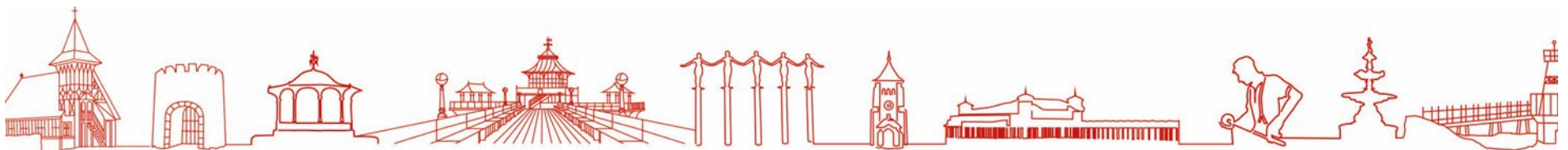
LP10: Air safety

Level of response to this policy:

Number of representations received: **1**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **0** No: **1** Unsure: **0** No answer: **0**



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **0** No: **1** Unsure: **0** No answer: **0**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **1** No: **0** Unsure: **0** No answer: **0**

Main issue raised:

- The Public Safety Zones shown on the Policies Map do not accord with the current Public Safety Zones at Bristol Airport. The current Zones were updated in 2021 in line with DfT requirements and were shared with NSC at the time. This is a factual change to ensure the Plan is accurate and legally compliant.

LP11: Royal Portbury Dock

Level of response to this policy:

Number of representations received: **5**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **2** No: **2** Unsure: **0** No answer: **1**

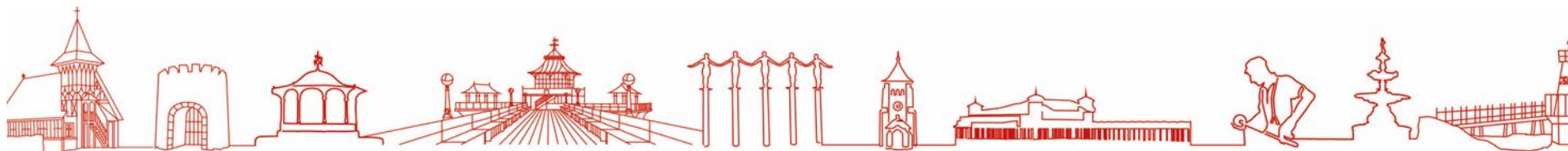
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **1** No: **1** Unsure: **0** No answer: **3**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **1** No: **1** Unsure: **0** No answer: **3**

Main issues raised:



- The port site is crossed by or close to National Grid Electricity Transmission NGET assets and additional wording needed: ‘The development will be developed with the following site-specific criteria: a strategy for responding to the NGET proposed Hinkley Point C Connection present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.’
- National Highways requests that the policy text either includes reference to the strategic road network or amended to refer to the highway network more generally as the scope and location of mitigation requirements for as yet unspecified development is not known at this stage. Junction 19 of the M5 can operate under constraint at peak times, and it should be acknowledged that the capacity of this access and the need to maintain safe and effective performance of the motorway junction will need to be carefully considered when evaluating potential port development. May also be helpful add a reference in the policy text to mitigating transport impacts.
- Must consider the Port’s request for expansion. The policy states that development at will be supported provided that it requires a port location and that changes of use to uses not requiring a port location will not be permitted. BPC strongly objects on the basis that this is overly prescriptive and not positively prepared. It fails to recognise, and will indeed prohibit, a range of uses which may be more appropriately located at RPD. Whilst many uses could in theory be located outside of RPD, it may be preferential for certain types of development to be sited within RPD for a wide range of reasons such as operational efficiency, sustainability, clustering and reduction of vehicles movements.
- Policy is supported but why is Portishead singled out for mention as a source of employment but not Portbury or Pill? Pill has a long history or connection with the Port and many local people work at RPD. A requirement for improved transport (especially active transport) links for Pill workers would be welcome.

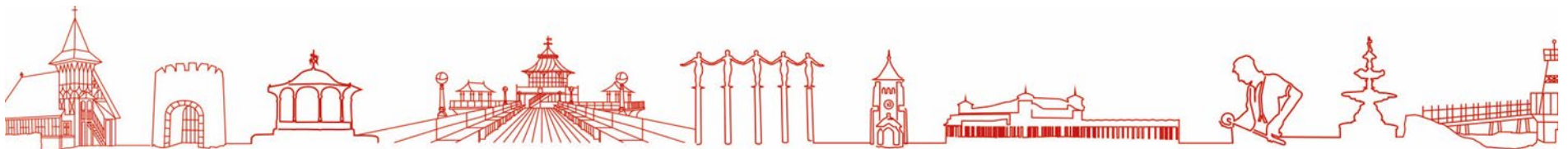
LP12: Local Green Space and Schedule 3

Level of response to this policy:

Number of representations received: **10**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **3** No: **4** Unsure: **1** No answer: **2**



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

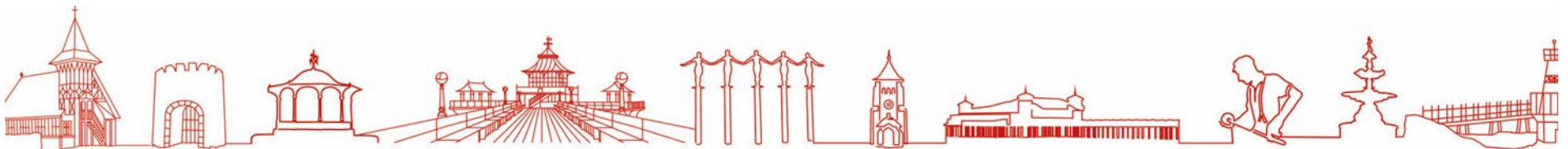
Yes: **3** No: **0** Unsure: **4** No answer: **3**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **3** No: **1** Unsure: **3** No answer: **3**

Main issues raised:

- The village of Yatton has an inadequate amount of green space. Consideration should be given to transforming derelict spaces near the railway station into parks, playgrounds or wildlife-friendly green zones.
- Policy does not state an overall aim of Local Green Spaces, and does not refer to openness, but requires that any proposal that has an adverse effect on beauty, historic importance, recreational value, tranquillity or richness of wildlife will be refused, unless there are very special circumstances. This implies that any adverse effect on any of these attributes, however minor, would mean very special circumstances have to be demonstrated. The policy could be clearer on the positive outcomes it is seeking and help owners and managers of Local Green Spaces understand what changes might be possible.
- Congresbury Millennium Green, Congresbury - this is an area designed for flood storage at times of high flows, inclusion as a green space must not restrict its prime function.
- Gang Wall, Yatton - this is an area designed for flood storage at times of high flows, inclusion as a green space must not restrict its prime function.
- Schedule 3 identifies 3 local green spaces for Locking Parklands including South of Cruikshank Grove and McCrae Road, Parklands Village, South of Post Office Road Parklands Village and SE corner of Parklands Village (SE of Bowen Rd, S of Mannock Gardens and S of Farnborough Rd). This policy, however, does not recognise permissions that are in place at Locking Parklands where development could be compatible with the reasons for designation such as NEAPs, LEAPs, earth bunds etc. Recognising the permissions meets the objective in Policy DP8 on efficient use of land, which requires 'all parts of the site to have a positive purpose.' Schedule 3 should be modified to include a column for site specific requirements or to amend the justification details to 'include development in accordance with the established planning permissions'.
- Quinney's Wood off Davis Lane, on the boundary of Clevedon/Kenn should be LGS. Believe it is owned by the Environment Agency, recently planted with native trees.
- In Nailsea the following should be LGS: Lions Green; Spilsbury Wood; the land intended for extension of the cemetery; The Grove; the Village Green; and the land owned by North Somerset Council off Youngwood Lane and south of White Oak House.

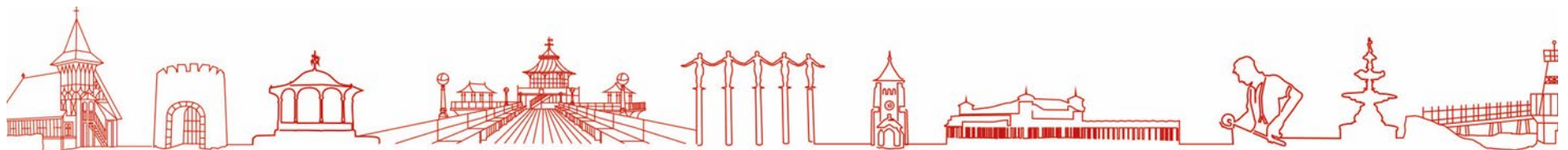


- Land at Brookside, Easton-on-Gordano should be LGS. It was originally a local primary school playing field but over the years has changed to be much more of a village resource. Wooden play equipment for older children was added along with bridges to access walks around the woodland on one side, and a community meadow to promote wildflower growth in the playing field edges. There has been a recorded increase in bat activity and other wildlife. A tranquil place, this is used for community picnics and forest schools and provides a much needed play and family area on the edge of the village.
- At Nailsea the Morgan's Hill area and the land south of Grove School and west of Sedgemoor Close should be LGS being heavily used for recreation. Other adjacent areas (Uplands, Land off Engine Lane, etc) have been allocated to building development, reducing the available green space for local residents.
- At Nailsea land between Newton Green, Worcester Gardens, Blakeney Grove and The Bramleys should be LGS. North of this area is Hannah More Park west of the allotments and east of Hannah More Road, with children's play equipment.
- Land at Brookside, Pill and Easton-in-Gordano should be included as LGS. The site has play equipment and is now managed as an open space for nature recovery and recreation. An area is maintained for football or other games, whilst hedges and other tree planting have been added and areas set aside to develop as wild flower meadows.
- Jenny's Meadow, Pill and Easton-in-Gordano, at the end of Avon Road should be included as LGS. The site is leased by the Parish Council from Royal Portbury Dock and is managed mainly for its wildlife value. Trees have been planted and the rest of the site is being developed as a wild flower meadow, but tracks are mown regularly to enable ease of public access.

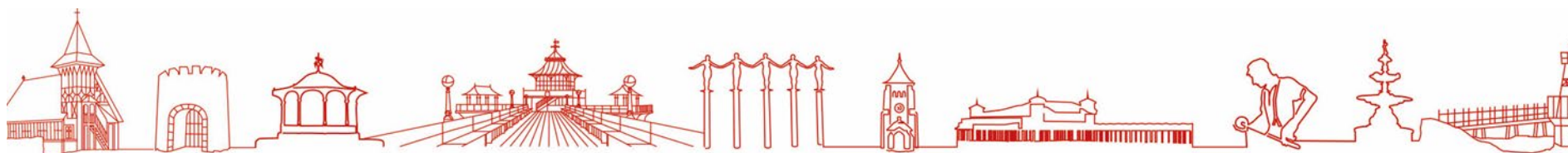
Comments made to sites in Schedule 3:

Of the 167 Local Green Space designations proposed comments were received on the following 16 proposed designations. No comments were received in relation to the other 151 proposed Local Green Space designations.

Site	Number of responses	Summary of issues raised
Farleigh Fields, Backwell	9	<ul style="list-style-type: none"> • All of Farleigh Fields should be Local Green Space.
Backwell Lake	2	<ul style="list-style-type: none"> • Support



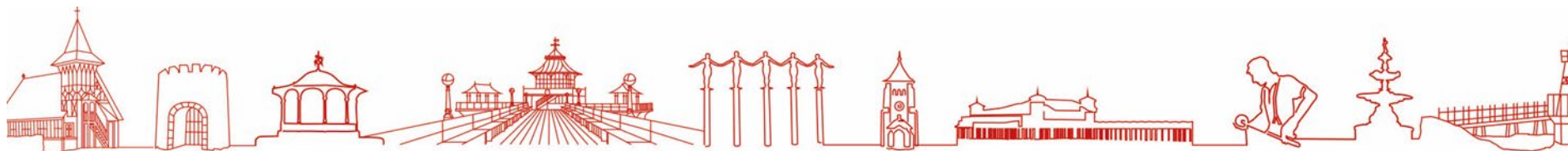
Park adjacent to West Leigh Infants School, Backwell	3	<ul style="list-style-type: none"> Support
Alexandra Gardens, Clevedon	1	<ul style="list-style-type: none"> No comment.
Recreation area adjoining King George V Jubilee playing field, Congresbury	1	<ul style="list-style-type: none"> LGS at the recreation area adjoining King George V Jubilee playing field, Congresbury should be larger to also include the whole area between the tennis courts, recreation ground and play area.
Broadstones recreation ground, Congresbury	1	<ul style="list-style-type: none"> Support
Locking Green, Locking	1	<ul style="list-style-type: none"> The Green Space listed for Locking Village should be changed from Locking Green to Locking Village Park.
Leigh Woods National Nature Reserve north to Long Ashton parish boundary	1	<ul style="list-style-type: none"> Land at Leigh Woods is already highly designated and protected, and for this reason and site management reasons, the National Trust question the justification for designating it as Local Green Space. It is NNR, SSSI and SAC, and lies within the Green Belt. An LGS designation could raise public expectations of recreational use of the southern part, and lead to misunderstandings (for example when a path has to be closed to prevent erosion or protect habitats). Also the National Trust has declared its land at Leigh Woods as 'inalienable' preventing the land from being sold or mortgaged against the Trust's wishes without a special parliamentary procedure. If the designation is proceeded with, it should align with the NNR boundary in Long Ashton parish. The NNR excludes a short section of railway, which is included in the proposed LGS. Potentially any LGS should also exclude the railway.
Scotch Horn Park, Nailsea	2	<ul style="list-style-type: none"> The Scotch Horn, Nailsea LGS site also includes an outside gym and teen shelter.
Nowhere Wood and land west of Bibury Close, and north of Avening Close, Nailsea	1	<ul style="list-style-type: none"> Support
Moorend Spout nature reserve, Nailsea	1	<ul style="list-style-type: none"> Support.



Land north of Macrae Road, Ham Green, Easton in Gordano/Pill	1	<ul style="list-style-type: none"> Query over why other sites in this area have not been included such as Brookside and Jenny's Meadow (see above).
Land north of Vowles Close, bordering north east edge of Nailsea	1	<ul style="list-style-type: none"> Designation supported by the Parish Council.
The Old Quarry off Wrington Hill, Wrington	1	<ul style="list-style-type: none"> Land at The Old Quarry off Wrington Hill, Wrington should not be LGS. The land is privately owned woodland, with no public rights of way or permissive paths running over it. Public access is not encouraged due to the unsafe nature of the land following the previous quarrying use.
Land at Redhill (Church Road/ Redhill (A38) junction)	1	<ul style="list-style-type: none"> The proposed LGS designation for Land at Redhill (Church Road/ Redhill (A38) junction) should be removed. The land is privately owned, with no public rights of way or permissive paths running over it. It does not meet the requirements of para 106 of the NPPF.
St Mary's church yard	1	<ul style="list-style-type: none"> Concern over what the LGS designation means for the future of the churchyard.

Support/Other Comments:

- Support for the policy around the protection of local green space and would encourage the council to go further by offering the same level of protection to these spaces as the Green Belt given these local green spaces are often valued in a similar manner.
- As planning permission will not be easily granted for any land designated as LGS, this will allow some sites in Nailsea to be protected for recreational use.
- Support the identification of the Local Green Spaces in Clevedon.
- Support the LGS at Backwell Lake.
- Strongly LGS north of Vowles Close, bordering north east edge of Nailsea.
- Support the LGS at the park by West Leigh Infants school. This is a space which is valued by the local residents and by the children who live nearby.



LP13: Preferred Area for mineral working – land at Hyatts Wood Farm, south of Stancombe Quarry

Level of response to this policy:

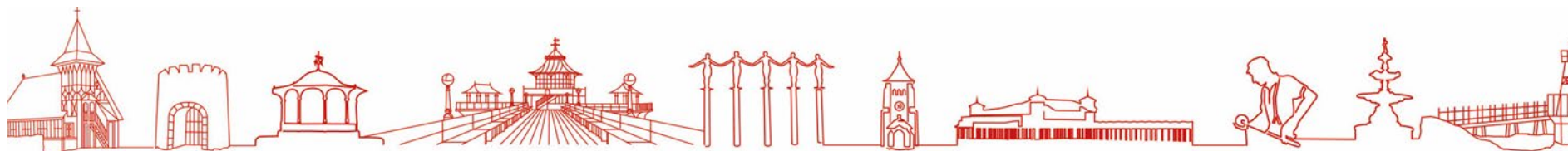
Number of representations received: 4
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 3 No: 1 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 1 Unsure: 0 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 1 Unsure: 0 No answer: 2

Main issues raised:

- Development must be aligned with the Environment Agency's approach to groundwater protection and used as a basis for drafting the groundwater/surface water protection sections & references.
- All dewatering associated with mineral workings needs to now have an abstraction licence.
- The proposed development has been identified as being in a Source Protection Zone (SPZ). Within a SPZ the Environment Agency will normally object in principle to any planning application for a development that may physically disturb an aquifer. Developers or operators may need to supply site specific information to demonstrate that the risks are acceptable and can be mitigated.
- The policy should be more positively worded to make it clear that applications for minerals development will be permitted provided that the criteria are satisfied.

Support/other comments:

- The allocation to ensure sufficient provision is made to maintain the rock landbank including at the end of the plan period, and ensure a steady and adequate supply of rock is supported.



- The policy provides the potential for the continuation of the existing Stancombe Quarry in an environmentally sensitive and carefully designed manner which minimises impacts on the local area.
- The requirement that proposals must take satisfactory measures to safeguard against adverse effects on water and water resources, including appropriate depth of extraction is important due to the site being located in a groundwater Source Protection Zone. The requirement for biodiversity, flood risk and other environmental matters to be addressed is supported.

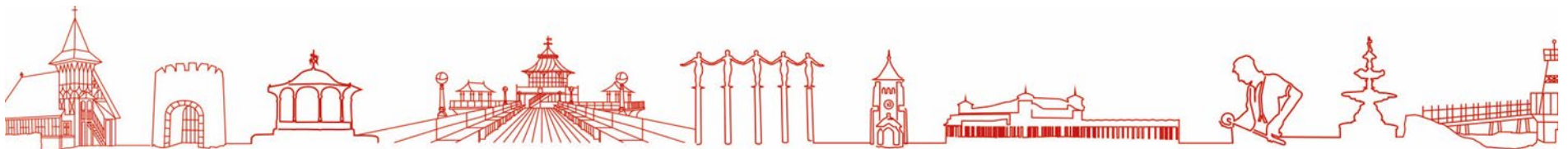
LP14: Area of Search for minerals working – land at Downside Farm, south of Freemans Quarry

Level of response to this policy:

Number of representations received: 5
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 3 No: 1 Unsure: 0 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 1 Unsure: 0 No answer: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 1 Unsure: 0 No answer: 3

Main issues raised:

- The policy should be more positively worded to make it clear that applications for minerals development will be permitted provided that the criteria are satisfied.
- Development must be aligned with the Environment Agency's approach to groundwater protection and used as a basis for drafting the groundwater/surface water protection sections & references. All dewatering associated with mineral workings needs to now have an abstraction licence.. The proposed development has been identified as being in a Source Protection Zone (SPZ). Within a SPZ the Environment Agency will normally object in principle to any planning application for a development that may physically disturb an



aquifer. Developers or operators may need to supply site specific information to demonstrate that the risks are acceptable and can be mitigated.

- Need to factor in the negative impact of increased mineral mining on the local communities and the two major roads, A370 & A38. Reduce the expected output and associated HGV traffic. Consider utilising other parts of North Somerset not just the north.

