

## Wraxall and Failand Neighbourhood Plan

### Summary of the representations received at Regulation 16 consultation

This document summarises the comments received by North Somerset Council on the Wraxall and Failand Neighbourhood Plan that was submitted for independent examination. All the information about the neighbourhood plan can be viewed at [www.n-somerset.gov.uk/wraxallfailandplan](http://www.n-somerset.gov.uk/wraxallfailandplan)

#### **Background**

The Wraxall and Failand Neighbourhood Plan was submitted for independent examination on 9 June 2023. It was then publicised by North Somerset Council for a six week period of consultation between 6 October and 17 November 2023. This is known as “submission consultation” or Regulation 16 consultation. Comments received were forwarded in full to the examiner for consideration.

A second period of Regulation 16 consultation was carried out at the examiners request from 22 January to 4 March 2024, the purpose of which was to invite comments as to whether the revised consultation statement submitted by the Parish Council in the form of an addendum on 12 January meets the condition required by Regulation 14 a) of the Neighbourhood Planning (General) Regulations 2012 (as amended) and to invite comments on whether the Neighbourhood Plan meets the basic condition of "being appropriate having regard to national policy" in relation to the revised National Planning Policy Guidance issued on 19 December 2023. The below is a summary of the representations received to each of these Regulation 16 consultation periods. The full representations are set out in Appendix 1 and 2.

#### **The Wraxall and Failand Neighbourhood Plan Submission (Reg 16) Consultation - 6 October 2023 to 17 November 2023**

85 comments were received from 38 individuals or organisations. The comments were wide-ranging from short comments in support of the Plan to more detailed suggestions for changes. They were spread across the majority of the plan with comments being received on many of the policies. The statutory consultation bodies (Environment Agency, National Highways, Natural England, Coal Authority, Historic England, Sport England and Exolum Pipeline Systems) responded with no comment or no objection.

The full representations can be viewed in Appendix 1.

In summary the main issues raised included:

- Support for the proposed Local Green Space designations

- Concerns raised over lack of connectivity in the parish in terms of both digital connectivity and public transport.
- Some suggestions for releasing Green Belt land for housing sites.
- Conversely there was support for protecting the Green Belt and policies protecting the natural environment and biodiversity.
- Concern over the safety of pedestrians on some of the roads around the parish and whether the issue had been adequately addressed through the plan.
- Comments about Tynesfield National Trust property in terms of access to the site and parking capacity.
- Some factual corrections.

**North Somerset Council comments:** The full North Somerset Council comments can be viewed at [www.n-somerset.gov.uk/wraxallfailandplan](http://www.n-somerset.gov.uk/wraxallfailandplan)

### **The Wraxall and Failand Neighbourhood Plan Submission (Reg 16) Consultation – 22 January 2024 to 4 March 2024**

The examiner requested a second Regulation 16 consultation be carried out to invite comments as to whether the revised consultation statement submitted by the Parish Council in the form of an addendum on 12 January meets the condition required by Regulation 14 a) of the Neighbourhood Planning (General) Regulations 2012 (as amended) and to invite comments on whether the Neighbourhood Plan meets the basic condition of "being appropriate having regard to national policy" in relation to the revised National Planning Policy Guidance issued on 19 December 2023.

Details of this consultation can be viewed on the [consultation webpage](#).

Seventeen comments were received in response to both elements of the consultation from 8 different respondents including statutory consultation bodies who either had no comment or no objection.

The other responses related to the promotion of land for strategic housing growth around Failand, objection to the extension of Local Green Space at the Elms, suggestion that the plan should be more supportive of green energy and a comment regarding design and the local landscape.

**North Somerset Council comments:** The full North Somerset Council comments can be viewed at [www.n-somerset.gov.uk/wraxallfailandplan](http://www.n-somerset.gov.uk/wraxallfailandplan)

**Appendix 1: Full consultation comments for Reg 16 consultation - 6  
October 2023 to 17 November 2023.**

**Plan section: What is a neighbourhood plan?**

<b>Respondent</b>	<b>Comment</b>
Failand Table Tennis Club	As President of Failand Table Tennis Club, I am very sorry that we have only just picked up the awareness of this document and appreciate the opportunity to study it and respond before the 17th November deadline.
Long Ashton Parish Council	Long Ashton Parish Council acknowledges the hard work and thought that has gone into the various consultations along with the review of North Somerset's Emerging Plan before submitting your Neighbourhood Development Plan. As an adjacent Parish Council, we would like to offer our support for your stated objective of retaining the beautiful countryside we share as well as guiding any development or material changes within your Parish infrastructure for many years to come. We also appreciate that in this fast-changing world, it's not easy to address some of key issues raised during the consultations in a period that covers sixteen years or so and commend the vision to hold regular reviews to ensure the plan is up to date and reflects any changes in the Local Plan. Since our Parish Council is due to update its own Neighbourhood Development Plan, we have read this document with interest. Many of our residents visit Failand & Wraxall and value the beautiful woodlands and high quality green and blue spaces offered by Tyntesfield and Lower Failand as well as greatly appreciating the nature recovery work and guided tours at Watercress Farm. The historic character of Failand & Wraxall as well as the rural aspect are also much enjoyed by those living in Long Ashton. As a result, we have made a few comments on the plan
The LANCE Trust	The Long Ashton Nature, Community & Environment Trust (the LANCE Trust) was formed in 2021 to help maintain and enhance biodiversity within the parish of Long Ashton and beyond. As a result, we hope that Long Ashton Parish Council updates its local Neighbourhood Development Plan as soon as possible and would like to congratulate the Steering Group and other people that have been involved in updating the Wraxall and Failand Neighbourhood Plan. Apart from our general support, we have made a few comments in the appropriate sections. As a group that is keenly aware of the adverse impacts of climate change and biodiversity loss, we know that alongside our own work within the parish, collaborative effort with neighbouring parishes will benefit the wildlife and green spaces that we all enjoy in the long term.

**Plan section: Structure of the neighbourhood plan**

<b>Respondent</b>	<b>Comment</b>
The LANCE Trust	Many of those that have been involved in the creation of the LANCE Trust have enjoyed visiting key areas within Wraxall and Failand for several decades. And we know, from the hundreds of

	<p>residents both young and old that we engage with, that many residents of Long Ashton would acknowledge that we all benefit from the Tyntesfield Estate, the exciting and progressive nature recovery work at Watercress Farm and the network of footpaths in Lower Failand and elsewhere. As a result, we can appreciate that Wraxall and Failand are popular places in which to live and are supportive that the NDP seeks to protect and enhance the existing, important character of both places.</p>
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**Plan section: Statutory and supporting documents**

<b>Respondent</b>	<b>Comment</b>
Failand Table Tennis Club	<p>Again, my apologies for lateness of response. I have noted the lists of individuals and organisations that have been consulted and we would like to be included in going forward. The Club has been in existence for 70 years based in the village and we see ourselves very much part of the community.</p>

**Plan section: About Wraxall & Failand Neighbourhood Plan Area**

<b>Respondent</b>	<b>Comment</b>
KRG22	<p>I would like to add my complete agreement to the comments under this section and if I may make an additional point. What makes this area special includes the number of mature trees, many in the vicinity of The Elms where I live were kept as part of the development and others in the Parish add to its identity. I am however concerned that there has been insufficient identification and protection of these trees, in particular I reference the Lodge Lane property known as Lydcott where numerous large mature trees have been cut down by a developer, ahead of planning permission being sought, completely changing the pleasant semi rural nature of this part of Lodge Lane. I think WFPC should address the safeguards they have already in place or if not, what they propose. I am aware that Lydcott falls on the Nailsea side of Lodge Lane nevertheless the point remains valid.</p>
Chris Jepson	<p>In 2.62 the plan refers to a children's play area to be constructed in Failand. This play area is complete and was opened in April 2023 and is very popular with local children and parents making the need for an improved road crossing all the more urgent.</p>
DR_Wraxall	<p>For clarity, it is considered that para 2.18 should be amended to read '(now Tyntesfield Registered Park and Garden (RPG), see paragraph 2.54 below for explanation)', as this is the first instance of the abbreviation.</p>
Dwara	<p>I would like to endorse the observation in the Neighbourhood Plan that people live in this Parish because of its green and rural nature, and abundance of green spaces. Also that visitors come here to enjoy that green, rural environment and benefit from it. It is a health-giving place to live and to visit, and the rural nature of the Parish is what draws people to it. Bristol is such a short distance away and, yet Bristol residents are also able to gain these benefits after a relatively short drive.</p>

	<p>Connectivity in the Parish is a problem - the mobile telephone signal is dreadful for large parts of Failand, and the bus service is very limited in Wraxall, and especially in Failand.</p> <p>An hourly bus service between Bristol and Clevedon, ending at 7pm, along a busy B3128 with no safe crossings to bus stops makes this sustainable form of transport a very limited option and is particularly bad for children and the elderly. Similarly, there is no bus serve between Failand and Wraxall, or Nailsea or Long Ashton.</p>
Failand Table Tennis Club	<p>Paragraph 2.13 should include Sandy lane and Failand Lane as access roads to Lower Failand. Paragraph 2.34 should include "Failand Table Tennis Club is located in Sandy Lane opposite Failand Church". Paragraph 2.42 should state "in Hall in Lower Failand opposite Failand Church" - this will avoid any confusion with the Village Hall in Upper Failand. Paragraph 2.50 should say "a Hall opposite St Bartholomews Church and is the home of Failand Table Tennis Club".</p>
J McLaren	<p>We are a family with young children living in the Failand Triangle. It is fantastic that the playground at the village hall has now been completed, many thanks to all that were involved with achieving this. It is great to hear that a pedestrian crossing along the B3128 is being pursued. We would suggest that a reduction in the speed limit from 40 to 30 on all sides of the triangle is essential for the safety of all residents as well. Trips to the village hall and the Ashton Hill Plantation currently have to be carefully managed with our young children and is very difficult with bikes. We will often take our car to these locations just to avoid walking along the roads around the triangle.</p>
PJE	<p>The integrity of the Wraxall and Failand Neighbourhood is very much dependent on maintaining the green open spaces and the Green Belt. Any largescale intrusion into the Green Belt with housing development would be hugely detrimental to the well being of the Neighbourhood and the people residing in it</p> <p>Biodiversity would be negatively impacted. In particular the Yeo Valley is an area of great biodiversity and historic remains which should be protected for current residents and future generations. With the introduction on Net Biodiversity Gain the government recognises that this is an area of increasing importance and the Neighbourhood plan has my full support if one of the major aims is to support and increase the biodiversity in the Neighbourhood area.</p> <p>Furthermore the communication links within the Neighbourhood are unsuitable for increased traffic particularly the Bristol Road which is not wide enough in a number of places to support passing traffic.</p>
Belmont Estate	<p>It is the Belmont Estate, not the Belmont Trust Activities are not centred around the Carriage House but take place at various parts of the estate including particularly the re-wilded and new created wetlands at Watercress Farm</p>

Jessica	<p>The process for the development of the plan has been well thought through and well executed by the group of councillors and residents who have managed this work. It's a solid plan that accurately describes the parish and reflects my views as a resident.</p> <p>I personally am not against development as I think we have to support a need for increased housing stock, which includes a mix of types of residences. But it is so important to protect the green spaces in the parish because that is part of the character of this place and connected to so many important aspects, not least reversing ecological decline and supporting residents' mental health.</p> <p>The land areas described in this plan as green spaces are actively used by residents of this parish, as well as those from neighbouring areas and I feel it is very important to keep them as they are - with potential improvements in terms of access access connectivity between them, as has been done with the "walk to school" path.</p>
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#### Plan section Introduction

<b>Respondent</b>	<b>Comment</b>
Exolum Pipeline Systems Ltd	Thank you for your email to Exolum Pipeline System Ltd regarding the above. Please find attached a plan of our client's apparatus. We would ask that you contact us if any works are in the vicinity of the Exolum pipeline or alternatively go to <a href="http://www.lsbud.co.uk">www.lsbud.co.uk</a> , our free online enquiry service.
Natural England	Natural England does not have any specific comments on this draft neighbourhood plan.
National Highways	<p>Thank you for providing National Highways with the opportunity to comment on the submission draft of the Wraxall and Failand Neighbourhood Plan. We are responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance consists of the M5 motorway which runs approximately 350m north west of the Plan area boundary. Based on a review of our records we do not appear to have been previously consulted on the draft Plan.</p> <p>Following our review of the submission draft we are satisfied that the proposed policies within the Plan are unlikely to result in development which will adversely impact the SRN and we therefore have no specific comments to make. This does not however prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.</p>
The Coal Authority	The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

	<p>Our records indicate that within the identified Neighbourhood Plan area there are recorded coal mining features present at surface and shallow depth including: mine entries and shallow coal workings. These features may pose a risk to surface stability and public safety.</p> <p>Where coal mining features are present within an area and new development is proposed consideration should be given to the risks posed by these features and what measures are necessary to ensure the safety and stability of the development.</p> <p>It is noted that the Neighbourhood Plan does not appear to allocate any sites for future development and on this basis the Planning team at the Coal Authority have no specific comments to make.</p>
Historic England	<p>Thank you for your Regulation 16 consultation on the submitted version of the Wraxall and Failand Neighbourhood Plan.</p> <p>I can confirm that there are no issues associated with the Plan's policies and proposals upon which we wish to comment. We would reiterate the observation made previously to your authority in response to the associated SEA Screening consultation that we have not received a Regulation 14 consultation from the community (see attached). We also attach a copy of early liaison we had with the community on the preparation of its Plan.</p>