Support/other comments:

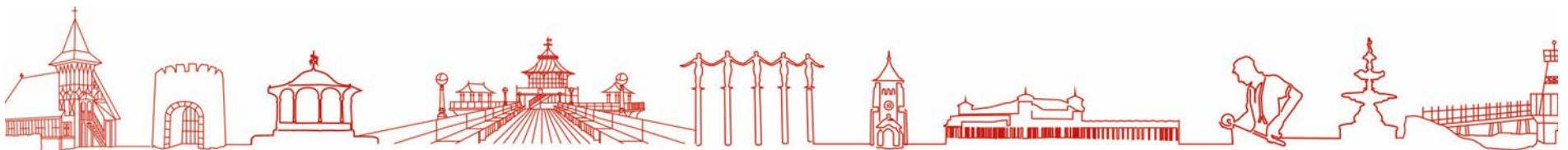
- Support allocation to ensure sufficient provision is made to maintain the rock landbank including at the end of the plan period and ensure a steady and adequate supply of rock.
- Support the requirement that proposals must make satisfactory measures to safeguard against adverse effects on water and water resources, including appropriate depth of extraction. This is important due to the site being located in a groundwater Source Protection Zone. Welcome the requirement that biodiversity, flood risk and other environmental matters need to be addressed.
- Support from the operator to the identification of Downside Farm as an extension to its Freemans Farm Quarry.

LP15: Minerals Safeguarding Area for carboniferous limestone

Level of response to this policy:

Number of representations received: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 3 No: 0 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 2 No: 0 Unsure: 0 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 2 No: 0 Unsure: 0 No answer: 1

Main issues raised:



- The MSA appears to be focused on sites that are being worked or have been worked rather than safeguarding the wider limestone resource. The BGS map of the area indicates that the resource extends to the south and east of the proposed MSA and so should also be included within the MSA in accordance with Planning Practice Guidance.

Support/other comments:

- General support for the safeguarding of the resource and delineation of the MSA which clearly sets out the reasoning for safeguarding in accord with the NPPF and has identified a suitable area on the Policies Map that will provide the necessary safeguarding for the plan period.

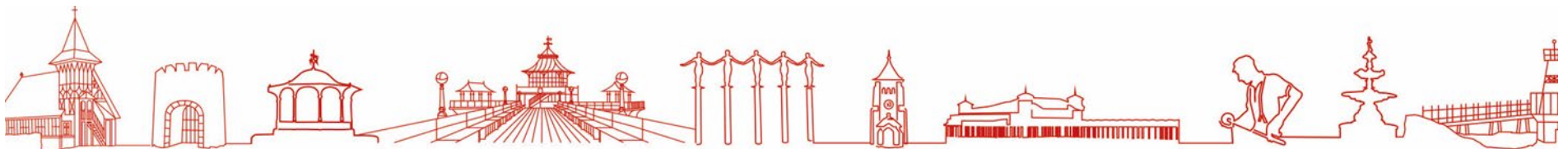
LP16: University of Bristol site in Langford

Level of response to this policy:

Number of representations received: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 0 No: 1 Unsure: 1 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 1 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 1 Unsure: 0 No answer: 0

Main issues raised:

- The University of Bristol strongly supports emerging policy subject to the drafting changes proposed and this permissive policy allocation acknowledges that the site is an important facility located within North Somerset in terms of its educational and employment



benefits. The boundary for emerging allocation should be amended to reflect the red line boundary as shown in the representations which includes adjoining university land. The amended settlement boundary for Churchill/Langford should also be extended to wrap around the entire university campus. The policy as currently written needs to be a bit more flexible and less prescriptive, avoiding the use of 'must' and more appropriately 'could' or 'should'.

Support/other comments:

- Support for policy requirement to improve access between the campus and local facilities through improved walking and cycling routes along Stock Lane to ensure safe pedestrian access to the site as Stock Lane is currently very dangerous.

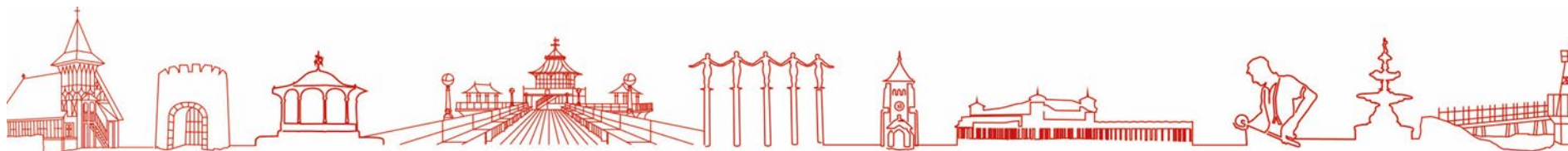
LP17: Wyndham Way

Level of response to this policy:

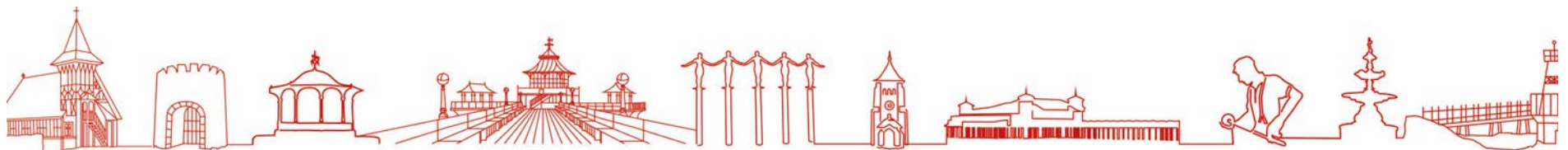
Number of representations received: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 1 No: 2 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 1 Unsure: 0 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 1 Unsure: 0 No answer: 1

Main issues raised:

- Question the deliverability of the Wyndham Way proposals:
 - Multiple land ownerships make site assembly and agreement of masterplan complex and slow.



- Some land is likely to be within flood zone 3 so development here is inadvisable.
- Affordable housing is unlikely because of viability issues.
- Employment opportunities in Portishead should be increased not decreased and residents have consistently objected to employment land loss.
- Clarification needed of evidence base to support LP allocations and reference to the Portishead Neighbourhood Plan removed.
- Policy could include reference to blue infrastructure (in addition to green) as the site allocation includes the main watercourse Portbury Ditch. By encouraging the enhancement of blue infrastructure as part of this policy, the local plan policy could bring benefits to the area's watercourse and its wildlife. Site is within flood zone 2 and 3, therefore flood risk issues will need to be addressed.



Development Policies

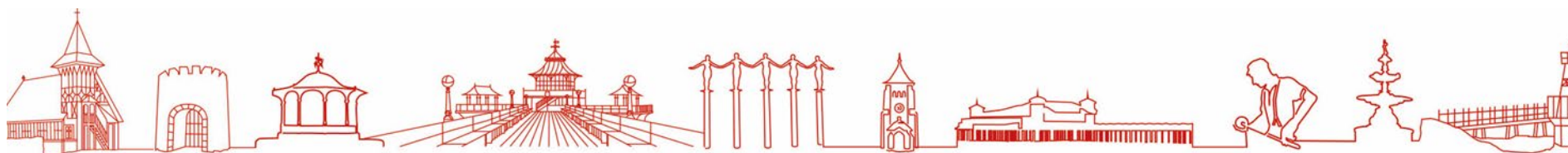
DP1: High Quality Design

Level of response to this policy:

Number of representations received: 25
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 4 No: 18 Unsure: 0 No answer: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 5 No: 8 Unsure: 3 No answer: 9
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 5 No: 8 Unsure: 2 No answer: 9

Main issues raised:

- Policy should allow flexibility for innovative design approaches to respond to site characteristics.
- Too lengthy and detailed. Should focus on key aspects of design for North Somerset and criteria should be removed to the supporting text or a design guide.
- Use of the phrase 'account will be taken of' is ambiguous.
- Query over the wording stating that major development should be accompanied by design and access statements, parameter plans and Community Engagement Statements as these are already covered by national and local validation requirements.
- Policy DP1 is not consistent with a local list of planning application requirements and does not provide sufficient flexibility, raises issues of soundness in respect to the effectiveness of the policy. The penultimate paragraph should either be deleted or amended as follows 'Major development proposals should be accompanied by the relevant documents as set out in the most up-to-date local validation list.'



- Suggestions to include 'where appropriate' in a number of bullet points to allow flexibility for circumstances where the requirements of the policy cannot be met.
- Should include a reference to respecting existing site constraints including utilities situated within sites.
- Allocate land east of Backwell to promote high quality design.
- Seeks to give SPDs the same status as Local Plan policies, so final paragraph should be removed.

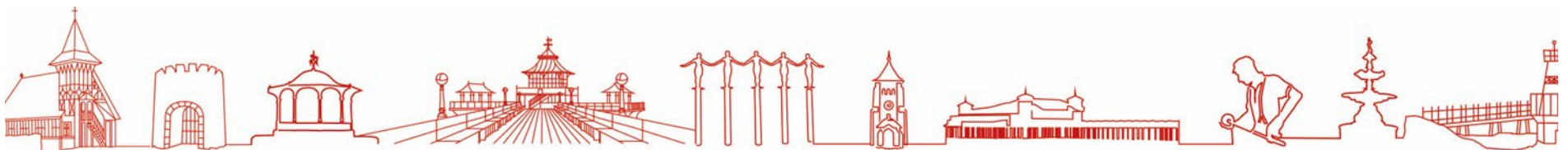
DP2: Residential development within settlement boundaries

Level of response to this policy:

Number of representations received: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 1 No: 0 Unsure: 0 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 0 Unsure: 0 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 0 Unsure: 0 No answer: 2

Main issues raised:

- The fourth point of DP2 'The design, form, scale and building materials are in keeping with the area' could be in conflict with several aspects of DP5. For example a new, sustainable, net zero type of dwelling may not be in keeping with the poorly insulated concrete buildings around it.
- Add the clarification that sustainable, energy efficient design (DP5) takes priority over the design and building materials being in keeping with the area.



DP3: Residential extensions

Level of response to this policy:

Number of representations received: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 1 No: 0 Unsure: 0 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 0 No: 0 Unsure: 0 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 0 No: 0 Unsure: 0 No answer: 2

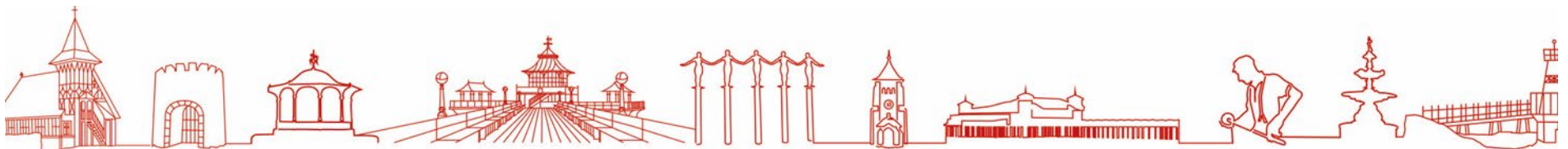
Main issues raised:

- Environment Agency recommend that the policy also requires that there are no bedrooms on the ground floor in any proposed development that is located in a flood risk area (e.g. flood zone 2 or 3).

DP4: Houses in multiple occupation and residential subdivision.

Level of response to this policy:

Number of representations received: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 1 No: 0 Unsure: 0 No answer: 1



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **0** No: **0** Unsure: **0** No answer: **2**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **0** No: **0** Unsure: **0** No answer: **2**

Main issues raised:

- Environment Agency highlights that if self contained flats are to be proposed as part of this policy, there is a potential flood risk impact that would need to be assessed for those sites in a flood risk area (e.g. flood zone 2 or 3).

Support/other comments:

- The policy provides choices, variety and goes some way to meet the needs of all.

DP5: Climate change adaptation and resilience

Level of response to this policy:

Number of representations received: **29**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

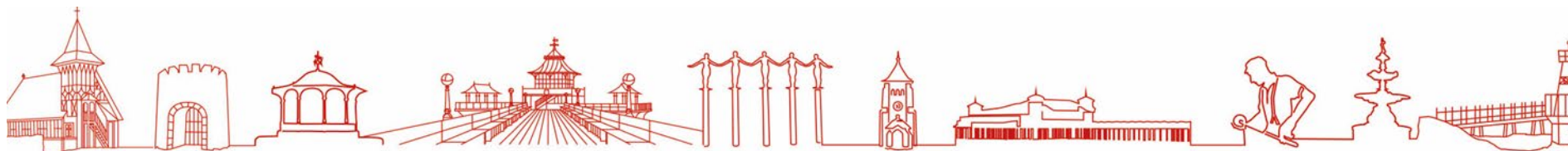
Yes: **6** No: **16** Unsure: **0** No answer: **7**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **3** No: **5** Unsure: **2** No answer: **19**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **3** No: **5** Unsure: **2** No answer: **19**

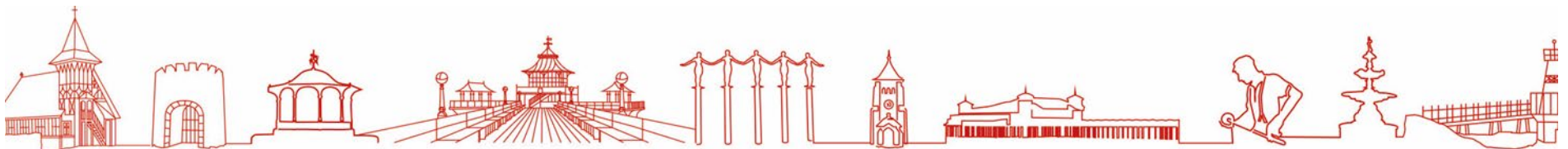


Main issues raised:

- It would not be appropriate for every development to meet every criterion.
- Reconsider the need for a future SPD as detail should be contained within the policy.
- Will an SPD include protecting farming, food production and food security?
- The requirements to 'protect existing ... green and blue infrastructure including peatlands, wetlands and woodlands' and 'protect existing ... biodiversity' should be removed. Requirements do not take into consideration the quality of existing green/blue infrastructure and biodiversity features or the principle of mitigating e.g. it may be that a higher percentage of biodiversity net gain could be achieved through the removal of existing poor quality habitats and the provision of new high quality habitats.
- Reference to SuDS should be included within the policy.
- Need to reword policy to avoid any areas of potential conflict with other policy.
- Consideration should be given to adopt the standards set out in RIBA 2030 project in respect of the promotion of water efficiency measures.
- Concerned that the majority of climate change provisions are covered through adoption of Part O of building regulations, so the policy needs to be worded in such a manner to avoid any areas of potential conflict.
- Green measures such as solar PV, rainwater butts, thermal insulation, recycled building material, energy saving measures should be included and mandated by building codes.

Support/other comments:

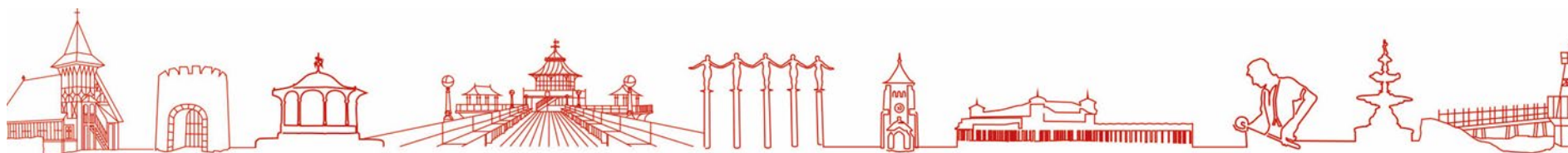
- Most support for the requirements and the need to prepare a climate change adaptation statement. Specific support for inclusion of water and wastewater management. There is support for amendments to the previous version of the policy.

DP6: Net zero construction**Level of response to this policy:**

Number of representations received: 51
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 5 No: 40 Unsure: 0 No answer: 6
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 7 No: 14 Unsure: 10 No answer: 20
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 3 No: 19 Unsure: 7 No answer: 22

Main issues raised:

- Concerns that the policy is not consistent with national policy and onerous requirements could affect deliverability, viability and stifle the supply of affordable homes. Recommended that the policy is updated to reflect the requirements of the Future Homes Standard and the Written Ministerial Statement 2023. Amend to remove requirement for development that goes beyond building regulations and the FHS, replace with 'supportive of'. The policy does not mention the FHS. Policy does not set out any circumstances to allow deviation from national policy. Where local standards are retained, wording should be amended so policy can be applied flexibly.
- Concerns about underestimation within the viability assessment - for both residential and non-residential and renewable energy offsetting.
- Cost of offsetting is not accounted for in the viability assessment. Should allow developers to develop their own offset fund. The word 'elsewhere' in the Renewable Energy Offsetting to be defined further to avoid uncertainty. Requirement to offset emissions from unregulated energy should be removed. Consider widening the potential use of the offset fund to include NHS properties.
- Inappropriate to require every development to meet every criterion.
- It is considered that any targets should be restricted to regulated energy only.
- It is unreasonable to ask larger developments (50+) to provide embodied carbon assessments.
- Need to consider how this will be monitored and what the implications are for the preparation of any assessment.
- Concerns around the suitability of the application of the LETI energy use intensity targets and space heating demand standards outside of a high-density urban setting.
- Question if a policy limiting water use to 100 litres per day is deliverable, or indeed desirable. Include a water efficiency target for non-residential development.



- Can net zero be achieved without affecting our food security?
- The SPD should be made available now.
- Include reference to FHS/FBS when referring to heat networks.
- Requirement for 5 years post completion energy use reports for non-residential developments should be removed.
- Need to provide a transitional period to give the industry time to adjust to the requirements and for the supply chain to be updated or amended as required.
- Suggested wording: new homes must be built to highest environmental standards, high levels of insulation, max use of solar panels, heat pumps and district heating systems and no gas boilers. Consideration to communal microgrids with battery storage.

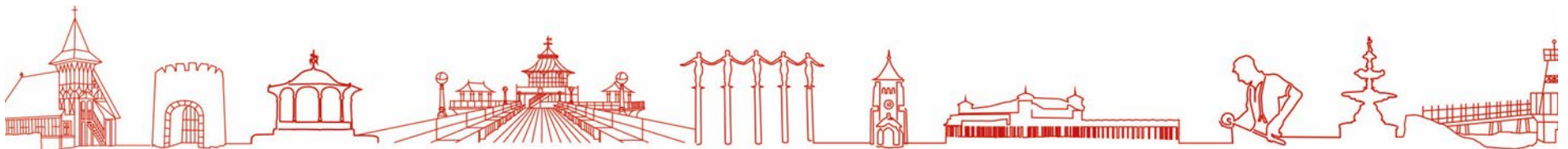
Support/other comments:

- Support the move away from fossil fuel-based systems in favour of low carbon systems e.g. heat pumps. Support the need to assess and reduce embodied carbon of new development, although information isn't available until detailed design stage, so amend wording to require this at reserved matters stage.
- Welcome the opportunity to use BREEAM as an alternative compliance route for non-domestic developments.
- The technology for zero carbon buildings exists and is affordable, but to build the market for it, new build must lead the way. This will also provide homes that are affordable to heat in the face of the energy crisis.

DP7: Large scale renewable and low carbon energy generation

Level of response to this policy:

Number of representations received: 16
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 3 No: 6 Unsure: 1 No answer: 6
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 3 No: 2 Unsure: 4 No answer: 7



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **3** No: **2** Unsure: **4** No answer: **7**

Main issues raised:

- More focus on tidal lagoons and solar on domestic and commercial buildings. Realistically opportunities for large scale wind turbines and photovoltaic projects are limited, wind turbines along estuary perhaps. Extensive hardstanding areas for car imports around Portbury and existing buildings are a good example of where large scale solar could be deployed.
- Policy should encourage roof tops as a priority over greenfield land.
- Unclear why the 'Local Plan 2038 Renewable Search Areas' are no longer identified on the latest version of policies map.
- Needs of communities within adjoining local authority areas should be considered.
- Should reflect need to apply a balanced judgement between energy security and food security. Protection is required for land currently used for food production. Should include a presumption against development of large-scale solar panel installations on grade 1 and 2 farmland and biomass should not replace land used for food production.
- Need to reconsider the use of the term 'unacceptable impact on' – what constitutes unacceptable?