<b>Plan section: National Planning Policy Framework</b>
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<b>Respondent</b>	<b>Comment</b>
<p>The Trustees of Captain WDM Wills New Grandchildren's Settlement, C/o Savills</p>	<p>Neighbourhood Plan to proceed to a referendum, the Examiner must consider whether it meets a set of 'basic conditions', including that of being in general conformity with the relevant Development Plan.</p> <p>Criterion 'e' of the basic conditions requires that neighbourhood plans should be in general conformity with the strategic policies contained in the adopted development plan for the area. For the reasons specified above, the draft NDP is not considered to be positively prepared or sufficiently aspirational, conflicting with the core principles of the NPPF and as such its evidence base (or absence of) and policies do not accord with the Basic Conditions set out in the Town and Country Planning Act 1990 (as amended). In our view the draft NDP and its evidence base does not currently provide an accurate basis upon which to proceed to Independent Examination.</p> <p>We consider that a modest green belt release will enable local housing needs to be met, and the Land north of Clevedon Road, Failand is suitable, available, deliverable and developable, and is well-related to the existing village. The land largely is free from any significant environmental constraints and is capable of</p>

	<p>accommodating a small-scale residential scheme in order to meet an identified need and demand for housing in the village.</p> <p>See additional information in attached document.</p>
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**Plan section: Vision**

<b>Respondent</b>	<b>Comment</b>
Failand Table Tennis Club	Failand Table Tennis Club fully supports this vision.
Long Ashton Parish Council	Long Ashton Parish Council particularly endorses the vision that Wraxall and Failand will continue to seek protection and enhancement of the area's rural character, maintaining and improving access to the Green Belt to promote healthy lifestyles, and bringing the community together through the provision and improvement of local services and engagement with local residents. Plus, of course, the commitment to build on your existing distinctiveness to deliver the type of places that allow people of all backgrounds to live, play and work peacefully in the Parish
The LANCE Trust	Bearing in mind the aims of our charity, the LANCE Trust supports the NDP's wish to protect and enhance the area's rural character as well as maintaining and improving access to the Green Belt to promote healthy lifestyles and we would hope that with the rich mosaic of wildlife and habitats within your parish will, during the course of this plan, raise awareness of the importance of conserving and maintaining healthy ecosystems rich in wildlife to help mitigate the adverse impacts of climate change and biodiversity loss.

**Plan section: Objectives**

<b>Respondent</b>	<b>Comment</b>
Richardb	Agree with these objectives
Chris Jepson	Objectives 1 and 2 do not seem to be complete with the words "Belt' and 'spaces' missing
Dwara	<p>I presume that point 1. and post 2. read Green Belt and green spaces respectively.</p> <p>I cannot emphasise strongly enough the importance of both the Green Belt and Local Green Spaces to the quality of life of both residents of the parish and visitors to the parish. The fundamental character of the parish would be changed if the Green Belt is not protected, and if green spaces are not preserved and enhanced for the benefit of wildlife, human residents and visitors.</p>

**Plan section: Policy WF1: Community Facilities**

<b>Respondent</b>	<b>Comment</b>
Failand Table Tennis Club	We would request that Failand Table Tennis Club is included in the list in Policy WF1. Failand Table Tennis Club is very keen to enhance its facilities to the benefit of the community. Re: Para



	5.3 - Failand Table Tennis Club should be highlighted on Inset Map1 in Appendix B.
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**Plan section: WF2 Local Green Space**

<b>Respondent</b>	<b>Comment</b>
KRG22	As a regular user of The Elms open space I would like to confirm that this space is indeed of great value to residents and should be afforded protection.
Chris Jepson	I would support the inclusion of all the green spaces identified and would support additional green spaces to added to this list where appropriate to conserve the green and rural nature of Wraxall and Failand
DR_Wraxall	I strongly support Policy WF2, particularly for the 'The Elms Open Space' area, which is used extensively by residents from Wraxall and Nailsea for recreation and exercise. I believe that the Local Green Space Assessment for this area provides good justification for this area. However, I believe that it is important to retain the Scheduled Ancient Monument designation for the remains of Prideaux Colliery and the nearby earthworks (MNS1077 and MNS1988 on the Heritage Record).
Dwara	Again, I would like to emphasise that this policy is crucially important to the character of the parish.
J McLaren	The importance of the Wraxhall Piece woodland to local residents cannot be overstated, as stated inappropriate development in this area should be resisted/refused.
The LANCE Trust	As recent reports show, species within Britain continue to decline with increasing numbers of birds, insects and mammals facing the threat of extinction. We'd urge key stakeholders of Local Green Space to look at how best to accommodate more ways of encouraging biodiversity with, for example, a focus on pollinators. Many insects are pollinators - not just honeybees - and many of our native bees need much help to survive. Alongside, moths, butterflies and other insects, they provide a foundation on which amphibian, mammal and bird life can thrive

**Plan section: Policy WF3: Community Cohesion**

<b>Respondent</b>	<b>Comment</b>
Richardb	I believe that there should be a policy to preserve the character of existing development. This is particularly needed in the Failand triangle where the doubling of height of residential dwellings under "permitted development" rules would an area predominantly of bungalows would become essentially urban.
Rachel Sandeman	I support the point in policy WF2 that inappropriate development should be resisted. I think it unlikely that any development proposal for The Elms Green Space would in any way enhance the beneficial use of the Green Space.  -It would be very detrimental to wildlife there. The area is on a flood plain and during lockdown, there were otters present there. The Local Wildlife Site and Site of Conservation Interest straddles the eastern boundary as noted in the Local

	<p>Green Space Assessment (May 2023).</p> <p>-It is an open space that people use to walk their dogs and exercise which is well used.</p> <p>-The Green Space gives this part of Wraxall a pleasant rural outlook as you drive up to the village. Any development would likely be right up against the fence, giving the feel that this part of Wraxall is actually a town, not a village.</p> <p>-As noted in the Local Green Space Assessment (May 2023), there is a scheduled ancient monument (old colliery) located in the east of the area.</p>
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**Plan section: WF:4 Walking Cycling and Wheeling Networks**

<b>Respondent</b>	<b>Comment</b>
KRG22	Point 5.24 concerning Lodge Lane being "increasingly busy". As I live very close to Lodge Lane I would like to point out that traffic volumes increased markedly when the traffic calming measures were installed on Station Road Backwell. When that road was closed for the works to install the horrendous speed bumps we immediately noticed more cars on Lodge Lane and that has continued to be the case. It is the law of unintended consequences that an action taken in one place to reduce traffic speeds means that another route is adversely impacted. An action needs to be recorded to similarly add some traffic calming to Lodge Lane especially at the point where Festival Way / Green Pastures Road Bridleway cross Lodge Lane.
Chris Jepson	The absence of safe walking routes (ie that can be walked at night or alone) from Failand to Long Ashton and Bristol has not been addressed
DR_Wraxall	The NSC <i>Rural Lanes Action Plan</i> suggests that speed reduction of 20 mph should be considered for rural villages and the NSC <i>Safer Active Routes to School Action Plan</i> also recommends a 20 mph speed limit. The Parish Council has previously advocated that Quiet Lanes be considered on rural roads that form part of the National Cycle Network and, when consulted on the improvements to be implemented for Active Travel on the Festival Way, it has lobbied for a reduction in the speed limit on Lodge Lane in order to improve road safety.
Dwara	The main concern for most residents is the speed of the traffic along the B3128 and B3130, sometimes also the B3129. The current speed limits are simply too fast for rural villages and greatly limit pedestrian use. This is bad for the climate and also for human health and fitness.
Tamsin Rossiter	Ref: The B3130: The volume and speed of traffic on this road has increased significantly in recent years - including various 2 and 4 wheeled vehicles that use it at VERY significant speed. Even the 'every day' traffic causes issues of noise and danger for residents and those whose properties lie on or near the road. There is also considerable and material detrimental impact on internationally significant bat populations (greater and lesser Horseshoe) through increased noise and light pollution (principally noise) in this North Somerset & Mendip Bats Special