DP8: Efficient use of land

Level of response to this policy:

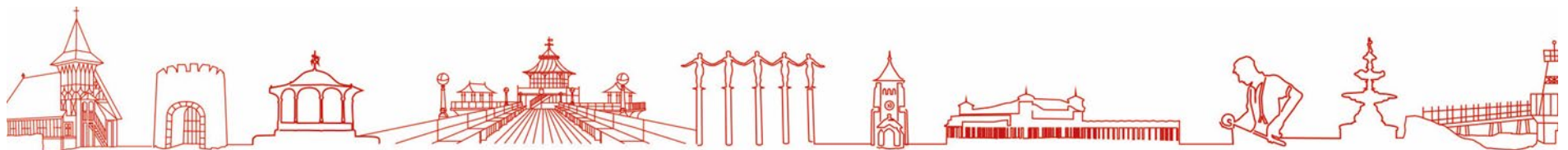
Number of representations received: **29**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **3** No: **22** Unsure: **0** No answer: **4**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **1** No: **9** Unsure: **6** No answer: **13**



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **2** No: **8** Unsure: **6** No answer: **29**

Main issues raised:

- The focus for development should be urban areas such as central Weston-super-Mare.
- The policy identifies a minimum density target of 40 dwellings per hectare and this is too strict and too dense.
- There are conflicts between this policy and SP4 which requires development to 'reflect, protect or enhance local character', DP1 which seeks to ensure density is appropriate and the new Biodiversity Net Gain requirements.
- The policy text should clarify what is an accessible location.
- Suggestion that the policy should refer to net densities to better take account of net developable areas.
- It is noted that the supporting text clarifies that 40 dwellings per hectare is the target average density but this is not specified in the policy wording, which refers to a minimum. This is contradictory.

DP9: Flood Risk

Level of response to this policy:

Number of representations received: **11**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

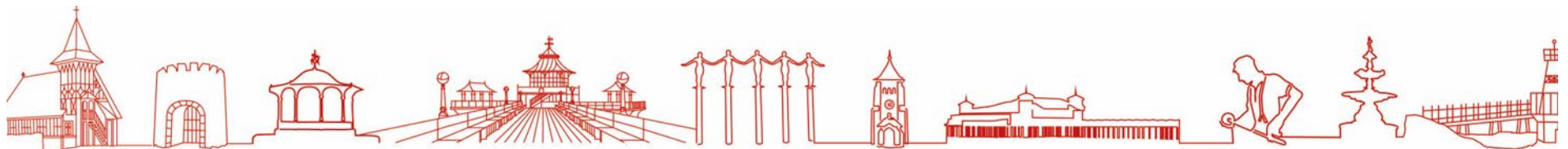
Yes: **3** No: **8** Unsure: **0** No answer: **0**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **3** No: **2** Unsure: **3** No answer: **3**

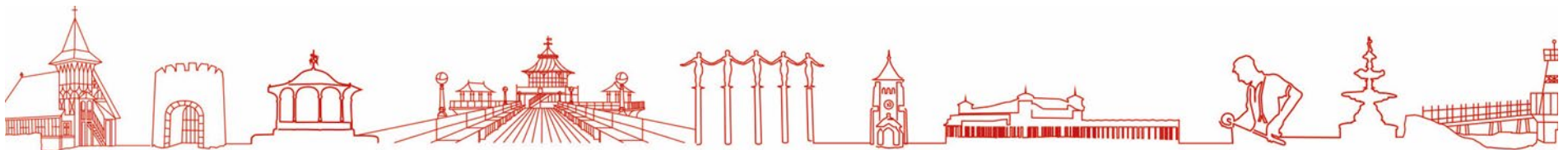
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **11** No: **3** Unsure: **3** No answer: **3**



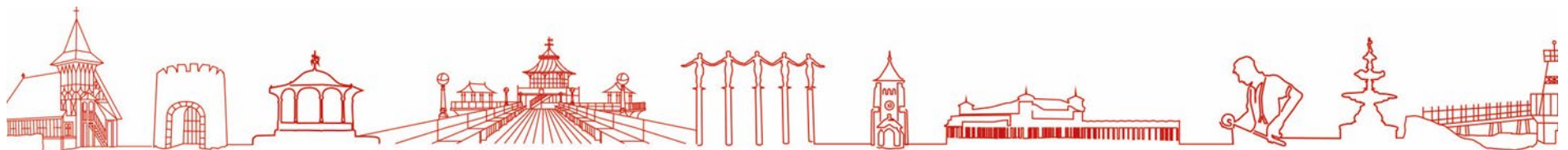
Main issues raised:

- The policy should expressly allow for a disaggregated approach when considering the need for the sequential test, which would facilitate development sites being brought forward where residential development is not proposed to take place in the areas at risk of flooding but other elements of the development – infrastructure/biodiversity/open space etc may be within the red line of an application). This would reflect a sequential approach and meet the national policy aim of preventing inappropriate development in areas of flood risk.
- The assessment of alternatives relevant to the sequential test, and given the overall spatial strategy of the plan, it is considered that it would only be relevant to consider alternatives at sites within or adjacent to settlements of an equal order in the settlement hierarchy, or above, to reflect the wider approach to sustainable development (providing a greater focus, and pragmatic approach, to the suggested approach of looking across the whole district irrespective of the spatial strategy).
- The decision to restrict the area of search to a main town in certain circumstances is understood. However, in its current form the wording of the requirement is too restrictive as it means that the area of search for an application outside but directly adjacent to a main town would be the entire district. This is not proportionate as sites that are directly adjacent to the settlement boundary of the main towns will clearly relate to those settlements.
- North Somerset Council has published no supporting evidence to demonstrate that all proposed allocation sites within Schedule 1 of the Pre-Submission Plan to have been reviewed and, where required, subjected to a Sequential Test taking into account all sources of flood risk as set out within NPPF. The Pre-Submission Plan is not justified and consequently not sound until the Sequential Test is fully addressed.
- There is no mention of the risk of flooding from sewers already at capacity, nor surface water flooding caused by more impermeable surfaces, nor seeking the provision of additional/extended infrastructure like new sewers and water treatment facilities. Nor is there mention of the need to create a wetlands area to sustainably take run-off water and protect the Sites of Special Scientific Interest to the north of Nailsea around the Causeway.
- The draft policy suffers from the plan's consistent lack of clarity around the 'main towns' in terms of which towns they are; and for what reasons they fall under that category. The policy states that where sites required to undergo the Sequential Test are within the 'main towns', the search area should be limited to the same town. This part of the policy does not work in practice as there is no definition of what the main towns are.
- Policy states development proposals for less than 10 dwellings within the settlement boundaries of Weston-super-Mare, Clevedon and Portishead will not be required to provide evidence that they have considered the sequential test. However, flood risk issues for developments in these areas would need to be addressed and should take into account the Council's Strategic Flood Risk



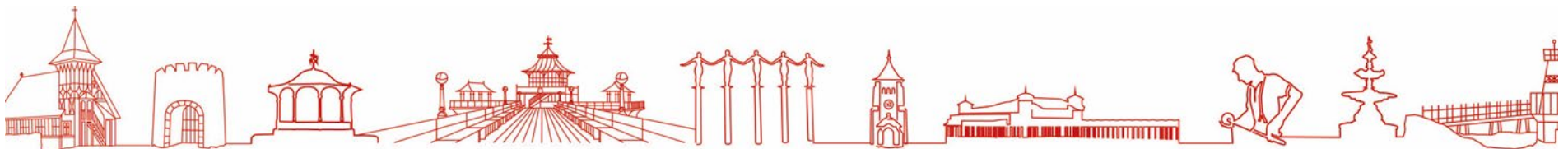
Assessment along with any other flood risk information, as part of any assessment of the proposals, as mentioned in the policy. It is noted that the Sustainability Appraisal agrees with the strategic approach to focus new development to main towns. There are however, locations near to the coast with high flood risk issues which will need to be even more carefully considered and any flood risk issues addressed.

- New development should follow a sequential approach on site and direct the highest vulnerability development away from flood zones. Site specific Flood Risk Assessments (FRAs) should be accompanied by up to date modelling data, including data from the SFRA or the Environment Agency. Residential development must be two storey and not include self-contained accommodation (particularly ground floor) within Flood Zone areas.
- While the ability to carry out the Sequential Test across more focused areas is welcomed, the policy would benefit from clarity as to what these 'catchment areas' refer to.
- With flood risk Sequential Tests, the responsibility in carrying out the test lies with the Local Planning Authority. However, the applicant can submit their own Sequential Test and can challenge the LPA's test. The policy should follow Planning Practice Guidance and refer to a register of reasonably available sites, which should have formed part of the evidence base for this plan, and must have been used for the Council to sequentially test sites with flood risk.
- In the absence of a list of reasonably available site provided by the LPA, it is unclear how the sequential test has been applied effectively in accordance with national guidance which is a concern and could stifle development.
- Flood Risk Sequential Test of Proposals within the Pre-submission Local Plan has been included within the evidence base, but this does not provide an adequate sequential test of the proposed allocations. For example, paragraph 3.8 sets out that 38 other sites at Weston-super-Mare were assessed but these were not considered suitable alternatives to the allocations at Weston-super-Mare. However, the actual assessment of those alternatives is not provided so it is impossible to determine how these sites were considered. Without evidence of a robust sequential test, it follows that there may be serious issues of soundness with those allocations with repercussions across the plan as a whole.
- The Policy does not address the fact any rollover allocation is sensibly required to be sequentially tested again. PPG is clear in its guidance that rollover allocations should be sequentially tested if there has been a change in the known level of flood risk since the initial allocation was adopted. Since the Council's Site Allocations Plan was adopted in 2018, the Woodspring Bay Model for tidal flooding has been issued and is the latest Environment Agency flood model for North Somerset. It is used by North Somerset Council to inform the determination of planning applications. The projected flood depths of this model are greater than those in the previously used Congresbury Yeo Model. The flood risk context for each rollover allocation has therefore changed since the initial allocations, which used the Congresbury Yeo model.



- Within Flood Risk Sequential Test of proposals within the Pre-submission Local Plan it is detailed that the sequential tests for the draft allocations have been carried out using the National Flood Map. Additionally, the adopted allocations have not been sequentially tested, which does not comply with PPG. At the planning application stage, the Council has routinely asked applicants to use the Woodspring Bay model over the last 18 months, so it is unclear why it is acceptable to use the National Flood Model at the plan-making stage, when more recent and localised data is available.
- The draft Policy should reflect the decision making of recent Secretary of State decisions, namely that of the Silverthorne Lane, Bristol planning appeal from 2022. In this decision, the Secretary of State stated that in the long term flood defences should be assumed to be maintained and upgraded, unless there is evidence to suggest otherwise. Draft Policy DP9 should be amended to reflect this decision and ensure it is considered in the decision making process in North Somerset.
- There is currently a judicial review pending on the dismissal of two planning appeals in relation to the Planning Inspectors' interpretation of national policy and guidance on the flood risk sequential test. While the court judgement is still outstanding, it is premature for the Council to progress this draft Local Plan with a policy that is inherently linked to that judicial review. The outcome of the judicial review will establish how national policy and guidance on sequential testing should be interpreted and this may well lead to draft Policy DP9 needing to be revised. While unknown at present, the outcome could impact the wider spatial strategy for North Somerset and therefore the Council should put this Plan on hold, while the judicial review is determined.
- Policy which is far too detailed and does not reflect national policy.
- Accept that any future applications on the northern most part of Locking Parklands which falls within an area of flood risk (with defences) will need to consider the criteria as set out. This site like the majority of Weston-super-Mare is within the same flood risk area and benefits from significant flood defences. It is also previously developed land within the main settlement, and sustainably located. Furthermore, the development can be made safe as per all other developments within this zone within Weston-super-Mare through setting appropriate finished floor levels and site levels for this area as agreed with the Environment Agency and providing appropriate means of potential escape in an extreme event. This situation is common to the majority of the urban area of Weston-super-Mare and exemplified by the adjoining land to the north that is being developed by Keepmoat for example. Furthermore, the site already benefits from allocation (in line with the NPPF) and planning permission, and can be suitably accommodated by the 'super pond'.
- Policy wording should clarify that development proposals will not require the submission of a flood risk sequential test where the site has already been allocated for development in line with paragraph 168 of the NPPF. This could also be included on the site requirements listed in Schedule 1 for allocated sites such as Parklands Villages.

Support/other comments:



- Lack of sustainable alternatives to meeting housing needs (in line with spatial strategy) outside of areas at greater risk of flooding. It is essential that the approach to the sequential test, as set out in policy DP9, is consistent with national guidance and provides a positive and pragmatic approach.
- Developments must be accompanied by robust flood warning and evacuation plans, including safe refuge areas which are adequately sized for the development and suitable for the building's occupants. This must be agreed in conjunction with the Local Planning Authority's Emergency Planners.

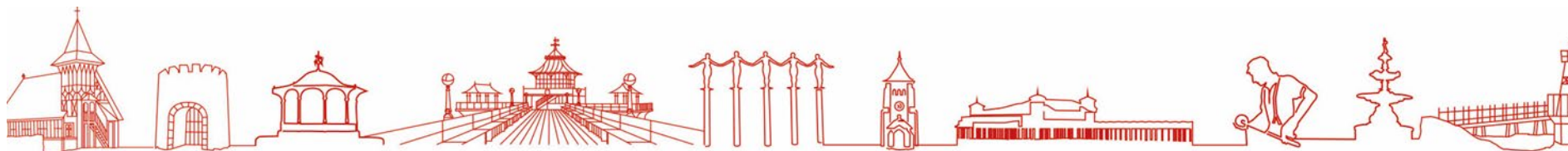
DP10: Sustainable Drainage

Level of response to this policy:

Number of representations received: 5
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 3 No: 1 Unsure: 0 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 2 No: 0 Unsure: 1 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 0 Unsure: 1 No answer: 3

Main issues raised:

- Policy DP10 refers to specific guidelines within the policy working, in this case SUDS Manual (CIRIA C753). As such, the policy does not provide sufficient flexibility to respond to updated national guidance over the lifetime of the plan. To ensure the policy remains up to date, it is suggested that reference to any additional policy which may supersede guidance specifically quoted in the policy, is included within the policy wording itself.



- There is no mention of the need to create a wetlands area to sustainably take run-off water and protect the Sites of Special Scientific Interest to the north of Nailsea around the Causeway.

Support/other comments:

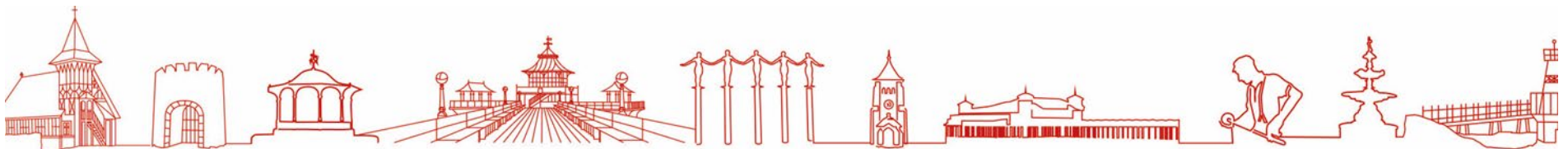
- Welcome the positive messages on water as a resource. SuDS can be an important part of water storage and slowing the flow. This will help to maintain flow in streams and rivers and other water features during dry weather.
- Huge housing development on Weston Airfield, what happens to the water that used to collect on this area? Rewrite required to incorporate emergency plans and actions.
- Support policy which identifies that in line with the Government's Storm Overflows Discharge Reduction Plan that water is seen as a resource and is re-used where practical, offsetting portable water demand.

DP11: Rivers, watercourses and springs

Level of response to this policy:

Number of representations received: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 2 No: 0 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 0 Unsure: 0 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 0 Unsure: 0 No answer: 1

Main issues raised:



- Recommend the requirement for 'the continuity of flows from springs must be managed and maintained' should be extended to protect flows in headwater streams and rivers, as well as ensuring no increased flood risk and water quality issues.

Support/other comments:

- Welcome that this policy promotes ecological protection and enhancement of waterbodies to be considered when proposing new developments and aligns with daylighting culverts and Water Framework Directive objectives.
- Protection and enhancement of all existing water features, and the potential to create new ones, should be part of all development. Many water features will be protected for conservation such as Grumplepill Rhyne that is located within the Wolverhill proposed development. Groundwater issues should also be included as part of this policy.

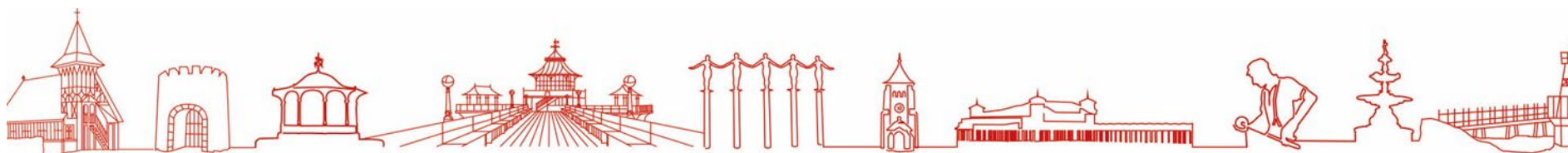
DP12: Development in the Green Belt

Level of response to this policy:

Number of representations received: 11
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 1 No: 8 Unsure: 0 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 2 No: 1 Unsure: 5 No answer: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 1 Unsure: 6 No answer: 3

Main issues raised:

- Churchill Parish Council feels that the protection of Green Belt to prevent urban sprawl has taken priority over ensuring the sustainability of thriving rural communities surrounded by good agricultural land. Churchill Parish Council suggests that houses



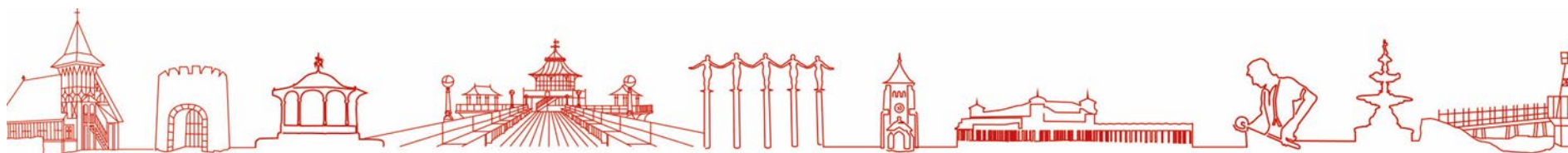
should be built within 10 minutes walking distance of railway stations and close to centres of employment where the relevant infrastructure exists.

- The section 'Facilities for outdoor activities' should allow for locations for sport serving Nailsea.
- DP12 should include limited infilling and reuse of PDL as set out in the NPPF.
- The area around Bishopsworth, Yanley and Ashton Vale should be removed from the Green Belt as a site to be allocated for affordable homes mixed development as it is well served by the public transport network and could be developed as part of a metro bus system and light rail system to Bristol Temple meads station city centre, South Bristol and the Airport.
- There is concern that these revisions, coupled with the lack of Green Belt release in North Somerset, will inhibit the delivery of affordable housing where needed. There is a significant housing need in North Somerset and the Local Plan should enable development on appropriate Green Belt sites to help meet this acute need.
- The proposed amendment to draft Policy DP12 is as follows: Proposals for development in the Green Belt will be determined in accordance with national policy. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The construction of new buildings shall be regarded as inappropriate development. Exceptions to this are set out in the NPPF.