	<p>Area of Conservation (SAC). All of this has been measurably exacerbated by the recent low cost surface dressing application. The volume of traffic should be limited, the speed reduced and the road properly surfaced with quiet tarmac to protect not just the quiet enjoyment of the countryside but also the biodiversity and protected species.</p> <p>Ref: Belmont Hill: The speed limit of 50mph remains too high and should be reduced. Cars continue to leave the road, through walls and into fields. Heavy goods vehicles continue to abuse the restrictions and the cars' speed and behaviour is a danger to cyclists</p>
David C Neale	<p>I am responding to Policy WF4 of the Plan which ends with the statement:</p> <p>"Development proposals will be supported where new or enhanced walking, cycling and wheeling connections will be delivered."</p> <p>My response concerns mainly the lack of safe cycling access to "National Trust Tyntesfield".</p> <p>I recently attended a lecture by Tyntesfield's Head Gardener Paul Evans. Evidently car parking is insufficient at times of peak tourism, when the upper (north) entrance has to be closed to private cars. This results in hazardous fly- parking on the verges and carriageway of the B3128 Clevedon Road. Steps could be taken to prohibit fly parking, but I think it is clearly necessary to promote the development of attractive walking and cycling routes to the Visitor Centre from routes 33 and 334 of the National Cycle Network illustrated on page 82 of the Plan.</p> <p>I attach my network drawing SC375B and Token Estimates, both of which are known to NSC's Sustainable Transport Group and Sustrans.</p> <p>Of the 6 suggested route Options, my preference is for Routes U and W, although there is room for discussion. I suggest inclusion of both plans in the final Neighbourhood Plan in support of the basic concept.</p>

**Plan section: WF5: Traffic and Transport**

<b>Respondent</b>	<b>Comment</b>
KRG22	<p>Since Tyntesfield was acquired by the National trust there has been no implementation of improved access to the estate from the very busy B3128. Despite the volumes of visitors this site attracts, visitors arriving from the M5 have to negotiate a difficult right turn from Portbury lane and then turn off the B3128 into a single width drive. Some who can't be bothered with the car park just park dangerously on the B3128.</p> <p>Action plan is needed for WFPC to raise with NT and Highways to get improved access to this site which should have been mandated at the outset of NT opening to the public.</p>

Dwara	Major development in this parish would impact hugely on the already busy access roads to Bristol, increasing the volume of traffic significantly, and increasing traffic jams on the roads as they near the city.
J McLaren	The volume, speed and type (large lorries to and from the quarry) of traffic along the B3128 is already problematic. Any development that could adversely impact on highway safety or increase traffic issues should be resisted.
Belmont Estate	Ref 5.28: The B3130: The volume and speed of traffic on this road has increased significantly in recent years - including various 2 and 4 wheeled vehicles that use it at VERY significant speed. Even the 'every day' traffic causes issues of noise and danger for residents and those whose properties lie on or near the road. There is also considerable and material detrimental impact on internationally significant bat populations (greater and lesser Horseshoe) through increased noise and light pollution (principally noise) in this North Somerset & Mendip Bats Special Area of Conservation (SAC). All of this has been measurably exacerbated by the recent low cost surface dressing application. The volume of traffic should be limited, the speed reduced and the road properly surfaced with quiet tarmac to protect not just the quiet enjoyment of the countryside but also the biodiversity and protected species.

**Plan section WF7: Planning for Green Infrastructure, Biodiversity and Food Production**

<b>Respondent</b>	<b>Comment</b>
Long Ashton Parish Council	Long Ashton Parish Council fully supports your aim to implement measures to retain and improve connections between green spaces, wildlife corridors and habitats such as those within Sites of Nature Conservation Interest. Our Parish Council is currently working on its Local Nature Recovery Plan so we are very aware that it's important to work with adjacent parishes to ensure the best outcome for locally rare species and habit conservation. Perhaps you could add something along these lines? And maybe worth stating that as a parish, you recognise that the climate and biodiversity crises are accelerating with variable weather patterns becoming more common and with many species continuing to decline in both number and variety. Maybe add that as a vital component of North Somerset, you are aware that these trends must be stabilised and, during the course of this Local Plan, reversed in order to protect the younger generation to come
The LANCE Trust	The LANCE Trust welcomes the proposal to 'protect and enhance biodiversity'. In May 2023, Defra issued guidance on how local authorities could comply with their biodiversity duty as outlined in the Environment Act 2021. As a result, the LANCE Trust is currently helping Long Ashton Parish Council develop its Local Nature Recovery Plan and Local Climate Action Plan with the first list of objectives scheduled for January 2024 as required by DEFRA. Local nature recovery strategies, species conservation strategies and protected site strategies are all under consideration. Perhaps there could be scope for both parishes/wards to work together to help species such as the red-

	<p>listed swifts, redwings, tawny owls and many others recover their numbers during the duration of this NDP. Wildlife species move freely through the valleys, fields and woods so some degree of collaboration, sharing of knowledge and expertise could help us all</p>
Environment Agency	<p>Thank you for consulting the Environment Agency regarding the above Wraxall and Failand Neighbourhood Plan. The Environment Agency's comments remain as set out in previous correspondence dated 30 January 2023. Please see attached.</p> <p>It is noted that the NP concludes that there are no major development sites allocated within the plan area. We support the promotion of opportunities for greenspaces for biodiversity and integrated drainage infrastructure as encouraged within Policy WF7: Planning for Green Infrastructure, Biodiversity and Food Production.</p> <p>These provide multi-functional benefits for biodiversity, flood alleviation, Sustainable Drainage Systems (SuDS) water quality and recreation.</p> <p>Considered should be given to a connected network across the NP area, especially in flood plains. This will allow floodplains to be better connected and increase green spaces for people and wildlife.</p>

<b>Plan section WF9: Building Design and Sustainability</b>
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<b>Respondent</b>	<b>Comment</b>
Environment Agency	We support the inclusion within Policy WF9: Building Design and Sustainability and especially "avoiding areas at risk of all forms of flooding."