DP14: Highway safety, traffic and provision of infrastructure associated with development.

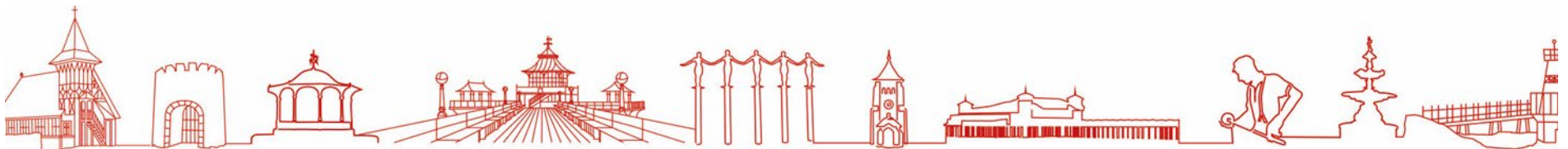
Level of response to this policy:

Number of representations received: 17
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 5 No: 7 Unsure: 1 No answer: 4
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 3 No: 3 Unsure: 5 No answer: 6
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 3 No: 2 Unsure: 6 No answer: 6



Main issues raised:

- The Local Plan does not deliver highway infrastructure improvements in a timely manner and will result in increased congestion and traffic jams. The existing highway network is already inadequate. The increase in housing will exacerbate existing issues.
- The Local Plan does not account for the cumulative impact as a result of additional housing and associated infrastructure.
- DP14 is too ambiguous and therefore non-compliant with the NPPF. The wording of the policy needs clarity in terms of what is regarded to be 'severe impact' and how is this measured?
- No mitigation has been presented to offset increased congestion on the A370 through Flax Bourton. Development should not continue along the A370 whilst the relief road from Nailsea and Backwell Station to the A370 is deemed undeliverable. The absence of a completed Transport Plan, Infrastructure Delivery Plan and the lack of proper consultation with Network Rail and Train Operating Companies.
- The plan does not advise on how it will reduce congestion of A369, improve safety of road users at Leigh Woods, enforcement of cyclists using the cycle lane, encourage active travel or prioritise rail use. Too much responsibility is placed on developers rather than the local authority.
- Are the mitigation measures associated with works to the M5 or strategic highway network itself, public transport measures to improve accessibility by those modes, or other actions? The requirement, timing and delivery of mitigation measures could have a direct impact on the delivery of development within the plan. Such works will need to be appropriately referenced within the Infrastructure Delivery Plan.
- The approach adopted is based on out-dated models of assessment, that is, it is very much a 'Predict and Provide' model rather than a 'Vision and Validate' approach. It is apparent that the application of this policy will lead to new development being required to provide for new road space and will lead to increases in commuting traffic. The supporting text in that it notes that developments may be required to contribute to funding the improvement of rail freight facilities, even where they are no direct benefits. This raises the question as to how these contributions will be measured or policed, and the level of contributions that are to be made. Whilst this is a laudable aspiration, it is not considered that this can be practically implemented and does not meet the tests for planning obligations as set out in NPPF. The supporting text notes that proposals that reduce out-commuting from North Somerset, especially Weston-super-Mare, will have a beneficial effect on the overall level of congestion by reducing traffic on the M5, which will need to be balanced against any detrimental local effect.



- A Tickenham and Nailsea bypass link from A370 to J20 of the M5 would improve traffic flow, improve safety and people's lives in Nailsea, Tickenham and some of Backwell and provide a link to the airport and should be included in the plan.
- National Highways suggests revising the supporting text from 'proposals with a significant impact on the M5' to 'proposals with the potential to adversely affect the safe operation of the M5'. The sixth paragraph of the supporting text refers to improvements and measures sufficient to 'maintain overall road traffic at the otherwise expected level' but it is not clear how this level is to be set or calculated. Clarification is requested.

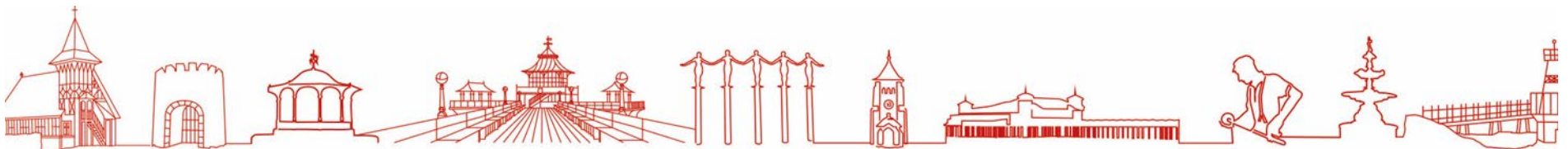
DP15: Active and sustainable transport

Level of response to this policy:

Number of representations received: 16
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 3 No: 10 Unsure: 2 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 5 No: 2 Unsure: 5 No answer: 4
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 3 No: 2 Unsure: 6 No answer: 5

Main issues raised:

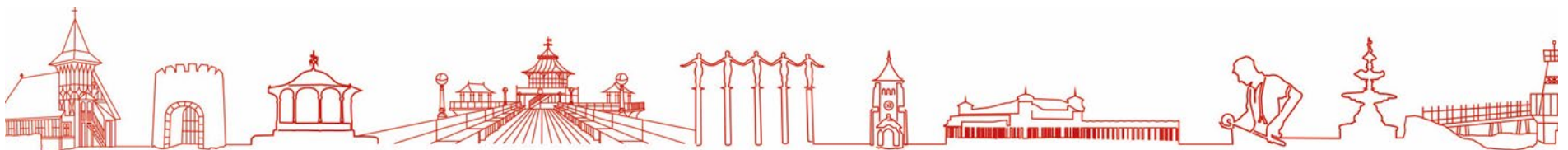
- The needs of a resident determines the mode of transport rather than the design of a development. DP15 is therefore flawed.
- Concern regarding the impact on the B3128 and B3130, particularly on the village of Wraxall, the roads around the Failand triangle and the notable areas of congestion at Portbury Lane and Wraxall Hill, north of Nailsea and the B3130
- There should be stronger emphasis on use of active travel and the local authority should take on more responsibility to ensure it is implemented.
- There is not enough infrastructure proposed within the local plan to support active travel and sustainable transport aspirations.



- The Highways Design Guide (2020) imposes arbitrary 5.5m standard minimum carriageway widths for local access and minor access roads which further enhances the status of the car above sustainable modes. This is at odds with Manual for Streets 1 and 2. It undermines ability to design for active travel and lower vehicle speeds and prioritises design for bin lorries. The Council's Parking Standards Supplementary Planning Document (November 2021) overprovides for car parking and sometimes unnecessarily prioritises parking over sound design which is seeking to create a sense of place and limit car parking provision.
- Developments more than a mile from town centres are unlikely to get much use from active travel or sustainable transport use.
- Land at Failand and associated development on site would provide improvements to active and sustainable transport networks and would be a significant benefit for the local community, encouraging active travel modes into Bristol and nearby towns and villages.
- How have carbon targets had been agreed and what are the repercussions were if the agreed targets had not been met?
- The development allocations contained in the draft Local Plan do not maximise the opportunities to realise this principle through the allocation of available sites in proximity of public transport hubs and train stations. Allocation of Land East of Flax Bourton and land east of Backwell for residential led mixed use development would realise the policy's aspirations in a location where opportunities to make walking, cycling and public transport, including train travel, the preferred choice over the private car.
- Policy should be strengthened to act against commuting by car. For this purpose, a bullet point should be added along the lines of (Development will be supported where:) 'existing census data shows that average commuting distances from the settlement is less than 8km'.
- Include references within the policy which seek to allow the practical implementation of Policy DP15 and to also state that where proposals comply with Manual for Streets and evidence through tracking and Road Safety Audits that they are safe, then roads will be adopted by the Council.
- The extent to which a 10% reduction in trip rates is mandatory on all new developments requires greater explanation within the Local Plan and relevant policies, specifically DP15. Further explanation is also needed to clarify the level of contributions sought towards active/sustainable transport strategies in circumstances where specific development proposals support trip reduction levels at or in excess of the 10% outline within the Stage 7 Interim Transport Assessment.

Support/other comments:

- The recognition of 'the effect of additional traffic on the surrounding road system must be taken into account such as where development introduces traffic of excessive volume, size or weight into a network of country lanes, or residential areas' in the justification is welcome and this policy is strongly supported.



- The EA supports this policy, which encourages sustainable travel and transport options.

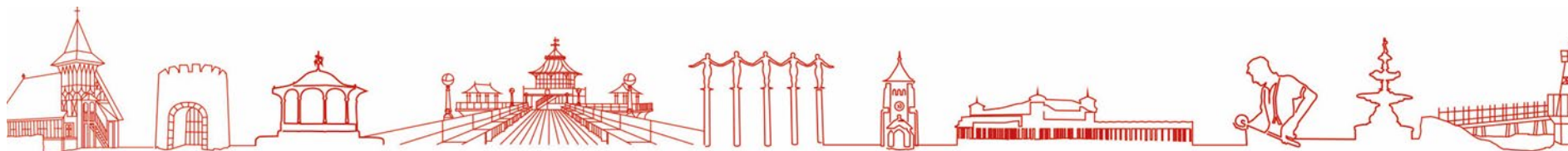
DP16: Active travel routes

Level of response to this policy:

Number of representations received: 9			
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?			
Yes: 1	No: 5	Unsure: 1	No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?			
Yes: 1	No: 0	Unsure: 5	No answer: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?			
Yes: 1	No: 1	Unsure: 4	No answer: 3

Main issues raised:

- Policy DP16 is not justified as no mention is made that routes must be of adequate size to accommodate the expected increase of users and that the active travel routes must also be well aligned to allow speedy safe travel.
- The plan should include further active travel routes, for example there should be one linking Backwell to Yatton.
- The Causeway between Nailsea and Tickenham has been suggested for conversion to an Active Travel Route on several occasions. It will form part of an all weather link between Nailsea and Tickenham, providing better access to Cadbury Camp, an Iron Age hill fort, which provides breathtaking views.
- Support the inclusion of active travel routes within Locking Parklands shown on the Policies Map and will seek to integrate them into the development. However, their alignment needs to consider the general arrangement of the Spine Road, existing features on the site and levels amongst other considerations.



- The final section of the active travel route from Brean to Weston, Clevedon, and finally Portishead, linking the coastal towns should be prioritised by the Council.

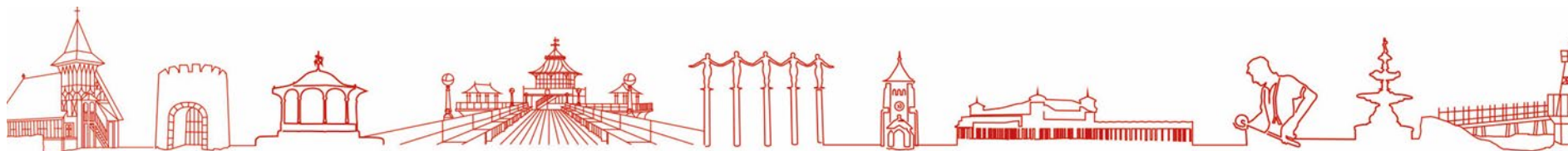
DP17: Public transport accessibility

Level of response to this policy:

Number of representations received: 12
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 3 No: 7 Unsure: 0 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 5 No: 1 Unsure: 3 No answer: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 4 No: 1 Unsure: 3 No answer: 4

Main issues raised:

- The closure of access from Dark Lane, Backwell to the A370 will have a terrible impact on traffic in Church Lane (both directions) and at each end there is no traffic-controlled access to the A370.
- In order to encourage people to use buses they must run frequently irrespective of how many people live in an area. It is not right to believe that people living in less densely populated areas will be prepared to wait longer than those in more densely populated areas. Those in the less populated areas will simply use their private means of transport rather than wait for a long time for a bus.
- The aspiration of this policy will not come about without investment into better bus routes and a more frequent service.
- The main development corridor from Weston-super-Mare bus and coach station to Locking, Banwell, Wolverhill, Sandford and Winscombe is at present every 2 hours. There are concerns about the sustainability of these locations without a private car unless bus service are improved to Metro bus standards.



- A main concern is that the delivery of services, whether these are new or enhanced services, will be dependent upon the commercial realities of the public transport provider.
- Yatton and Claverham should be a primary goal of the Local Plan. Part of this should include the provision of local electric minibuses within local communities so that people with restricted mobility do not become isolated.
- Provide buses at a minimum of 15-minute intervals at a competitive price e.g. current £2 maximum. The buses must run throughout the day to service everyone from early commuters, through shoppers and day leisure travellers to commuters and evening social journeys both early and late.
- The words 'within a reasonable distance' are too vague and ambiguous.

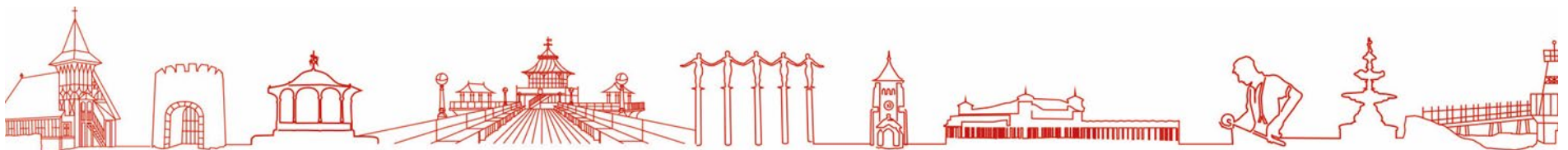
DP18: Travel plans

Level of response to this policy:

Number of representations received: 7
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 0 No: 5 Unsure: 1 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 3 No: 1 Unsure: 2 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 1 Unsure: 4 No answer: 1

Main issues raised:

- This policy should be more specific about what constitutes 'significant amounts of movement'.
- It may be that travel plans are effective in some areas. However, to long term residents of Nailsea, where there is an ingrained car culture, they appear purely aspirational, serving only to enable inappropriate development.



- The plan to place the SEMH School at the bottom of Ladymead Lane Langford will cause further congestion in this very narrow and unsuitable location and should be located elsewhere. Insufficient consideration appears to have been given to the likely traffic congestion that seems inevitable with the proposed site allocations in Churchill and, in particular, around Pudding Pie Lane, Jubilee Lane and Ladymead Lane.
- Travel Plans will likely rely on the use of active travel, but new developments will likely rely on private car ownership. This is likely to result in further congestion and overcrowding.

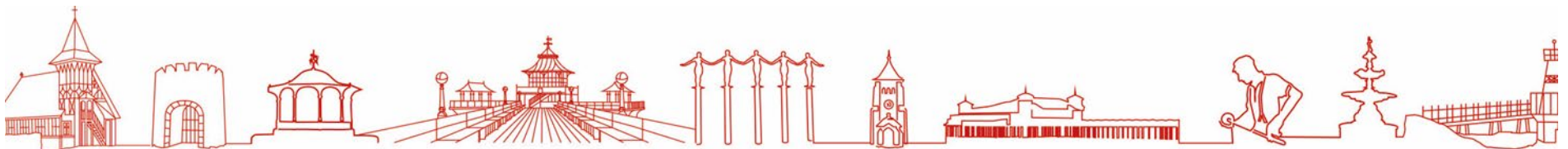
DP19: Parking

Level of response to this policy:

Number of representations received: 9
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 2 No: 5 Unsure: 1 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 2 No: 0 Unsure: 4 No answer: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 0 No: 0 Unsure: 6 No answer: 3

Main issues raised:

- 'Alternatives to the private car are easily accessible, widely available and offer residents an attractive alternative to reliance on private vehicles, particularly for local trips.' This statement is not agreed with. Car parking reductions not justified.
- Provision for EV charging should be included in the policy.
- The policy lacks aspirations for P&R for Long Ashton and Weston-super-Mare.



- Objection is raised to this policy as the required parking standards should be included within the text. A mechanism for amending the standards (should that be necessary in the future) should also be included.
- The policy notes support for developments with reduced provision for parking in highly accessible locations, well integrated into the existing settlement with easy and direct access to local facilities via active modes of travel. It notes that such developments must be well served by public transport and should have access to a car club vehicle. The later compulsory requirement of Policy DP19 may be inappropriate in certain circumstances and therefore shouldn't be obligatory.

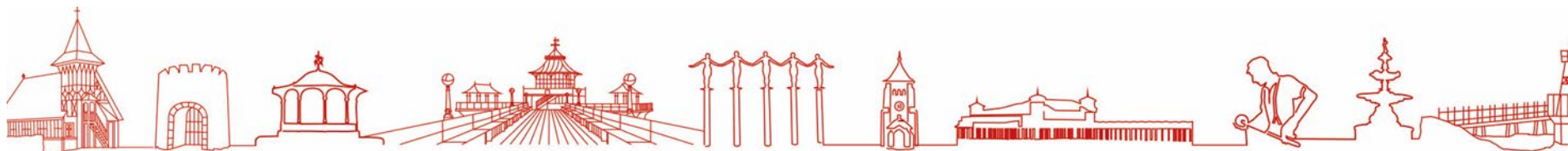
DP20: Airport related car parking

Level of response to this policy:

Number of representations received: 6
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 0 No: 3 Unsure: 1 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 1 Unsure: 2 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 0 Unsure: 3 No answer: 2

Main issues raised:

- The Local Plan policy should not depend on an ASAS which does not exist or not allow for public consultation.
- This policy is not sound because:
 1. It will create a near monopoly of airport-related car parking for Bristol Airport, which removes competition and is unhealthy for the wider local economy of North Somerset, with cost implications for airport customers.
 2. Will inevitably require further incursion by the Airport into the Green Belt, as already proposed by increasing the Green Belt inset in Policy LP9.



3. The knock-on effect will inevitably be to further add to the current amount of unauthorised and 'rogue' airport parking on lanes and in the rural countryside around the Airport, with all the consequent visual, traffic and noise disturbance inflicted on the local community.

4. This increase in unauthorised airport car parking will add further to the excessive workload of the North Somerset Council Planning Enforcement department, which is already clearly unable to cope with the constant planning cases of airport related parking contraventions. This will require further NSC staff investment at a time when the Council is struggling to reduce costs.

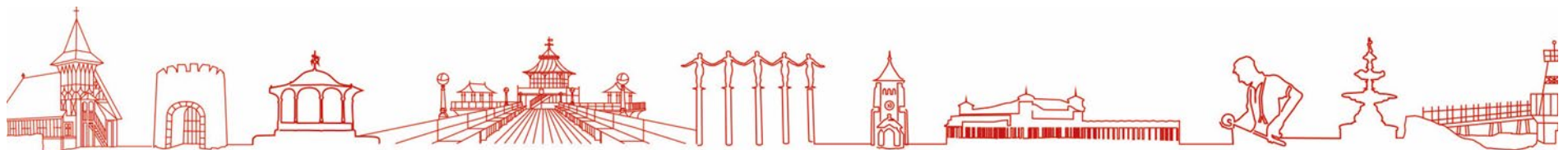
5. The issue of airport car parking is one of the most important - and complex - issues affecting surrounding local communities, and has been raised many times. Before any local plan policy is finalised, there is a clear need for adoption of a Supplementary Planning Document to thoroughly consider this issue and its ramifications.

- Policy DP20 fails to recognise that the principle of airport related car parking has been established on land that is outside the Bristol Airport boundary as defined on the Policies Map. The extension of the Silver Zone car park (as consented under the 12 mppa planning permission) and land north of the runway to accommodate longer-term development to circa 15mppa should be included within the Airport boundary/Green Belt Inset.
- National Highways requests that the policy is amended to additionally reference proposals only being supported where they do not result in severe residual cumulative traffic impacts, particularly during peak periods and/or do not create a significant constraint to the delivery of any planned improvements to the transport network or allocated sites.

DP21: Safeguarded employment sites

Level of response to this policy:

Number of representations received: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 1 No: 2 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 0 Unsure: 1 No answer: 1



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **1** No: **0** Unsure: **1** No answer: **1**

Main issues raised:

- The recent changes to former B1 uses to new E Class are discussed. Any potential for self contained ground floor residential development, as a result of this use class, would need to be carefully assessed where the site is in a flood zone 2 or 3. This is due to the potential increase in flood risk issues associated with any change to residential development.
- No reference to farming.
- Draft Policy DP21 seeks to safeguard employment sites other than those allocated for other purposes. On this basis and by definition this policy should not apply to the Wyndham Way Development Area. The wording of the policy should be amended to provide further clarity as follows: 'Unless allocated for other purposes in the Local Plan, as identified in Policy LP2, the Policies Map and in Schedules 1 and 2, on land with existing or proposed employment uses (Use Classes B2, B8 and E(g)) proposals for other uses will only be permitted where it can be demonstrated that'

DP22: Visitor attractions

Level of response to this policy:

Number of representations received: **5**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

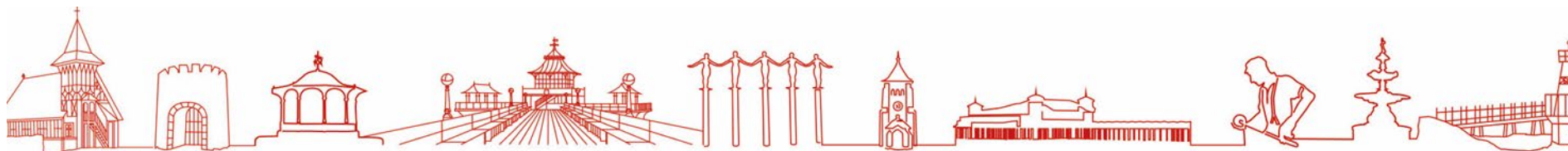
Yes: **0** No: **4** Unsure: **0** No answer: **1**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **0** No: **2** Unsure: **2** No answer: **1**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **0** No: **2** Unsure: **2** No answer: **1**



Main issues raised:

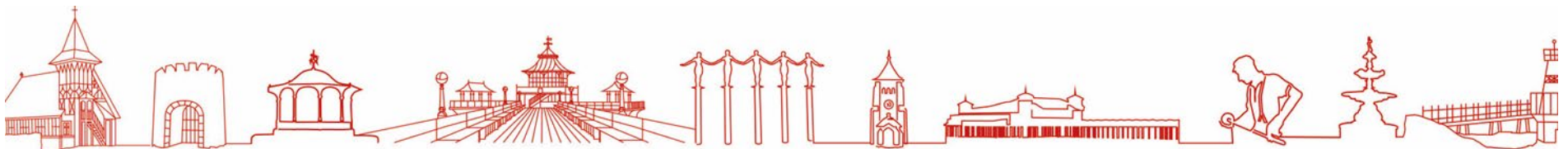
- Amend wording from 'no adverse impact' to 'no unacceptable impacts to more closely align with NPPF.
- Want to see stronger Green Travel plans for visitor attractions when development takes place including contributions to local bus services improvements.
- Will current or increased levels of food production be guaranteed or reduced by these policies? How will food production and its variety be protected?

DP23: Visitor accommodation**Level of response to this policy:**

Number of representations received: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 1 No: 1 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 0 Unsure: 1 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 0 Unsure: 1 No answer: 0

Main issues raised:

- Food production and security should also be protected under this policy.
- There appears to be no policy covering air B&B and its potential to create nuisance for neighbouring properties - London and the Lake District may have such policies.



DP24: Town centres

Level of response to this policy:

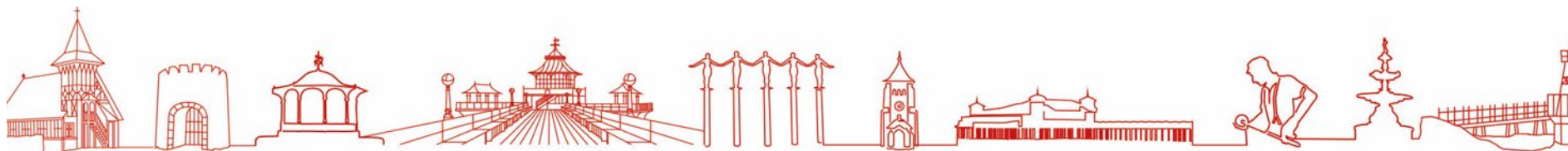
Number of representations received: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 2 No: 1 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 0 Unsure: 1 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 0 Unsure: 1 No answer: 1

Main issues raised:

- NSC does not appear to have learnt lessons from the destruction of Dolphin Square, the ‘carrot’, purchase of Sovereign Centre empty units etc. The plan does not appear to offer a viable and achievable solution/vision.
- Consult with the public and local businesses
- Support proposals to make the presence of any rivers in the towns more visible, such as is mentioned for Clevedon. This should include incorporating buffer strips for nature and greening the river corridor where possible.
- Disappointed not to see reference to the placemaking strategy work that has taken place in Clevedon. The opportunities for sustainable improvements to the Queens Square area should be referenced. Welcome the reference to increasing the visibility of the river in the town centre for its amenity and wildlife value.

DP26: Local centres

Level of response to this policy:



Number of representations received: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 0 No: 0 Unsure: 1 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 0 No: 0 Unsure: 1 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 0 No: 0 Unsure: 1 No answer: 0

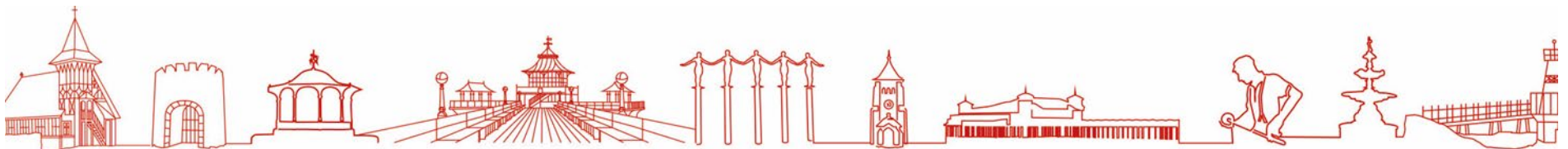
Main issues raised:

- Query the designation of the Backwell local centre as it is currently 50:50 residential and local businesses. There is no longer a post office or bank. Will it have implications for premises which are currently in residential use?

DP30: Control of non mineral development

Level of response to this policy:

Number of representations received: 4
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 4 No: 0 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 3 No: 0 Unsure: 0 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 2 No: 0 Unsure: 0 No answer: 2



Main issues raised:

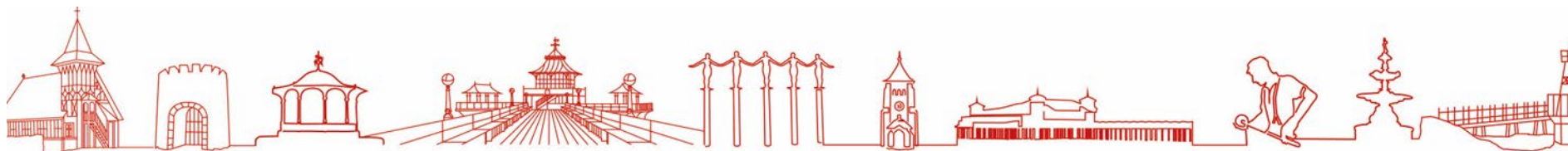
- Minerals can only be worked where they are found and thus it is very important that any non-mineral development is very carefully controlled and only permitted in close proximity where it can be very carefully mitigated.
- Support policy which would be applied in conjunction with Policy LP15 as the MSA covers these areas.
- The policy is important to ensure inappropriate development does not affect mineral operations.
- The buffer zone of 500 metres around mineral operations is appropriate and is supported.

DP31: Mineral working**Level of response to this policy:**

Number of representations received: 6
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 2 No: 3 Unsure: 1 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 2 No: 1 Unsure: 1 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 3 No: 1 Unsure: 0 No answer: 2

Main issues raised:

- Bleadon Parish Council declared the parish of Bleadon to be 'Frack Free' which should be acknowledged in the Local Plan.
- The first criterion should not apply to the areas covered in Policies LP14 and LP15. The supporting text refers to the consideration of the landbank and deliverability of reserves. As Planning Practice Guidance makes clear, 'there is no maximum landbank', and so a landbank of crushed rock reserves above the 10 year minimum should not be a reason for refusal, although 'a landbank below the



minimum level is a strong indicator of urgent need.’ The supporting text should make clear that the allocated areas in Policy LP13 and LP14 would not be subject to the criterion regarding need, as it has been demonstrated in the plan and the justification for the allocations of the Preferred Area and Area of Search. The other criteria also duplicate to some extent those in Policies LP13 and LP14.

Support/other comments:

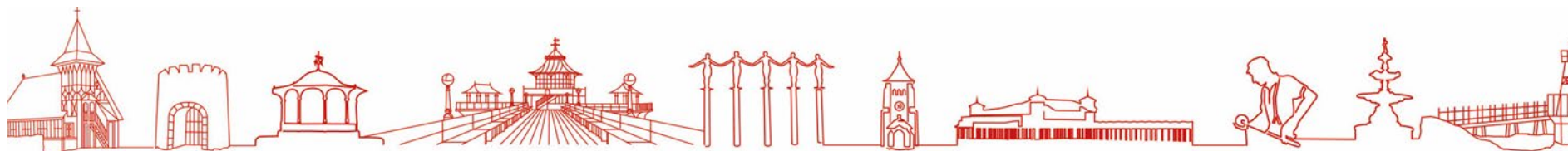
- Support the policy and any mineral extraction that requires groundwater dewatering must be discussed with the Environment Agency at an early stage.
- The policy is necessarily wide ranging and it is important to ensure that unnecessary impacts from mineral operations are avoided.

DP32: Waste management facilities

Level of response to this policy:

Number of representations received: 5
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 0 No: 2 Unsure: 2 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 2 No: 0 Unsure: 3 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 2 No: 0 Unsure: 3 No answer: 0

Main issues raised:



- The policy specifically mentions the relocation of the waste management facility at Backwell. Given that Backwell is also the planned site of two large new housing developments, the removal of this facility would seem contrary to NSC's aim to ensure that new developments are sited near to services so as to reduce car journeys. Residents will be driving long distances to dispose of waste and creating traffic congestion/increasing emissions. Recyclable items will be put in general waste and there will be an increase in fly tipping.
- The waste site in Backwell should be retained, and consideration of the addition of a community composting facility, recycle reuse container that could be staffed by volunteers.

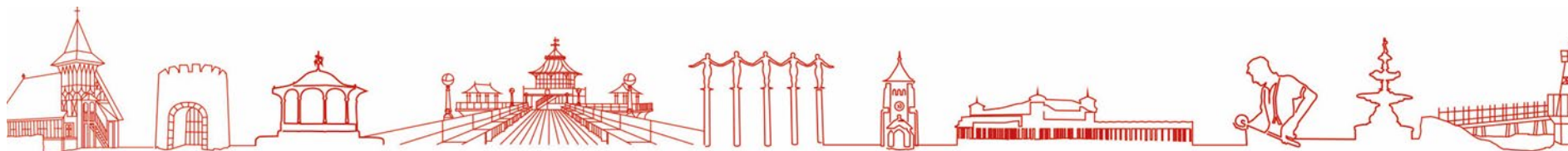
Support/Other comments:

- Relocation of Backwell's existing household waste recycling centre off Church Town and for a replacement waste transfer station in Weston-super-Mare is supported.
- This policy relates to the development of new waste management facilities and encourages the recycling and reuse of waste, which is positive from a climate change perspective.

DP34: Green infrastructure

Level of response to this policy:

Number of representations received: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 0 No: 3 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 0 No: 1 Unsure: 0 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 0 No: 1 Unsure: 0 No answer: 2

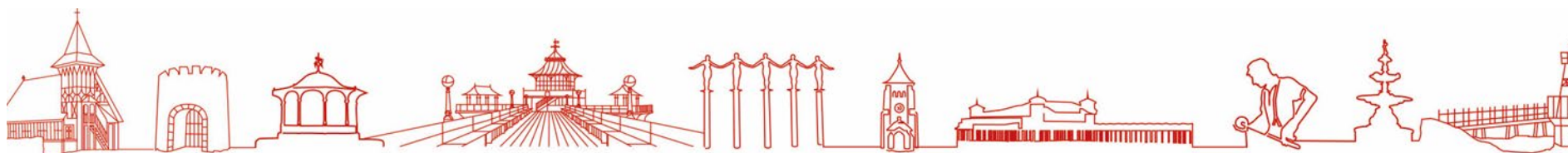


Main issues raised:

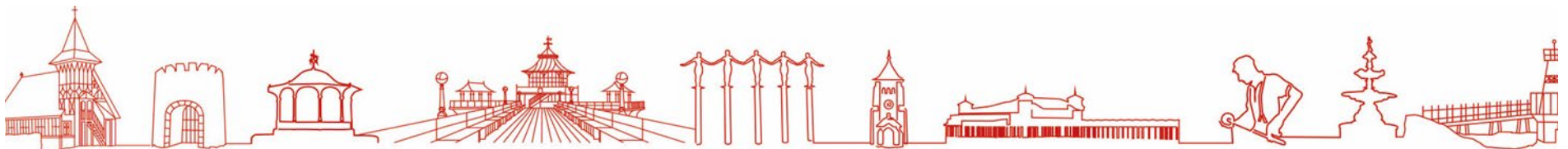
- The policy makes higher requirements for large-scale proposals of 10 dwellings or more, particularly where there is a lack of green infrastructure. The policy and justification imply, but do not sufficiently justify, that development should make up for the lack of existing green infrastructure in the area. The policy should make it more explicit that large scale developments shouldn't need to make additional provision for existing shortfalls in Green Infrastructure.
- 'The North Somerset Climate Emergency Strategic Action Plan identifies the need to replenish carbon stores in the district. GI is relevant since it involves providing and maintaining areas of vegetation and trees... The GIS objectives include ... the creation of bigger, better, more and joined-up woodland, grassland and wetland habitats to achieve the ambitions of the West of England Nature Recovery Network'. About a third of total methane emissions comes from wetlands, so how does the creation of 'bigger, better, more and joined-up wetland habitats' assist the declared climate emergency ambitions/targets/etc?

DP35: Nature conservation**Level of response to this policy:**

Number of representations received: 17
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 6 No: 8 Unsure: 1 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 7 No: 1 Unsure: 4 No answer: 5
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 7 No: 1 Unsure: 4 No answer: 5

Main issues raised:

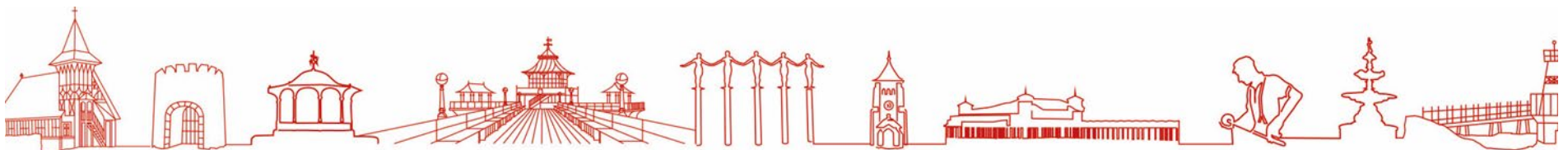
- The Nature Parks that have been referenced and planned will be insufficient to mitigate the negative impact on local wildlife and biodiversity. In particular the Greater and Lesser Horseshoe Bats which are of international importance.
- Support DP35 but it is not sound, effective or consistent with national policy as no reference to hedgehog highways for all new developments in accordance with NPPG. Add: All developments to include hedgehog highways.
- The text should mirror the wording in the NPPF which refers to the protection and recovery of priority species.
- The justification to the policy should strongly recommend using Nature Parks as the preferred option for off-site mitigation. Note also that off-site mitigation may be required where development affects Greater or Lesser Horseshoe bat habitat (currently the justification refers to just Greater Horseshoe bats). Recommend that preparation of a masterplan is required, illustrating how Nature Parks will enhance and support the strategic GI Corridors identified in the North Somerset GI Strategy and indicate the timetable for their delivery. This information will provide clear evidence to support the conclusions of the HRA.
- The policy section on ecological mitigation measures should require that the up-to-date ecological survey be carried out by an appropriately qualified professional, to ensure that reports are up to date, accurate, robust and can be trusted.
- The wording 'proposals should seek to minimise impacts on biodiversity...' is weak. Proposals should provide a minimum 10% net gain in biodiversity, and not just seek to minimise impact.
- Recognition of the Mendip Hills National Landscape (formerly AONB) Nature Recovery Plan would be useful in this policy.
- The North Somerset & Mendip Bats Special Area of Conservation (SAC) should be significant enough to have its own policy due to the cumulative significant impacts that piecemeal development (across the area and over time) has on this SAC and protected horseshoe bats – which otherwise could go unrecognised at a strategic level.
- The first paragraph should also contain acknowledgement that mitigation is also an appropriate form of nature conservation.
- The binary test of the sentence which states 'development which would have an adverse impact on identified sites of international importance (which include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Ramsar sites) will not be permitted' should be removed or amended. This sentence is contrary to the steps undertaken through a Habitat Regulations Assessment.
- The policy statement that development within or in proximity to a SSSI or National Nature Reserve that is likely to have a direct or indirect adverse effect on its biodiversity or geological interest would not normally be permitted is not the same as Framework paragraph 186 bullet point b). Importantly it omits the exception (being 'where benefits of the development in the location clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest'). Local Plan policies should not seek to paraphrase national planning policy and instead should be 'consistent' with it. As such, the wording should be amended or removed.



- The plan's HRA process and document are not thorough enough to fully assess the risks of development to the North Somerset and Mendips Bat SAC.
- The Greater Horseshoe Bat population at Brockley Hall Stables SSSI has suffered a decline in each of the last three successive years, for unknown reasons. The national trend is improving. An assessment of risk should consider this together with the Natural England definition of Favourable Conservation Status for this species published January 2023.
- The Bat SAC SPD is currently being updated based on extensive new research initiated by NSC. The HRA should be reviewed against this information and emerging research.
- The development proposals at Backwell will affect the GHB Juvenile Sustenance Zones defined in the Bats SAC SPD.
- Amend from 'nesting features for swifts, swallows,' to 'nesting features such as swift bricks for swifts, swallows,...', and add an additional sentence: 'Swift bricks are a universal nest brick for small bird species and should be installed in new developments including suitable extensions in accordance with best-practice guidance, such as BS 42021:2022 and CIEEM.'
- Nature Parks are located in areas that have been modelled as providing the most important habitat and connectivity for bats. Does the modelling match real world outcomes? Will other districts also use NSC sites for offsetting their nature requirements (not only bats)? How will this affect farming, food production and security and its associated land?
- The policy does not identify specific sites to perform the role of nature parks, nor does it establish any criteria for the suitability of sites to be designated as nature parks. The supporting text advises that NSC would prefer developers to use North Somerset Nature Parks to mitigate any impacts of development on greater horseshoe bats. The Council has commissioned the University of West of England to identify the best locations for Nature Parks to best support the protection and enhancement of land for the benefit of the greater horseshoe bats. It is unsound to proceed with a policy for nature parks prior to the outcome of the UWE research and the subsequent identification of suitable land on the Policies Map. This is necessary to ensure adequate land is available and deliverable in the best locations, to adequately mitigate the impacts of development on the horseshoe bat population.
- Current draft version states: 'Incorporation of habitat features of value to wildlife within the development and building design, including those which meet the needs of local species (such as provision of nesting features for swifts, swallows, house sparrows, bats).' In order to be effective with respect to cavity nesting birds this statement should reference BS 42021: 2022.