<b>Plan section When is a review required?</b>
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<b>Respondent</b>	<b>Comment</b>
Nailsea Town Council	<p>Nailsea Town Council comments that the Wraxall and Failand Parish Plan makes no mention of the provision of housing within the plan.</p> <p>The land to the North of Nailsea (situated within the parish of Wraxall) is the most suitable location for low cost/affordable housing. The Town Council acknowledges that this is within the greenbelt and that this is unlikely to change unless there is exceptional circumstances. However this site could be developed to improve ingress and egress to the Southfield Road Industrial Estate, removing the need for vehicles to come out through The Willows and the centre of Nailsea and onwards towards Wraxall via Wraxall House. Developing the land to the North of Nailsea would allow for not only affordable housing and a new road taking traffic away from the Town Centre but could provide additional employment and recreational/sports opportunities too.</p>

**Plan section: Potential Scope of future review**

<b>Respondent</b>	<b>Comment</b>
Dwara	I think that creating a design code in the future review of the Neighbourhood Plan should be a priority - as mentioned above, recent redevelopments within Failand are altering it very significantly, and detracting from its rural character.
Failand Table Tennis Club	Paragraph 6.10 - just wondering how the Lower Failand community fit into this???

**Plan section: Map A.3 Key Services and Employment**

<b>Respondent</b>	<b>Comment</b>
Failand Table Tennis Club	The notation "Lower Failand Village Hall" should be changed to "Failand Table Tennis Club" as this brings consistency with other sporting notations such as the cricket and golf clubs.

**Plan section: Inset Map 1**

<b>Respondent</b>	<b>Comment</b>
Failand Table Tennis Club	As noted in WF1 Policy above - the Hall opposite Failand Church should be highlighted in blue and referenced as "Failand Table Tennis Club"

**Plan section: National Cycle Network**

<b>Respondent</b>	<b>Comment</b>
HC90	I would appreciate safer commuting from Wraxall and Failand to Clifton, Long Ashton, and Bristol. A footpath and/or cycle path along beggar bush lane in particular would be amazing. Both villages feel quite isolated without a car, especially with children (cycling on the main road with children is not possible)
Peter	There's a general lack of consideration to cyclists in the plan. The topography of the planning area whilst not favourable to commuting cyclists isn't a real barrier to using this form of transport, not when considering the advances in electric bikes. The principle issues as a daily commuter cyclist living in Lower Failand are the speed and lack of dedicated cycle lanes on the Clevedon and beggar bush lane roads, both key routes connecting Bristol. A plan with ambitions and time horizon over the near 3-5 year term should seek to address these roads limitations.

**Plan section: Wraxall and Failand Parish Council Traffic Flow Report April 2022**

<b>Respondent</b>	<b>Comment</b>
KRG22	I agree entirely with the point made (4) re Unintended Road Pinch Points with regard to Lodge Lane which I use daily. It is an accident waiting to happen because vehicles are allowed to park on the blind brow of a now very busy stretch of road. 23 years ago it wasn't much of a problem but recently leaving The Elms estate for the B3130 means a daily dice with head on oncoming traffic.

	The solution is simple and cheap, apply double yellow lines for the 50m of road at the brow of the hill. Please carry this forward to point 7 Actions Going Forward, it should be an easy fix.
Dwara	<p>Although traffic speed monitoring demonstrates that most of the through traffic does not exceed the speed limit, the passing traffic nonetheless makes walking along the B roads in the Parish very unpleasant. Passing lorries and buses create a significant draught, and the general sensation of traffic whizzing past deters most people from walking along these roads.</p> <p>For example, most parents drive their children to the Failand village hall (where the Parish council has, at the time of writing, already realised its aspiration and built a very popular playground). This fails to encourage children to walk but the traffic speed and noise, along with the lack of a pedestrian crossing, makes it a completely understandable choice. Similarly, it is deeply unpleasant and precarious for the elderly and disabled.</p>
Long Ashton Parish Council	North Somerset's Emerging Local Plan has removed Woodspring Golf Course: 2,500 dwelling from the current proposals making their way through North Somerset's planning process
The LANCE Trust	Suggest removing Woodspring Golf Course since the LANCE Trust believes NSC has withdrawn this site for consideration.

#### Plan section: Local Green Space Schedule

Respondent	Comment
Matt	Strongly support the proposed LGS
HC90	This is great. Thank you. I particularly appreciate the protection of Wraxall Piece Woods.
Peter Andresen	<p>I agree with the green space schedule but it's a shame that there are not more areas for wildlife and public spaces in the schedule. I assume that this is because other candidates are privately owned.</p> <p>Section W7 discusses green infrastructure but is rather vague in its wording. I would have liked to have seen more concrete conclusions as to what will be done and where.</p>

#### Plan section: Do you have any other comments on the Neighbourhood Plan?

Respondent	Comment
Chablis Wolff	I believe this Neighbourhood Plan has set out a very reasonable vision for our green spaces and the surrounding green belt. The authors have considered the uses of the spaces and their proximity to settlements carefully. The preservations of these spaces are essential to maintain our landscape and future proof our parish against global warming. This plan ensures this will be achievable for further generations.
Aleyna	As a resident of 25 years, we moved here in the knowledge that the green belt restricted growth around Failand, giving us good access to green space to walk and enjoy nature. The village shop, pub and hall were also key to our decision to live here. I

	<p>feel that it is important to keep a variety of housing in Failand, particularly including bungalows. The disruption during the last 18 month on Belmont Drive has been dreadful as 8 dwellings have had major works carried out. More vehicles are parked on the street preventing access and in this era of inclusivity, bungalows make appropriate housing available to residents of all ages. I feel that it is an issue that developers do not always follow the rules, for example of permitted development, turning a bungalow into a house in the knowledge that they can add windows in places outside the permitted development rules and not have to make it good when it is brought to official notice.</p> <p>Traffic is heavier and a more prolonged rush hour is developing on the three roads around the Failand triangle. This includes early morning airport runs from the motorway and traffic climbing and descending Belmont Hill to &amp; from Nailsea and Backwell, heading for the motorway junction. Increasing the number of dwellings owning multiple cars will not improve the traffic situation.</p>
M.Wolff	<p>I am surprised once again. The council are having a consultation about building on green space. And initiating a policy statement. I do understand that this will restrict developers from building on valuable green space. What also surprises me that they would even consider in doing such criminal activity.</p> <p>I'm not sure if the council and the perspective developers have been watching our green planet on BBC. And the passion that David Attenborough and the viewers that watch the show and the majority of the population in the UK believe in our green space. And please no more further development.</p> <p>It might be considered by the council and the developers that there is a 35% occupancy in offices in London and the surrounding areas. Now that people's working practices have changed, there is a less demand for officers. It is time that all the councils communicate with each other and discuss how best to move forward on this issue.</p> <p>Developers do not want to come develop on brownfield sights as the costs are much higher than when they just come bulldoze somebody's field.</p> <p>It is about time the developers and the council work together so we can make our inner cities full of good accommodation and also consideration to bring in green space. This means that some buildings built post war come down and community greenspace could be put in place.</p> <p>By making maximum development in the inner cities, it allows then the green space to remain . The people can catch buses and enjoy walks looking at the trees and the fields and wildlife. Not some ghastly houses built with solar panels on top. Cemented driveways and minimal gardens. I'm really do not believe that is what anybody wants Left to our children's children.</p>



Anonymous parishioner	The Neighbourhood Plan is so important for our Parish and forms a fundamental part of the planning system for years to come. What is especially important is the protection of Local Green Spaces within our parish, which are used by all to walk, exercise and general well being.
SJ	Having read in detail the document I am very supportive especially in terms of the local green space e.g. on the edge of the Elms . As a protected open space for all to use
Joy	It was fascinating to read this document and see the detailed work that has gone into its preparation. As a resident of Failand, I wanted to reiterate the sentiment of all Failand residents who want to do all they can to protect the Green Belt of this much valued part of North Somerset. The growing need of our society to be able to have the opportunity to be immersed in nature or even simply to see these green spaces is just one of the many reasons why this Neighbourhood plan is so important. We owe the Green Spaces to our children and their children as a protection for the mind, body and soul.
DR_Wraxall	The vision and objectives and the NP policies are supported, particularly Policy WF2 Local Green Space.
Mr John Winstone	<p>I was unable to find any landscape assessment report. Such a study is necessary to guide any development proposals across landscapes and the identification of special landscape features. Such considerations usually include coutours for their implications on the impact of development, and sadly these are often deliberately disregarded by developers and their agents. Please prepare the study before the NP is fianlised.</p> <p>I was unable to find any list of locally listed heritage assets. It may be that these have not been completed for this neighbourhood plan area. Locally listed heritage assets are an important local criteria in any future development or local plan policy. Please ensure the local lists are commissioned before the NP is finalised.</p> <p>1. I was unable to find any list of SMR items. Please add these in an appendix to the NP.</p> <p>3A. It may be that the SMR is backing up due to staff shortages. Please add a note if this is the case, detailing the number of SMR items that have been made, but are still awaiting adoption.</p>
MW	<p>Think North Somerset has seen enough recent building. As currently seen cannot cope with rainfall as more and more flood plain is lost. The county cannot cope and already at risk of flooding (global warming which more building etc is contributing to)</p> <p>Erosion of natural habitat- many native species of wildlife are in serious decline due to destruction of their habitat such as hedgehogs for instance.</p> <p>Also not enough dentists and GPs - Bristol is short for instance. In essence it cannot cope with any more large increases.</p>

Failand Table Tennis Club	<p>We at Failand Table Tennis Club acknowledge this excellent document and all the hard work that has gone into its preparation. The Club has been in existence for 70 years and we are very keen to enhance our standing in the community. I again acknowledge that we have been very late in commenting on the proposed Plan and would welcome the opportunity to be more involved.</p>
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Appendix 2: Full consultation comments for additional Reg 16 consultation - 22  
January 2024 to 4 March 2024

**Plan section: About Wraxall & Failand Neighbourhood Plan Area**

<b>Respondent</b>	<b>Comment</b>
Harrow Estates	<p>Overall, Harrow welcomes the production of the Neighbourhood plan. It sets out positive and proactive steps for the future of the two villages within the Neighbourhood Plan Area. Harrow also believes that the Draft Neighbourhood Plan meets the basic conditions identified in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). As such, Harrow’s comments (as expressed below) focus on their proposals for strategic growth at Failand Triangle, which could help to deliver many of the Draft Neighbourhood Plan’s objectives and aspirations.</p> <p>Specifically, Harrow’s interest in the consultation relates to their ongoing promotion of three separate sites adjoining Failand Triangle. Together, these account for approximately 39.9 hectares (98.59 acres). Harrow considers this land suitable to accommodate strategic development, which will deliver new homes (including affordable homes), education facilities, green infrastructure, biodiversity net gain, public open space, and new pedestrian/cycle connections. These will be in addition to off-site upgrades to transport and other infrastructure.</p> <p>We trust that our comments are of assistance to NSC and Wraxall &amp; Failand Parish Council, and we are happy to discuss any of the representations made here.</p> <p>An emerging Illustrative Masterplan is presented in Appendix 1 to illustrate the proposals envisaged by Harrow. A Vision Document is provided in Appendix 2 to explain the proposals more fully.</p> <p>Failand Harrow makes no comments regarding the description of Failand, as set out in Section 2 of the Draft Neighbourhood Plan, as this is a factual statement that reflects the history of the settlement. However, Harrow does have the following observations:</p> <ul style="list-style-type: none"> <li>• The Draft Neighbourhood Plan identifies that services are limited (paragraph 31)</li> <li>• There is no primary school and limited play areas service Failand Triangle (paragraph 32)</li> <li>• Lower Failand is geographically distinct from Failand Triangle (paragraph 34)</li> </ul> <p>With respect to the above, Harrow has undertaken its own review of the services available at Failand Triangle and the surrounding area. Its emergent proposals are being developed to help address current shortfalls in provision. Indeed, a key benefit of a larger scale (but appropriately phased) strategic development at Failand Triangle will be the provision of a new primary school in conjunction with other community facilities and enhanced transport connections.</p>

	<p>The commentary under the heading ‘Neighbourhood Area’ (in paragraphs 2.65-2.66) also refers to ‘Development Pressure’. It explains that, whilst at the time of writing, no major development allocations have been identified within the Neighbourhood Plan Area (i.e., nothing has been proposed in the emergent Local Plan), North Somerset Council continues to face significant challenges in allocating and delivering sufficient levels of housing and employment growth.</p> <p>The Draft Neighbourhood Plan acknowledges that this context and future changes to planning policies could result in strategic growth within the Neighbourhood Plan Area. In paragraph 2.68, it is then explained that the Plan seeks to adopt a proactive approach. The document then sets out several policies intended to manage future large-scale development if this were to occur. Indeed, it is further acknowledged that this eventuality will trigger a need to review the Neighbourhood Plan.</p> <p>Harrow considers this approach a pragmatic and proportionate response to the prevailing planning context and the uncertainties described. Indeed, the Draft Neighbourhood Plan addresses the main strategic planning matter encountered locally. Namely, the document recognises that legitimate pressures for growth exist but also acknowledges that (because of the Green Belt designation) strategic development could only occur if enabled at the Local Plan level.</p> <p>In this environment, it is quite correct that the Neighbourhood Plan should introduce a framework to ensure that strategic growth (if it does occur) is shaped to meet local objectives and benefit existing as well as new residents. This approach is consistent with the National Planning Policy Framework (NPPF), in paragraph 16, which indicates that Plan-making should contribute to sustainable development and that Plans should be positively prepared.</p> <p>Harrow continues to welcome the opportunity to meet with Wraxall &amp; Failand Parish Council and North Somerset Council (NSC) to discuss the potential development opportunities at Failand Triangle. For appendices see attached document.</p>
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**Plan section: Vision**

<b>Respondent</b>	<b>Comment</b>
Harrow Estates	<p>Harrow supports the proposed Vision. Promoting healthy lifestyles, bringing the community together through providing and improving local services, and engaging with residents are all themes that find support within the NPPF. Likewise, Harrow agrees that there is a need for high-quality and locally distinctive design and to maintain and improve access to land within the Green Belt. The final sentence of the Vision also sets out a clear description of the kind of place Failand will have become by 2038, notably that it be an environment that allows “people of all backgrounds to live, play and work peacefully in the Parish”.</p> <p>Harrow believes there is a need for strategic growth at Failand Triangle to deliver on this Vision and its supporting objectives. Indeed, there is a real opportunity to improve the quality of life of existing residents and introduce</p>