DP36: Biodiversity net gain

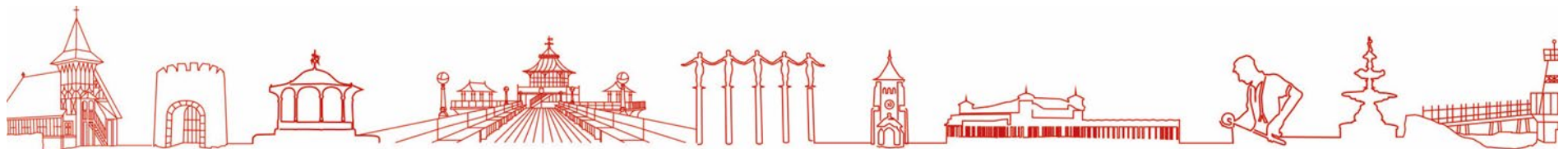
Level of response to this policy:



Number of representations received: 12
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 3 No: 5 Unsure: 1 No answer: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 3 Unsure: 1 No answer: 7
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 3 Unsure: 1 No answer: 7

Main issues raised:

- The Council will need to review this policy to ensure it fully reflects all the new legislation, national policy and guidance. The supporting text contradicts the latest government guidance released in November 2023 by stating that enhanced and/or new habitat provision aimed at meeting those requirements can be counted in the BNG calculation but only to be used to achieve no net loss. The government guidance suggest that habitat provision aimed for protected species/sites on-site can be counted fully towards the 10% net gain requirement.
- As a result of the recently published NPPF (December 2023) the second paragraph of the justification under the draft policy wording regarding point d will need to be updated. The recent version of the NPPF refers to improving the area rather than minimising impacts.
- The advice from Government is that Biodiversity Net Gain (BNG) of 10% 'will result in more or better quality natural habitat than there was before development'. Where is the evidence to show that this is in fact the case? In an ecological crisis why is the Net Gain not higher - say at 20 or 25%? The Council may like to put more emphasis on reminding developers that 10% net gain is a minimum. Also encourage a 'respect for nature' attitude to onsite development from the outset.
- The Council should consider that mandatory net gain will be required by the time this plan is adopted, and therefore the policy requirements as drafted will be superseded by the use of a statutory metric.
- Has it been proven that developing on land (destroying nature in one area) and offsetting it by using an off-site mitigation actually protects or improves nature, rather than damaging it overall? How is offsetting being undertaken, how will it affect land associated with farming, food production and food security?



- The Council should not deviate from the Government’s requirement for 10% biodiversity net gain as set out in the Environment Act. The Plan should provide certainty for developers and a clear BNG policy with a fixed 10% figure, rather than the policy including the phrase “at least 10%” would help to provide this.
- There are significant additional costs associated with biodiversity gain, which will need to be fully accounted for in the Council’s viability assessment.
- There will be a need for this policy and supporting text to say more about Local Nature Recovery Strategies. As the LNRS emerges it will be important for this Local Plan to be kept under review
- It will be important to differentiate between the mitigation hierarchy, which seeks to avoid harm and then mitigate it in relation to protected habitats and the BNG hierarchy which prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits.
- Reference could also usefully be made within the Plan to the small sites metric.

Support/other comments:

- The policy on biodiversity net gain aligns with national policy and legislation and sets out that proposals must demonstrate at least a 10% net gain accounted for in a biodiversity gain plan.
- The requirements of policy DP36, which conforms with national guidance that where required, including at least 10% BNG is supported and line with the national requirement which will come into force in the coming months.

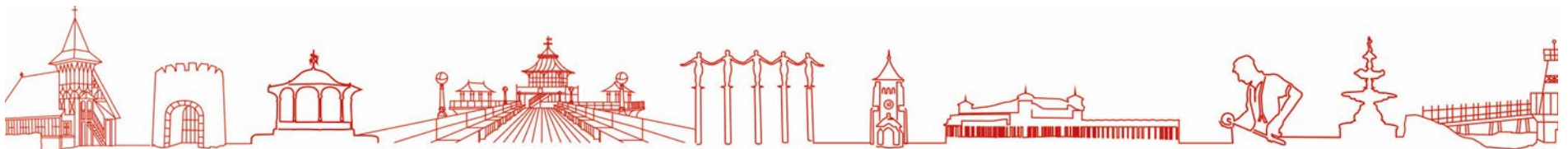
DP37: Trees, woodlands and hedges

Level of response to this policy:

Number of representations received: **18**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **2** No: **10** Unsure: **2** No answer: **4**



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **3** No: **2** Unsure: **2** No answer: **11**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **2** No: **2** Unsure: **1** No answer: **13**

Main issues raised:

- Some elements of this policy need to be considered in tandem with the BNG metric. Could lead to double counting and tree planting is required as part of the metric or conflict with elements of the BNG metric e.g. planting trees in residential gardens has risk as maintenance/management is left to property owners. Needs to be clarified.
- Objection to requirement to plant the equivalent of a minimum of one tree per dwelling in gardens where practical or within community gardens. It is felt that there is no rationale for this formula and it is impractical as the maintenance and management lies with individual residents so they could be removed. It also gives no consideration to site specific characteristics. Request removal of this requirement.
- The compensation strategy set out within the policy supporting text does not allow for due consideration to the quality of the trees being lost. It also needs to be clear whether it applies to the loss of all existing trees or just to certain trees such as veteran trees or champion trees. If it's all trees, then it's overly onerous.
- Policy is too wordy and detailed. Duplicates with DP35: Nature Conservation.
- The viability assessment doesn't take into account the cost of this policy and the tree planting requirement.

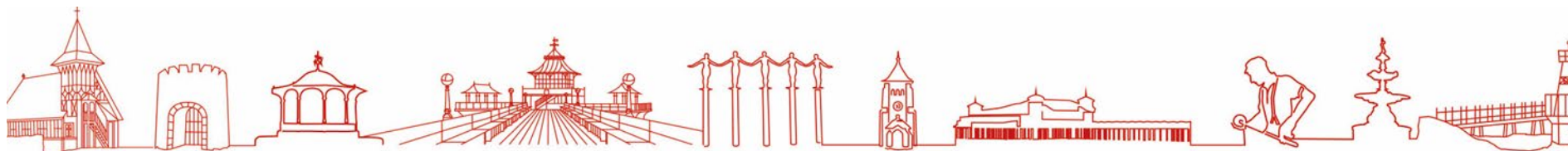
DP38: Landscape

Level of response to this policy:

Number of representations received: **4**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **0** No: **2** Unsure: **2** No answer: **0**



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **1** No: **1** Unsure: **0** No answer: **2**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **0** No: **2** Unsure: **0** No answer: **2**

Main issues raised:

- Suggestion that the policy is unnecessary with most points detailed in policy DP38 covered by other policies within the plan.
- Concern that diversification of farms and farmland for other uses such as solar panels will have an adverse impact on the landscape and food production.
- The policy deals with 'landscape'; requiring in the first paragraph that it be 'protected and enhanced'. The test is overly restrictive and not consistent with the NPPF. The Framework requires that valued landscapes are protected but that general landscape related policies should contribute to and enhance the natural and local environment by 'recognising the intrinsic character and beauty of the countryside'.
- Amend the wording of the policy by removing the first paragraph to be consistent with national policy as is not required for the policy to be otherwise acceptable.

DP39: Mendip Hills AONB

Level of response to this policy:

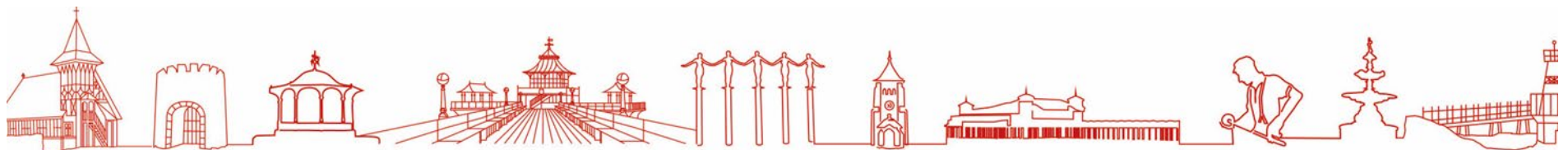
Number of representations received: **6**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **0** No: **3** Unsure: **0** No answer: **3**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **0** No: **0** Unsure: **1** No answer: **5**

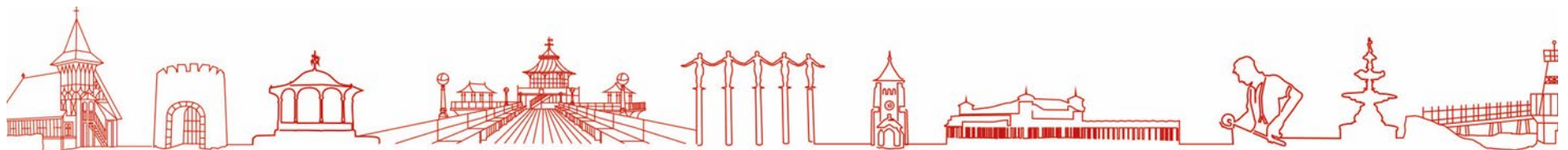


Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: 0 No: 1 Unsure: 0 No answer: 5

Main issues raised:

- Areas of Outstanding Natural Beauty (AONB) are now referred to as National Landscapes. This terminology should be adopted in the final plan.
- Concerns that the policy could hinder development at the Wolverhill strategic site which is visible from the AONB. Specific concerns relate to:
 - Request clarity in policy regarding major development not being permitted – it should say ‘major development within the AONB...’
 - Concerns over wording which states that ‘development which would have an adverse impact on the landscape, setting and scenic beauty of the Mendip Hills AONB, including views into and out of the AONB, will not be permitted unless in exceptional circumstances and where it can be demonstrated that it is in the public interest’. This is too onerous, particularly in relation to the views into and out of the AONB and could affect development at Wolverhill.
- Policy needs to reflect the new statutory duty of any relevant authority to the purposes of National Landscapes. Therefore, the policy should also reference the 12 ‘special qualities’, and the Mendip Hills National Landscape Nature Recovery Plan.
- Request that that the area covered by the NL should be corrected to 198sqkm (not 206sqkm).
- It should be noted that the present Mendip Hills AONB Management plan (2019-2024) is in the process of being updated – soon to be Mendip Hills National Landscape Management Plan 2024-2029. The justification should be amended to reflect this.
- To reflect the Levelling Up and Regeneration Act 2023 request that the wording of paragraph 2 of the justification should be amended as follows; ‘The Mendip Hills AONB, designated in 1972, covers 198 sq km, and is divided between the administrative areas of North Somerset, Bath and North East Somerset, Somerset. The National Landscape (AONB) designation confers additional duties on local authorities. The application of this policy should help to conserve and enhance the landscape and natural beauty of the Mendip Hills National Landscape (AONB.)’



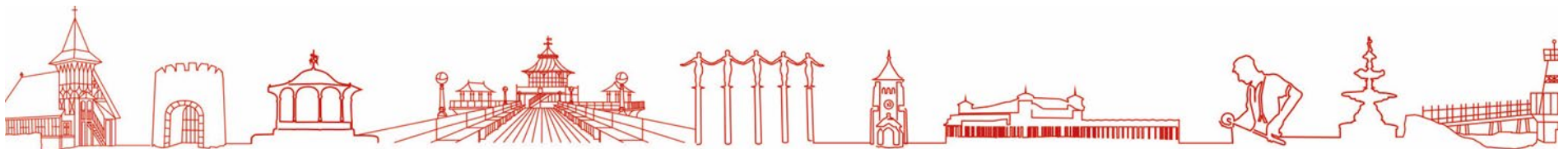
DP40: Built heritage

Level of response to this policy:

Number of representations received: 4
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 0 No: 1 Unsure: 2 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 0 Unsure: 0 No answer: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 0 Unsure: 0 No answer: 3

Main issues raised:

- Policy DP40 largely replicates national policy / guidance in the National Planning Policy Framework (NPPF) and the associated Planning Practice Guidance (PPG) which supports the Framework.
- Policy DP40 makes no mention of the great weight that must be applied to the conservation of the heritage asset in accordance with NPPF. An adjustment is made to ensure the plan accords with the NPPF.
- Policy is inconsistency with the national Planning Policy Framework. Despite an additional paragraph having been added relating to significance of heritage assets and justification of harm, the policy remains inconsistent with paragraphs 205 – 214 of the Framework which contain a much more nuanced approach, reflecting the magnitude of harm and setting out appropriate justification in each case.
- The policy as written proposes a threshold of ‘no harm’ or ‘preserve’ – a binary starting point where no harm is acceptable. The Framework, however, seeks to balance harm against public benefits, even in circumstances where substantial harm will occur. For this reason, the current wording of draft Policy DP40 is unsound and must be comprehensively revised in line with national policy.
- The inconsistency with the Framework not only renders the draft policy unsound but would, if adopted in its current form, present challenges for accurate and consistent decision making.



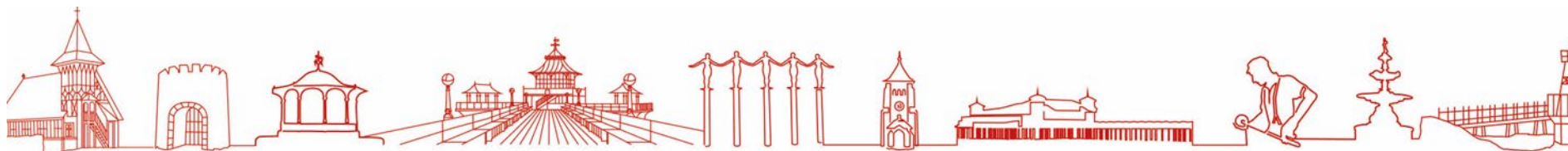
DP41: Archaeology

Level of response to this policy:

Number of representations received: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 0 No: 2 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 0 Unsure: 0 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 0 Unsure: 0 No answer: 1

Main issues raised:

- To aid clarity and consistency with the NPPF it is suggested the 'written justification' refer to NPPF Footnote 72. Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets. At present, it is not clear the weight that should be attached to archaeology of demonstrable equivalent significance to scheduled monuments.
- Policy wording should be amended to reflect that field evaluation will only be required when necessary and the following wording removed from the policy: 'development proposals that would affect archaeological remains will be expected to demonstrate, by a thorough understanding of the significance of the asset, how any change proposed would preserve and, where appropriate, enhance their significance'. This is because it requires 'preservation' as a blanket response where as in the vast majority of circumstances, preservation in situ is not required.



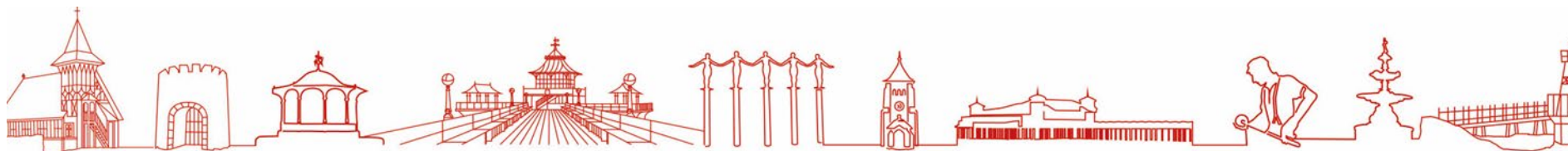
DP43: Affordable housing (including rural exception sites)

Level of response to this policy:

Number of representations received: 44
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 5 No: 33 Unsure: 0 No answer: 6
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 7 No: 14 Unsure: 5 No answer: 18
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 5 No: 15 Unsure: 6 No answer: 18

Main issues raised:

- Plans should be informed by viability assessments. The visibility assessment identifies that PDL in lower value areas is likely to be able to support nil or very little affordable housing and even in higher areas it would only be viable to provide between 30-35% on greenfield sites. Policy is not consistent with national policy and will reduce the number of affordable homes delivered. The 38.5% figure is not justified – it resulted from a member amendment at Committee.
- In respect of rural exception schemes, the inclusion of a criteria relating to a 'sequential approach' is a deviation to national policy and could hinder the delivery of affordable housing where it is needed.
- NPPF paragraph 82 states that local authorities should consider allowing some market housing on rural exception sites to facilitate delivery.
- The proposed affordable housing is not genuinely affordable to the people who need housing most. The Council should use brownfield land to build flats for people who need start up homes.
- Need a higher percentage of genuinely affordable housing, with priority given to local people with a strong connection to the village or key workers. Local residents should be given priority. Consider need for affordable housing for NHS staff and those employed by health and care providers.



- Policy should include more flexibility on viability issues. Need to fully consider the wide range of challenges and additional costs facing developers. Changing the type of affordable housing can help improve viability and the plan should recognise this.
- PPG sets out the actions the Council should take in relation to providing First Homes if there are concerns about affordability. Simply saying that First Homes will not be required and implementing a policy that seeks an alternative form of affordable housing is not one of the options.
- Shared ownership is more effective than First Homes. Should adopt a similar approach to B&NES where First Homes is either included as a possible affordable home ownership option or excluded on the basis of not meeting needs. The proposed 77% social rent/23% shared ownership would lead to limited provision of shared ownership properties and does not allow for affordable rent.
- Need to set affordability target at 40% for all housing as this is close to the assessed need and prioritises affordable housing.
- Not clear how effective the policy will be in delivering the overall amount of affordable housing required. Need to set out the affordable housing land supply position.
- There is a need to increase the overall housing requirement to boost the delivery of affordable housing. There will be a shortfall in affordable housing on all settlements over the plan period. The LP will deliver only up to 35% of the unconstrained affordable housing need and up to 81% of the constrained 'policy on' need – resulting in a shortfall of c1058 affordable dwellings over the plan period, Using the standard method could deliver 110% of the constrained 'policy on' affordable housing need. This is a more appropriate starting point where a reduction in affordable housing shortfalls and unmet backlog need is a priority.
- At Wolverhill the viability assessment found 20%, possibly up to 35% affordable housing viable but inclusion of a secondary school or other expensive infrastructure significantly impacts the viability.