	<p>new services to Failand Triangle in conjunction with providing new homes. This will include new affordable homes presently absent from the existing housing stock, rendering Failand Triangle a more inclusive and vibrant place.</p> <p>Harrow has also adopted (and is committed to) a placemaking approach in forming its emergent proposals for Failand Triangle. This has been articulated through its previous representations, Vision Document, and initial presentations to NSC and Wraxall &amp; Failand Parish Council. Harrow agrees that it is not enough to provide new homes. Instead, a sustainable expansion at Failand Triangle must deliver a package of infrastructure that enhances existing communities and makes the village a better place to live.</p> <p>Whilst Harrow's proposals are predicated on the release of areas of Green Belt land around the settlement, should this occur (through a future Local Plan), this will be in conjunction with the provision of new areas of publicly accessible parkland, recreational facilities, and open spaces. Indeed, securing compensatory improvements to the environmental quality and accessibility of remaining Green Belt land is an established planning principle, as set out in NPPF paragraph 142 and consistent with the Neighbourhood Plan's proposed vision.</p> <p>The third of the proposed objectives notes that should growth occur, this will need to be phased to ensure that infrastructure can be appropriately provided. Harrow is committed to maintaining an open dialogue with NSC and Wraxall &amp; Failand Parish Council, such that future strategic growth at Failand Triangle is designed from the outset to integrate with the existing community and contributes towards strategic and local infrastructure per relevant national and local planning policies, and guidance.</p>
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### Plan section: Objectives

Respondent	Comment
Hugh Pratt	<p>The Plan is to be encouraged as a green response to a green belt area.</p> <p>There are two issues which are not or inadequately addressed in this plan you are inspecting:</p> <ul style="list-style-type: none"> <li>• <u>Green energy</u></li> </ul> <p>It is recommended that the Inspector allows: " 'great weight' to be granted to the creation of green energy, especially novel methods"</p> <p><u>Rationale</u>: We have a National Energy crisis and Wraxall &amp; Failand must play their part for the common good.</p> <ul style="list-style-type: none"> <li>• <u>Local landscape</u></li> </ul> <p>Para 4.3 Objectives #4 "Encourage high quality and locally distinctive design which blends with the local vernacular rather than competing."</p> <p>It is recommended that the Inspector clarifies objectives #4:" "Encourage high quality and distinctive designs" <u>Rationale</u>: The existing definition is unworkable and a romantic error.</p> <p>The existing landscape character and vernacular of the settlement is " filled</p>

	<p>with a mixture of various developments of various styles and settings. See the pictures of some of developments in and adjacent and in direct visual connection to Tyntesfield House. How do you blend with Tyntesfield House and South Lodge?</p> <p>For images and Parish Plan see attachment.</p>
Sport England	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.</p> <p>Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</a></p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting</p>

provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section:  
<https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance:  
<https://www.sportengland.org/activedesign>

*(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)*

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<b>Plan section: Policy WF1: Community Facilities</b>
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<b>Respondent</b>	<b>Comment</b>
Harrow Estates	<p>Policy WF1 seeks the protection of community facilities and includes a list of facilities to be protected. The draft policy also supports proposals that provide services and facilities for young people. It is noted that the draft policy also states:</p> <p><i>“Proposals which make provision for services and facilities for young people, in particular, recreation, sport, informal leisure and youth club provision, and those which would provide new or improved local services, will be supported.</i></p> <p><i>Schemes to increase the recreation and play on offer for all ages of children and young people at the Failand Village Hall and Millennium Green will also be supported.”</i></p> <p>Harrow supports draft Policy WF1, which is consistent with NPPF paragraph 93. Harrow can confirm that its proposals for Failand will not harm any existing community assets in the settlement. These include the Failand Inn and Failand Village Hall, located on the northwestern side of Failand Triangle, adjoining the promoted land. Indeed, Harrow’s proposals provide a clear opportunity to provide better linkages to enhance accessibility to these community facilities.</p> <p>With the benefit of future discussions with the Parish Council, Harrow will also seek to bring forward additional community facilities, as may be required. This will include substantial open space provision, community parks, activity zones and play provision. There is also the potential to enlarge or replace the existing village hall and scope to bring forward a primary school at the settlement.</p>

<b>Plan section: WF2 Local Green Space</b>
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<b>Respondent</b>	<b>Comment</b>
Wain Homes (Severn Valley) Limited	<p>On behalf of our client, Wain Homes (Severn Valley) Ltd (WHSV), I set out below comments in response to the consultation on the Regulation 16 version of the Wraxall and Failand Neighbourhood Plan (WFNP).</p> <p>Previously, Blue Fox Planning Ltd submitted comments in response to the Regulation 14 consultation, identified as ‘Comment ID 40’ within the WFNP Consultation Statement (May 2023).</p> <p>Our comments are focused specifically on land controlled by WHSV, circa 28 hectares, adjoining the north-eastern edge of Nailsea, to the south of the B3130, Bristol Road. This land is identified in the North Somerset District Council Strategic Housing Land Availability Assessment (Site Ref: HE20223). To assist in identifying this land, we include a site location plan as an appendix to our comments.</p> <p>The Regulation 16 WFNP proposes to designate land which includes land controlled by WHSV as a Local Green Space (LGS) through emerging Policy WF2, specifically ‘The Elms Open Space’. The extent of the proposed Elms Open Space LGS is presented at Inset Map 7 to the Reg</p>



16 WFNP. Land controlled by WHSV and the proposed Elms Open Space LGS is shown at Appendix 1 to these representations.

This Regulation 16 consultation is concerned with the compliance of the WFNP in respect of the Basic Conditions.

The North Somerset District Council Executive Committee held on the 6th September 2023 concluded that the WFNP satisfies the necessary conditions, in accordance with Schedule 4B of the 1990 Town and Country Planning Act (as amended).

For reasons set out in our comments below, we do not agree that the Basic Conditions have been satisfied and in light of these comments, the examination of the WFNP must provide for appropriate opportunities for our position to be discussed.

The Planning Practice Guidance expects the examination of a draft Neighbourhood Plan to be conducted via written representations. However, where an examiner considers it necessary to ensure adequate examination of an issue, or to give a person a fair chance to put a case, they must hold a hearing to listen to the oral representations about a particular issue.

Given the nature of our representations to this Regulation 16 consultation, we consider that is necessary and fair to request that a hearing is held in order to make oral representations.