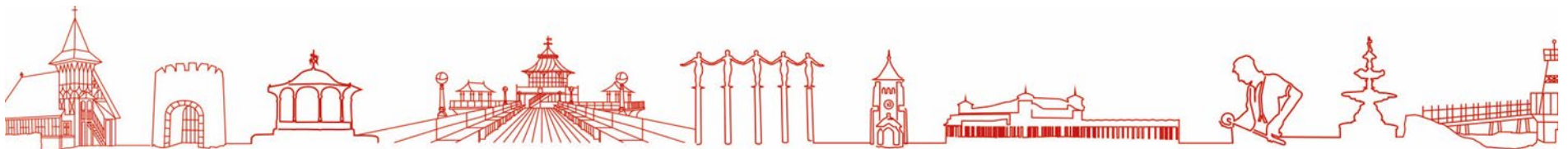
DP44: Gypsies and Travellers and Travelling Showpeople and Schedule 8

Level of response to this policy:

Number of representations received: 7

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: 3 No: 4 Unsure: 0 No answer: 0



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

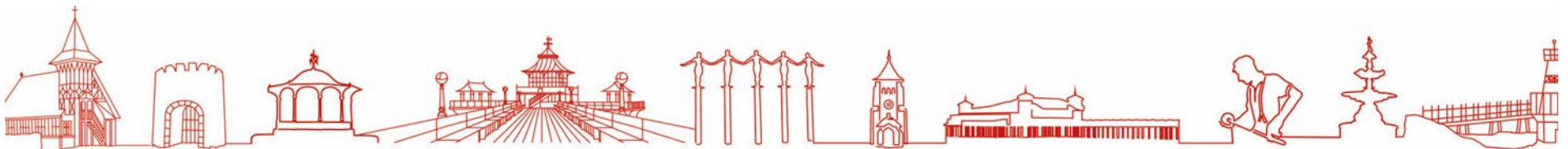
Yes: **1** No: **1** Unsure: **0** No answer: **5**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **1** No: **0** Unsure: **1** No answer: **5**

Main issues raised:

- A number of developers at the Wolverhill Strategic Development Location object to the wording in the policy requiring sites to come forward within that location to meet the longer term need. Reasons for the objection include it is unclear what the scale of 'longer term need' may be, and therefore whether it is appropriate for that need to be met as part of the Wolverhill development.
 - It is not clear why sites submitted through the Call for Sites process in the Green Belt have been discounted.
 - There is no evidence that proposals for Gypsy and Traveller sites at Wolverhill Strategic Development Location will be deliverable, or will not have adverse viability impacts on the delivery of other aspects of Council's vision for this area.
 - There is no evidence to show how new pitch provision could be successfully integrated within the wider new community development, as an appropriate location to meet the specific needs and preferences of these groups. There should be a reasonable prospect that the site is available and could be developed at the point envisaged.
 - There is no evidenced consideration of Council owned land/sites which are included on the Councils brownfield land register as potential Gypsy and Traveller sites. These should be actively considered in preference to the allocation of provision within the strategic location.
 - There is a lack of evidence to demonstrate that the Wolverhill Strategic Location is the best or most appropriate available option to meet the longer terms needs for provision in North Somerset.
- Proposal for an allocation of land off the A370 in Hewish for a Gypsy and Traveller site to provide private pitches to give more choice in terms of accommodation to those in the Gypsy and Traveller Community. The proposed allocation in the plan is only for rented pitches.
- Environment Agency - Proposals at both sites need to be in line with the National Planning Policy Framework and Flood Risk Assessment undertaken. Foul drainage infrastructure needs to be carefully considered for both sites as they are close to Biddle Street Yatton SSSI and Puxton Moor SSSI so could be hydrologically linked and impact these SSSIs. Connection to a mains foul sewer would be the preference, if this is available.



- National Grid – The proposed allocation of land to the North of Moorland Park for a Gypsy and Traveller site is crossed by or close to National Grid Electricity Transmission (NGET) assets. Include wording to the following effect: ‘the development will be developed with the following site-specific criteria: a strategy for responding to the NGET proposed Hinkley Point C Connection present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design.’

Support/Other Comments:

- Support from two respondents stating that the policy approach allows appropriately located pitches to come forward during the local plan period.

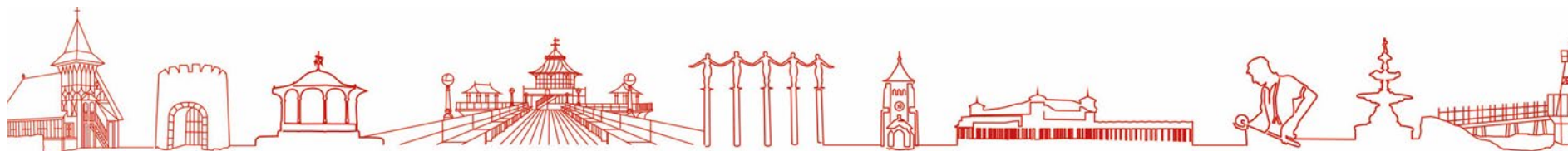
DP45: Residential space standards

Level of response to this policy:

Number of representations received: 7
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 1 No: 5 Unsure: 0 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 0 Unsure: 1 No answer: 5
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 0 No: 1 Unsure: 0 No answer: 6

Main issues raised:

- Objection to a blanket application of the Nationally Described Space Standard (NDSS) across all residential development as it is felt it could undermine the viability of many development schemes. This has not been justified and will potentially result in fewer homes



being delivered as optional technical standards have implications for build costs and sales values, with implications in turn for development viability.

- It is possible that 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. It can impact on affordability.
- Concerns on the application of NDSS to existing dwellings and extensions. Such application is considered overly restrictive, especially where additional bedrooms are not proposed. Concern with requirement in policy which states that 'all rooms which are additional to the main living spaces will be regarded as having the potential to serve as a bedroom and as such will be required to meet the NDSS regardless of the description on the planning application.' This is overly restrictive and the NDSS should only be applied to new dwellings.
- Planning proposals should also include adequately sized safe refuge, for those sites in flood zone 2 or 3. This should be in line with the NPPF and Flood Risk Assessment requirements. Suitable flood warning and evacuation plans, will also be required.

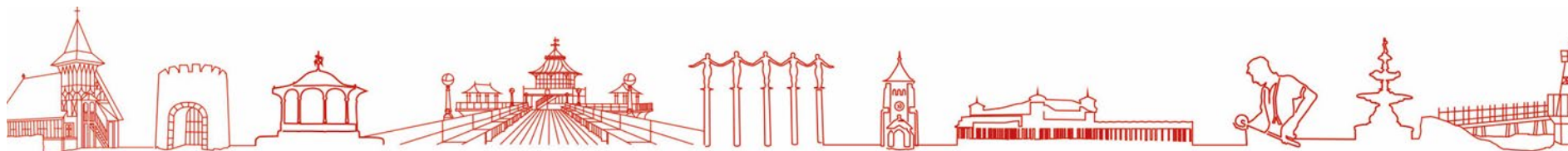
Support/Other Comments:

- Comment supporting this policy (along with other policies) for providing choice and variety in terms of meeting housing needs.

DP46: Housing type and mix

Level of response to this policy:

Number of representations received: 21
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 3 No: 12 Unsure: 0 No answer: 6
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 2 No: 3 Unsure: 3 No answer: 13
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 5 Unsure: 1 No answer: 14



Main issues raised:

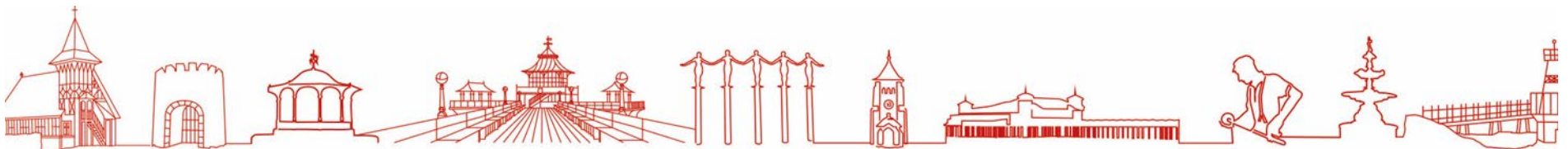
- Objection to the threshold of 10 dwellings in the policy that would trigger the need to provide older persons housing, a mix of housing types and some self/custom build plots. It is considered that this threshold is too low, not evidenced and unworkable.
- There is no precision in the policy indicating the quantum of each type of home that is required to satisfy the requirements. The allocations and/or the policy and/or other policies needs to be more robust and/or prescriptive in expectations for the type of housing delivered on site. The policy and allocations as worded provide very little assurance that anything other than mainstream housing will be delivered (or even supported) on any allocated, or unallocated site.
- The number of houses proposed will not deliver the range of housing needed. Allocated sites (which aren't windfall or don't have consent) only amount to 6,207 dwellings. This puts significant pressure on a relatively small number of housing sites. It is not realistic to expect that that the range and type of housing proposed in the policy will be delivered on these sites. Furthermore none of the allocations prescribe a requirement to deliver anything other than mainstream housing.
- Draft Policy DP46 fails to clarify whether the policy requirements should be applied to developments on land allocated including at Wolverhill (north of Banwell) strategic location. Draft Policy LP1 does not specify that provision should be made at Wolverhill for older persons housing and self and custom build plots and it does not specify the mix of bedrooms.

Comments on housing types requirement:

- The policy refers to restricting certain property sizes 'where there is an existing over provision'. The policy needs to define the data sources that are to be used to determine whether an over provision exists and what proportion of a certain dwellings type represents over provision.

Comments on Older Persons Accommodation requirements:

- The economics of providing older persons housing are different from open-market and affordable housing, for example, due to the need to provide communal spaces. Therefore, this type of housing should be considered separately in the whole plan viability appraisal.
- The Council should ensure that the Local Plan will result in a wide range of older persons housing and self and custom build housing opportunities. In order to provide homes for older people, the Council should allocate sites for older persons housing.
- There is no definition of older persons market housing in the policy or supporting text. It's not clear what this element of the policy is seeking to achieve or how it would be implemented. Is it the intention of the Council that this policy will be tied in any way to the



needs or characteristics of specific occupiers? Will it be managed as part of the affordable housing stock? There is so much uncertainty in the approach to older persons housing that it is impossible to implement the policy effectively and consistently.

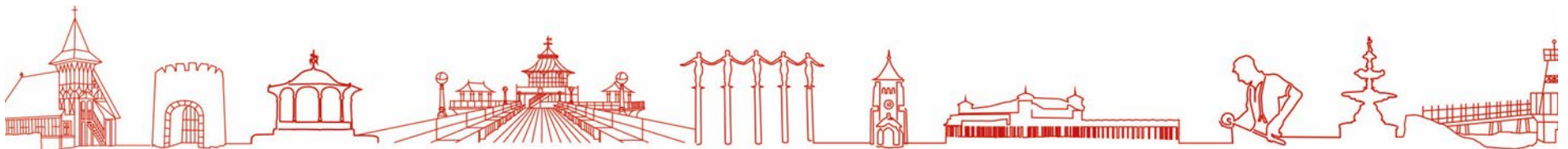
- Downsizing should not be seen as a replacement for specialist older persons housing. Policy DP46 point 1 should therefore be amended as follows: delete 'or mainstream housing which is designed for older people such as properties suitable for downsizing.'

Comments on self-build/custom build requirement:

- The policy requires the provision of self-build and custom-built homes based on the local need identified however does not give specific percentages of the overall development. Would a high level of identified need result in the requirement for a higher percentage of self-build plots for example.
- If an application is submitted for 10 dwellings and there are 10 individuals registered on the self-build register, does that mean that the Council will seek all of the new homes to be self-build? We assume not, but there is so little certainty in the way in which the policy is to be applied that it could be one interpretation.
- For certainty, a maximum percentage should be given for open market developments which needs to be determined with reference to viability work.
- The policy should include a mechanism that allows self-build plots on site to be developed as market housing if after 12 months of marketing, there has been no interest. This will ensure that the policy requirement remains flexible and maximises housing delivery.
- The self-build requirement needs to relate to the self-build register for the locality of the site specifically, rather than the register for the district.
- It is important to differentiate between people on the register to give an accurate reflection of what their requirements are e.g. identify the number of individuals with a genuine interest in self-build as part of a larger housing development.
- It would be positive to see affordable housing mentioned within this self and custom build supporting text and advise that the Council refers to the Self-Build and Custom Housebuilding Planning Practice Guidance when formulating new policy.

Comments on accessible and adaptable housing:

- It is recognised that the requirement for all new dwellings to be M4(2) standard reflects the governments intentions regarding amending building regulations however it is felt that this is not needed as a local plan policy as it will be set out in Building Regulations. It is not appropriate to make policy based on changes the authority consider may take place in a regime outside of planning. There is no evidence that all new dwellings need to be M4(2) compliant, nor that it would be viable to deliver all as such.
- The policy wording needs to differentiate between Part a) and part b) of M4(3) technical standards. M43a sets out standards for wheelchair adaptable housing, where M43b relates to wheelchair accessible housing which can only be required on affordable



housing where the Council has nomination rights. Any such requirements would also need to be fully considered from a viability perspective.

- The policy requirement for 5% of affordable housing to be wheelchair accessible will not meet the identified need and should be 5% across affordable and market housing.
- The PPG sets out some of the circumstances where it would be unreasonable to require M4(2) and M4(3) compliant dwellings. Such factors include flooding, topography and other circumstances. It is suggested that flexibility is needed in the application of these standards to reflect site specific characteristics, and the policy wording should reflect this as the standard requirement for accessible and adaptable housing will not be achievable on all sites.
- Genuine starter homes should be included in new developments, and first priority for social housing and shared ownership schemes should be given to residents. Residents looking to downsize or requiring accessible housing would benefit from a greater availability of bungalows, which would in turn free up under-occupied older housing stock.

Support/Other Comments:

- Planning proposals should be in line with the NPPF and Flood Risk Assessment requirements. Suitable flood warning and evacuation plans, may also be required, including an adequately sized safe refuge.
- Support for the fact that there is no specific requirement to provide such accommodation on allocated sites.
- Self and custom build helps to diversify the housing market and increase consumer choice.

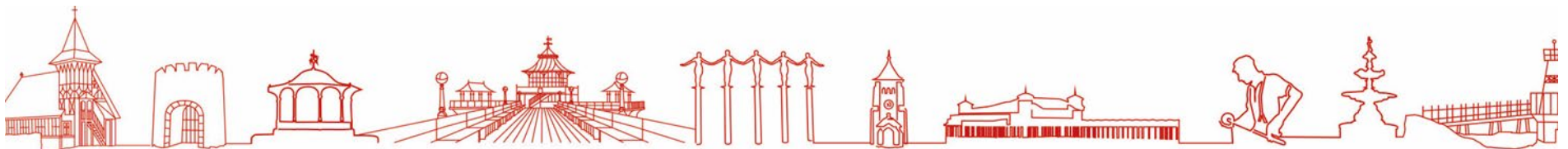
DP47: Older persons accommodation

Level of response to this policy:

Number of representations received: **11**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **3** No: **6** Unsure: **0** No answer: **2**



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

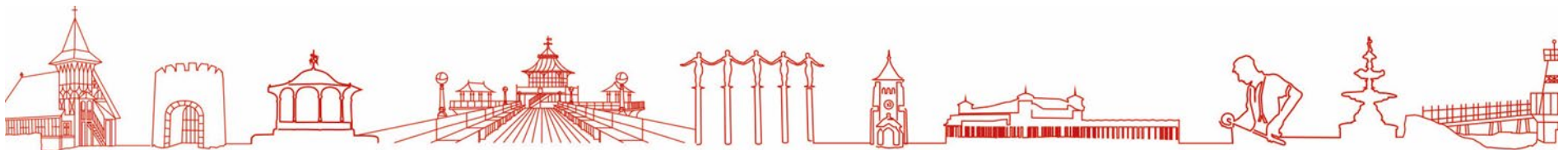
Yes: 2 No: 1 Unsure: 1 No answer: 7

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: 2 No: 1 Unsure: 1 No answer: 7

Main issues raised:

- The economics of providing older persons housing are different from open-market and affordable housing, for example, due to the need to provide communal spaces. Therefore this type of housing should be considered separately in the whole plan viability appraisal.
- Objections to requirement in policy that an element of affordable housing provision is required a part of market-led developments for older people. Respondents felt this should be viability tested and that affordable housing was not appropriate on C2 schemes.
- Not enough older persons accommodation will be provided as allocated sites (which aren't windfall or don't have consent) - only amounts to 6,207 dwellings. The LHNA identifies a need for 1,447 units of specialist older persons housing which is 23.3% of these allocated sites. It is not realistic to expect that that level of older persons housing will be delivered on these sites.
- In order to provide homes for older people, the Council should allocate sites for older persons housing.
- Indicative figures or a range should be provided for the number of units of specialist housing for older people that is needed across the plan area throughout the plan period, as required in PPG.
- The Local Plan should recognise that housing for older people has its own requirements and cannot be successfully considered against criteria for adaptable and accessible general family housing or smaller homes. Reference to mainstream housing being appropriate should be removed.
- Objection to the detail in the justification which requires older person accommodation is marketed and made available for sale or rent within the district for a period of at least six months before it is marketed more widely. The requirement to restrict marketing to the district area for a 6-month period is inflexible and should be removed from the plan.
- Developers of older person's housing schemes should not be required to demonstrate need given the significant need identified and the many benefits that such developments bring and point 1 of policy DP47 should be deleted.
- Downsizing should not be seen as a replacement for specialist older persons housing.



Support/Other Comments:

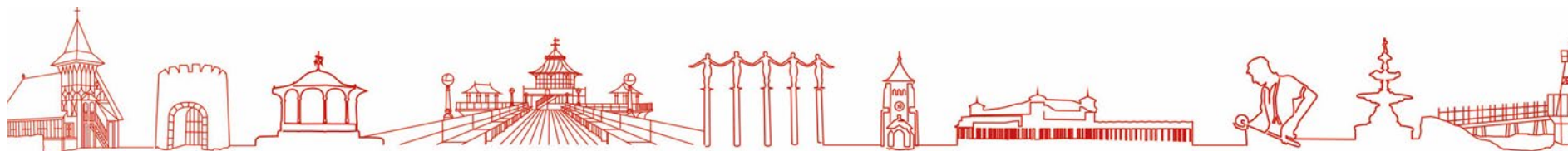
- Support for the policy as it helps to provide choice and variety in terms of the meeting the housing needs of people in North Somerset.
- Welcome the fact that comments from previous regulation 18 representations have been taken on board with the introduction of a new individual policy for older population.

DP49: Healthy places**Level of response to this policy:**

Number of representations received: 4
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 0 No: 0 Unsure: 1 No answer: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 0 No: 0 Unsure: 1 No answer: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 0 No: 0 Unsure: 1 No answer: 3

Main Issues Raised:

- Concern that the proposed housing allocations in the plan will make roads busier impacting on health in terms of air pollution, noise and road safety.

Support/Other Comments:

- Support for the policy as it recognises the connection between planning and health, and the role the planning system has to play in creating healthy communities. Request that the NHS is involved in developing further guidance in HIAs.
- Support for the policy and other policies in the plan which will ensure new developments will create the right environment to help people get more active helping with health and wellbeing.

DP50: New community facilities, open space and sports pitches.

Level of response to this policy:

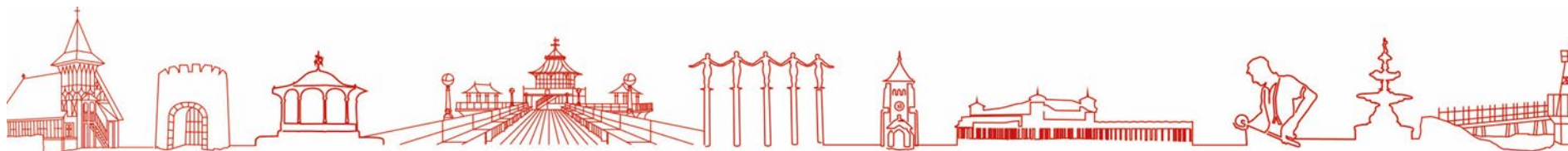
Number of representations received: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 0 No: 1 Unsure: 0 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 0 No: 0 Unsure: 1 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 0 No: 1 Unsure: 0 No answer: 2

Main issues raised:

- Currently ignores existing facilities which lie outside settlement boundaries and the policy should be amended to include reference to such facilities – ‘proposals for community facilities, open space and sports pitches within settlement boundaries, or on existing sites in such use, will be supported where...’

DP51: Protection of built community facilities

Level of response to this policy:



Number of representations received: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 1 No: 0 Unsure: 0 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 0 Unsure: 0 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 0 Unsure: 0 No answer: 2

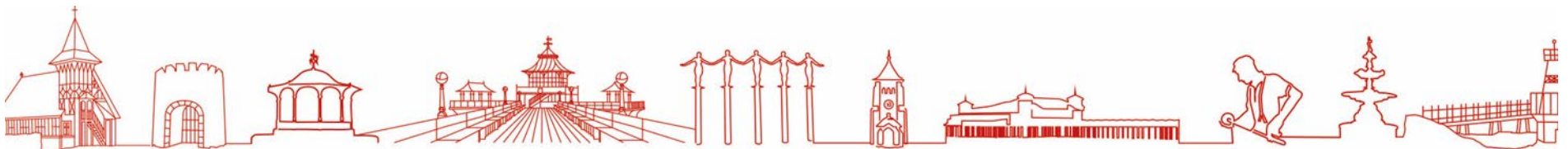
Main Issues Raised:

- Can potentially have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community.
- Proposed Modification to Policy DP51 - inclusion of additional bullet point: 'where healthcare facilities are declared surplus or identified as part of an estate strategy or service transformation plan where investment is needed towards modern, fit for purpose infrastructure and facilities, there will be no requirement to retain any part of the site in an alternative community use.'

DP52: Protection of open space and recreation

Level of response to this policy:

Number of representations received: 5
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 1 No: 3 Unsure: 0 No answer: 1



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **2** No: **0** Unsure: **2** No answer: **1**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **2** No: **0** Unsure: **2** No answer: **1**

Main issues raised:

- Definition of open space is too wide, meaning all development proposals on unallocated green field land will conflict with the policy.
- Policy provisions aren't reflected in planning applications or built development.

DP53: Best and most versatile land

Level of response to this policy:

Number of representations received: **25**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **2** No: **22** Unsure: **1** No answer: **0**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

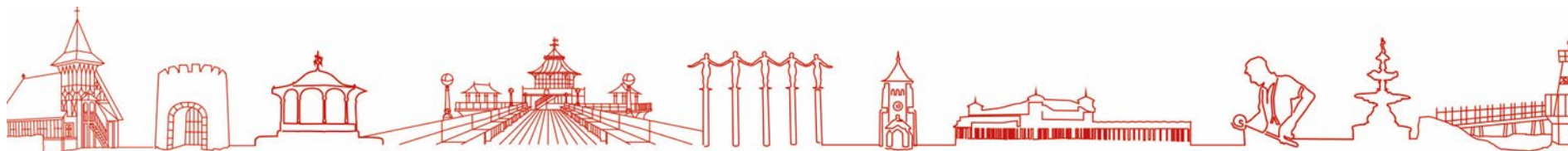
Yes: **4** No: **10** Unsure: **10** No answer: **1**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **4** No: **15** Unsure: **4** No answer: **2**

Main issues raised:

- Objection to the allocation of Grove Farm in Backwell as it would mean losing BMV agricultural land.



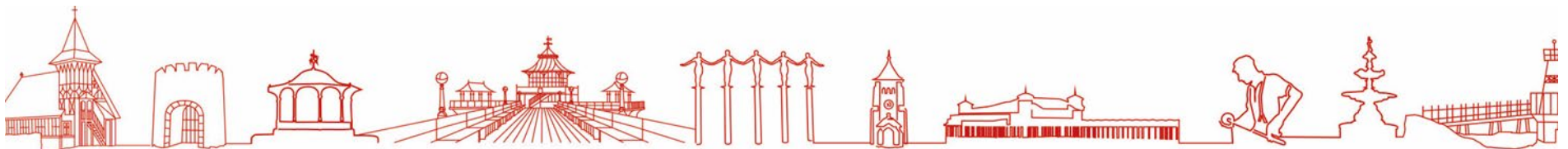
- General concern that the policy is too onerous and not in accordance the NPPF which is more flexible. Suggestion that the policy places an effective moratorium upon development within Best and Most Versatile (BMV) agricultural land, with only very limited exceptions. Concerns include:
 - This could have impact on the delivery of rural exception sites, large scale renewable energy schemes, as well as general housing delivery.
 - Suggestion that the policy should be modified to include criteria reflecting 'significant' scale of BMV loss as over 20ha in accordance with Natural England guidance and the NPPF.
 - Contradiction with allocations in the plan which are on land classified as BMV agricultural land.
- Concern that the policy does not provide enough protection to land that can be used for food production. The protection offered to Grade 3a land in the policy is limited and no protection is offered to grade 3b. The policy should provide more protection to all grade 3 land from all development or alternative uses to protect food security. Particular concern was raised regarding wind farms and solar farms on agricultural land.

DP54: Rural workers housing

Level of response to this policy:

Number of representations received: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 1 No: 1 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 0 No: 1 Unsure: 0 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 0 No: 1 Unsure: 0 No answer: 1

Main issues raised:



- Planning proposals should be in line with the NPPF and Flood Risk Assessment requirements. Suitable flood warning and evacuation plans may also be required, including an adequately sized safe refuge.
- What is being done to protect or 'offset' the land and skills for the existing food production and food security? What is NSC doing to improve farming, food production and food security locally?

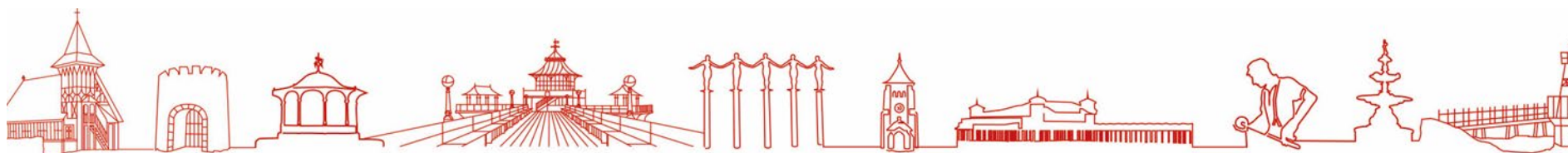
DP55: Agriculture and land based rural businesses.

Level of response to this policy:

Number of representations received: 4
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 1 No: 2 Unsure: 0 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 1 Unsure: 1 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 1 Unsure: 1 No answer: 1

Main issues raised:

- Will NSC guarantee that there will be no adverse effect on food production (for people and animals) with the increase in planting trees and the diversification of farms for example?
- The last bullet point should be amended as follows: 'the siting and design of the building and/forestry planting respects its rural setting and does not harm the character of the landscape or any designated site, priority habitat or protected species.', in the interests of nature conservation and recovery.



DP56: Equestrian development.**Level of response to this policy:**

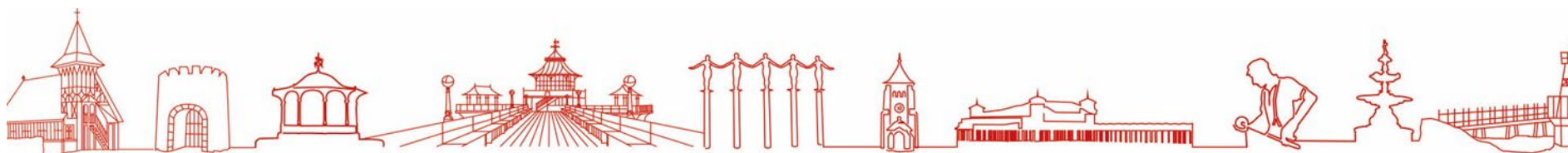
Number of representations received: 5
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 1 No: 2 Unsure: 0 No answer: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 0 No: 1 Unsure: 1 No answer: 3
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 0 No: 1 Unsure: 1 No answer: 3

Main issues raised:

- Use of equestrian land will remove agricultural land and harm food production.
- There should be a requirement that there should be no pollution of surrounding land and watercourses, as well as needing to consider other environmental aspects, such as flood risk.
- The policy states that such development will be permitted provided that sufficient routes are available nearby where riding activities can take place without conflicting with the free flow of vehicular traffic. This should not be a requirement; equestrians have as much right to use the roads as other modes of transport and should not be restricted simply to make life easier for motorists.

DP57: Replacement dwellings in the countryside.**Level of response to this policy:**

Number of representations received: 3
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Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **1** No: **2** Unsure: **0** No answer: **0**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **0** No: **1** Unsure: **1** No answer: **1**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **1** No: **1** Unsure: **0** No answer: **1**

Main Issues Raised:

- Planning proposals should be in line with the NPPF and Flood Risk Assessment requirements. Suitable flood warning and evacuation plans may also be required, including an adequately sized safe refuge.
- Objection to the approach that buildings that have been granted permission for conversion from a non-residential building to a dwelling will not be considered suitable for a replacement dwelling in the countryside.

DP58: Conversion or re-use of rural buildings.

Level of response to this policy:

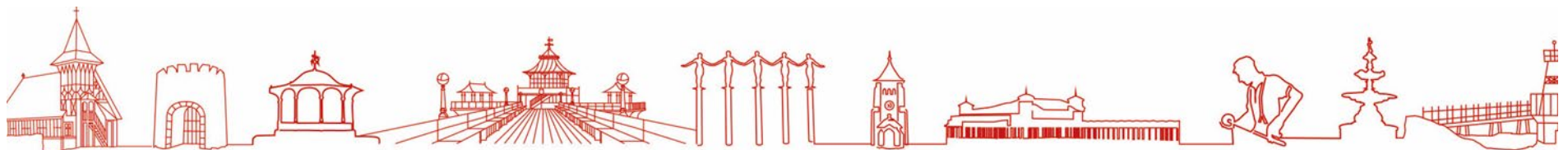
Number of representations received: **3**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

Yes: **1** No: **2** Unsure: **0** No answer: **0**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **0** No: **2** Unsure: **0** No answer: **1**



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **1** No: **1** Unsure: **0** No answer: **1**

Main issues raised:

- Planning proposals should be in line with the NPPF and Flood Risk Assessment requirements. Suitable flood warning and evacuation plans may also be required, including an adequately sized safe refuge.
- This position is in direct contradiction with case law and long-established planning practice. Case Law which has been demonstrated to amount to a material planning consideration and should be taken into account by local planning authorities during decision making.
- 'Retailing will not be permitted, other than farm shops, small scale village stores, proposals under 200m² or proposals that are ancillary to the main use... If the building was completed within 10 years of the application being submitted for an agricultural or equestrian use the applicant will need to demonstrate that the conversion of this building is essential for the long-term benefit of the associated agricultural/forestry/equestrian operation.' How does this policy protect farmers who rent rural building for the housing of animals, feed, machinery, etc.? How will this use be 'offset'?

DP59: Previously development land in the countryside

Level of response to this policy:

Number of representations received: **3**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound?

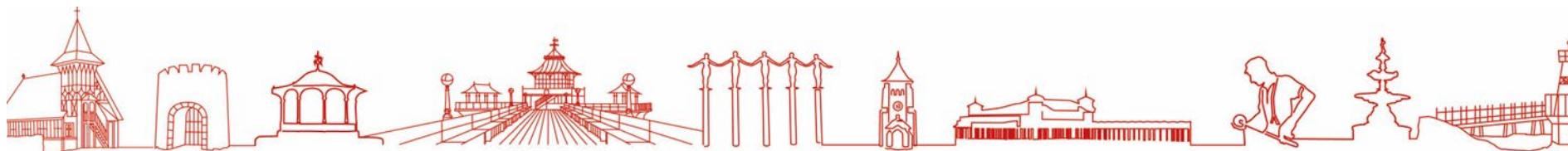
Yes: **1** No: **2** Unsure: **0** No answer: **0**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: **1** No: **1** Unsure: **0** No answer: **1**

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

Yes: **1** No: **1** Unsure: **0** No answer: **1**



Main Issues Raised:

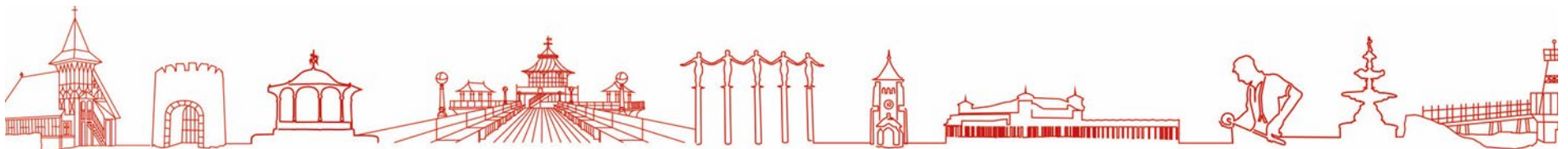
- The policy as worded is unduly onerous and inconsistent with national policy. The level and extent of harm should be considered and balanced in the determination process.
- The policy or supporting text should define 'close to an existing settlement'.
- The policy should not require attempts to secure employment uses before residential is considered appropriate - there is no hierarchy in national policy.

DP60: Employment on green field land in the countryside**Level of response to this policy:**

Number of representations received: 2
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 0 No: 2 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 0 No: 1 Unsure: 1 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 0 No: 1 Unsure: 1 No answer: 0

Main issues raised:

- Objection is raised to this policy as it is overall restrictive and inconsistent with national policy.
- 'Development proposals for new buildings for business use (Use Classes B2, B8 or E(g)) on previously undeveloped sites outside settlements will only be permitted where no suitable redevelopment sites or redundant rural buildings suitable for re-use are



available and: The proposal relates to processing locally grown produce or other land based rural business'. However, how does this policy prevent the other caveats from reducing food production?

DP61: Existing businesses in the countryside

Level of response to this policy:

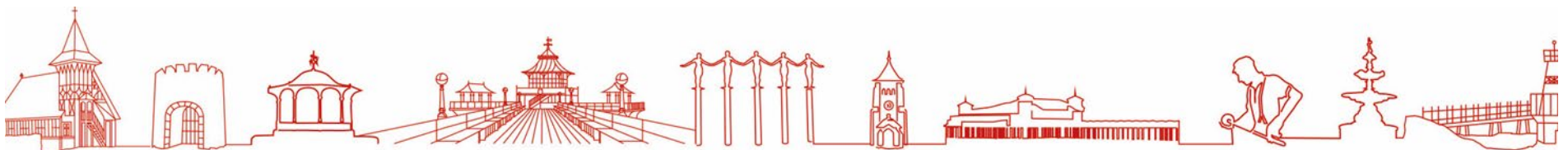
Number of representations received: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 0 No: 1 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 0 No: 0 Unsure: 1 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 0 No: 0 Unsure: 1 No answer: 0

Main Issues Raised:

- Objection is raised to this policy as it would unreasonably restrict the expansion of existing business in the countryside. This is of particular concern in relation to large employment generation business such as Puxton Park which contribute significantly to the local economy.
- The recommended modification is to remove the final three paragraphs/all text after the list of bullet points.

DP62: Visitor accommodation in the countryside including camping and caravanning

Level of response to this policy:



Number of representations received: 4
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 2 No: 2 Unsure: 0 No answer: 0
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant? Yes: 1 No: 1 Unsure: 1 No answer: 1
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate? Yes: 1 No: 1 Unsure: 1 No answer: 1

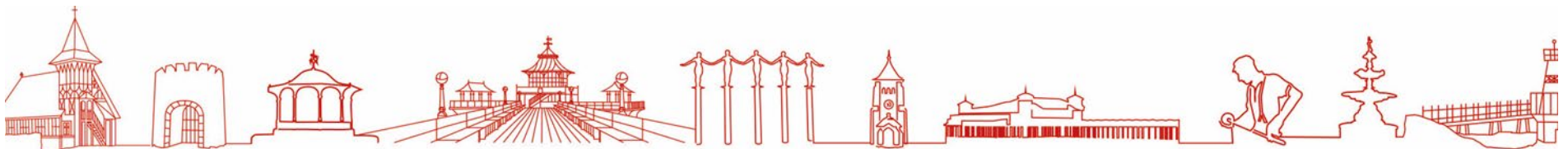
Main Issues Raised:

- The current policy makes no mention of the possible adverse effect on the loss of residential accommodation to holiday accommodation within the countryside.
- Objection is raised to this policy as it would unreasonably restrict the provision of visitor accommodation which could provide an important contribution to the local economy.
 - Delete 6th and 9th bullet points re requirement for the enhancement of the immediate setting and the priority for re-use of existing buildings.
 - Delete last paragraph re subsequent change of use to permanent residential use.

DP63: Infrastructure delivery and development contributions.

Level of response to this policy:

Number of representations received: 16
Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be sound? Yes: 3 No: 7 Unsure: 0 No answer: 6



Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to be legally compliant?

Yes: 5 No: 2 Unsure: 2 No answer: 7

Do you consider the North Somerset Local Plan 2039: Pre-submission Plan to comply with the Duty to Cooperate?

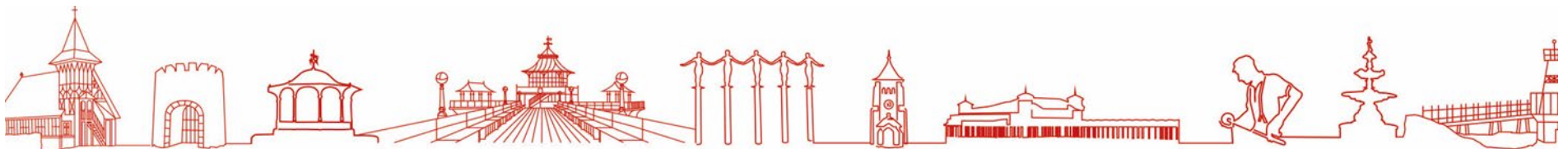
Yes: 3 No: 4 Unsure: 2 No answer: 7

Main issues raised:

- The Council's CIL charging schedule needs to be reviewed.
- The Infrastructure Delivery Plan (IDP) published alongside the Regulation 19 Local Plan does not include detail on the costs of the schemes listed nor how they will be funded.

Support/Other Comments:

- All new dwellings in the plan period should provide for new or enhance existing sport and recreation facilities.
- Comments submitted regarding specific villages, schools, roads and bus routes.
- National Highways requests that 'transport infrastructure' is explicitly referenced in the policy text, and 'highway safety' should be referred to in the supporting text.
- Suggestion that the tests for planning obligations set out in the NPPF at paragraph 57 and Regulation 122(2) of the Community Infrastructure Levy Regulations 2010 should be recorded in the supporting text for completeness.
- Request for a breakdown of education contribution requirements within the policy.



4. Next Steps

- 4.1 On 19 December 2023, mid-way through the consultation on the Pre-submission Plan, the government published the revised National Planning Policy Framework (NPPF). As explained in section 1 the Reg 19 version of the North Somerset Local Plan had been prepared in anticipation of government reforms and anticipated changes to the National Planning Policy Framework (NPPF) in relation to two topics of particular significance to North Somerset; the derivation of the housing requirement and the approach to using Green Belt and other significant constraints.
- 4.2 Paragraph 230 of the revised NPPF published in December 2023 deals with transitional arrangements for local plans currently being prepared and states *“The policies in this Framework (published on 19 December 2023) will apply for the purpose of examining plans, where those plans reach regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (pre-submission) stage after 19 March 2024. Plans that reach pre-submission consultation on or before this date will be examined under the relevant previous version of the Framework in accordance with the above arrangements”*.
- 4.3 Having considered the response to consultation and the guidance on transitional arrangements, the Council has decided to publish a new version of the plan for submission. This new Reg 19 Local Plan is being prepared in the context of the current December 2023 NPPF and is proposed to contain significant changes to the previous document. This will include a roll-forward of the plan period to 2025-2040 as well as other changes in response to feedback from the previous consultation and other issues.
- 4.4 It is anticipated that consultation on the new Regulation 19 plan will commence in Summer 2024 with submission for examination in the Autumn.