The Basic Conditions are summarised below:

1. A plan must have appropriate regard to national policy and advice;
2. Have special regard to the desirability of preserving any listed buildings or its setting;
3. Have special regard to the desirability of preserving or enhancing the character or appearance of any conservation area;
4. Contribute to the achievement of sustainable development;
5. Be prepared in general conformity with the strategic policies contained in the development plan;
6. Should not breach and is otherwise compatible with, EU obligations; and,
7. Prescribed conditions are met and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

The WFNP Basic Conditions Statement considers policies contained within the plan against each of the basic conditions. In respect of having regard to national policy and advice (A), Table 1 of the Basic Conditions Statement lists each policy, alongside the 'key' NPPF paragraphs, providing a summary of how regard has been had to those paragraphs identified.

For WFNP Policy WF2 (Local Green Space), the Basic Conditions Statement lists paragraphs, 101, 102, 103, and 147-151 of the NPPF and concludes:

"The NPPF supports the communities identifying and protecting green areas of particular importance to them as Local Green Space. Consistent with the NPPF the policy for managing the local green space is consistent with those for Green Belts."

The national Planning Practice Guidance<sup>1</sup> (PPG) requires that if land is already protected by Green Belt policy, then consideration should be given to whether any additional local benefit would be gained by designation as LGS. The PPG does recognise that LGS could provide potential benefits where protection from development is the norm, but where there could be exceptions, by identifying areas that are of 'particular importance to the local community.'<sup>2</sup>

In the context of the specific LGS proposed at the 'Elms Open Space' it should be noted that this land is located within the designated Green Belt. We explain below that there is no obvious rationale as to what, if WF2 is consistent with the Green Belt and the protections and requirements for the management of these spaces provided by this designation, additional protection the proposed LGS would provide.

Paragraph 101 of the NPPF allows local communities to designate land as LGS where these areas are of particular importance to them. There is therefore a requirement for areas which are proposed to be designated as LGS, to have a demonstrable and clearly identified importance to the local community it serves.

Paragraph 3.4 of the Consultation Statement explains that:

Given the significant extent of Green Belt it was considered that identification of Local Green Space Designations was important to help differentiate areas that are of particular importance to the local community for reasons other than those associated with the Green Belt. (Our emphasis)

<sup>1</sup> Planning Practice Guidance – Paragraph: 010 Reference ID: 37-010-20140306 Rev Date 06.03.2014

<sup>2</sup> Planning Practice Guidance – Paragraph: 010 Reference ID: 37-010-20140306 Rev Date 06.03.2014

It is therefore the case that the LGS designation is premised on factors, i.e. matters of particular importance, which differentiate this land from the strategic protection provided by the Green Belt designation. In this context it is noted that paragraph 3.5 of the Consultation Statement goes on to explain that:

Identification and designation of Local Green Spaces where appropriate was therefore considered to be an important role for the Neighbourhood Plan; providing locally specific policies for sites that differentiate it from the wider Bristol Green Belt. This approach is considered consistent with the North Somerset's adopted Local Plan, which already identifies a number of Local Green Space designations within the Green Belt. (Our emphasis)

Reference to other LGS designations also includes land at the southern extent of the Elms Open Space LGS which is an existing LGS designation (Land North of Vowles Close). The extent of this area was considered during its designation process and this did not extend further north. Furthermore, the justification for the Vowles Close LGS did not consider that a wider geographical area was either necessary or appropriate, or that there were any locally specifically policies that differentiate such land from

the wider Bristol Green Belt that would justify any extended area to form part of the LGS.

Therefore, the approach and justification for the LGS as now proposed within the WFNP (Elms Open Space) is inconsistent with that which informed the designation of the Vowles Close LGS.

In this context it is necessary to consider paragraph 102 the NPPF which confirms that a LGS designation should only be used where the green space is:

1. in reasonably close proximity to the community it serves;
1. demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and
2. local in character and is not an extensive tract of

Our comments are focused predominantly on b), and the requirement for the WFNP to demonstrate with sufficient clarity and evidence that the LGS is demonstrably special to the local community and holds a particular local significance. We do however also set out brief representations in respect of a) and c) below.

**a). in reasonably close proximity to the community it serves**

The LGS assessment (Page 15) explains that:

“The land proposed to be designated lies wholly within 200-400m walking distance from existing populations. It serves hundreds of homes in The Elms alongside residents using routes from Wraxall to the east and Nailsea to the west via direct Public Rights of Way.”

Reference to distances depend on the point at which the distance is measured and from the southern extent of the LGS this would encapsulate significantly higher number of homes within the The Elms, than if this was measured from central point of the site. Notwithstanding this, it is acknowledged that the existing LGS at Vowles Close is located at the settlement edge of Nailsea and The Elms residential area. The wider LGS area, as now proposed is more remote and a greater distance from the Elms residential area.

Reference to the site and its Public Rights of Way serving residents further afield should be considered carefully and there is particular concern that the use of the Public Rights of Way is being referenced to elevate the importance of this land in LGS terms. The Public Rights of Way exist irrespective of LGS designations and do not confer any wider rights of access beyond these designated routes on to private land.

**b). demonstrably special to a local community**

The Local Green Space Assessment was not published in support of the Regulation 14 consultation which ran from the 5<sup>th</sup> December 2022 until the 1<sup>st</sup> February 2023, despite being referenced within the Reg 14 consultation document at paragraph 1.5.

This was recognised by North Somerset District Council within their report

to the September 2023 Executive Committee, where it states:  
*“Although the Regulation 14 consultation version Neighbourhood Plan contained a number of Local Green Space designations there was no accompanying evidence report which explained the basis on which each of the designations was being proposed. This omission was commented on by North Somerset Council and also another respondent. The final submitted Consultation Statement explains that no report was published at the time because responses to the Regulation 14 consultation version of the Plan were intended to be used to inform the Local Green Space evidence report. The Consultation Statement and Local Green Space Assessment paper do reference that discussions have taken place with the relevant landowners in accordance with government advice, however the omission is regrettable. Should Executive be minded to accept the recommendations of this report then the regulation require that a period of consultation must be undertaken by North Somerset Council prior to the Plan being submitted for examination. This will provide an opportunity for interested parties to respond to the additional evidence as necessary.”<sup>3</sup>  
(Our emphasis).*

In terms of ‘discussions’ with relevant landowners referenced above, it is noted that within the Consultation Statement (see paragraph 2.15) it states that registered landowners of all the relevant land were consulted by email or letter in December 2022. This is not correct in respect of the landowners whom WSHV have entered into a promotional agreement with. It was only with the publication of the Reg 14 consultation which, as noted above, was not supported by the main evidence base (the Local Green Space Assessment), that the landowners became aware of the intent to designate this land as LGS.

The omission of the Local Green Space Assessment as part of the Regulation 14 consultation was more than just regrettable. This omission denied the opportunity to scrutinise the justification for LGS designations at the early stage, limiting the opportunities of WSHV and landowners to comment on the evidence base until this current Reg 16 consultation stage.

The following section of our comments deal specifically with the justification of the Elms Open Space LGS as set out in the Local Green Space Assessment (Site Ref: WF0001), with specific regard to paragraph 102, part b, of the NPPF.  
(3 Source: Paragraph 3.10 of 6th September 2020 North Somerset Council Report to Executive.)

The site description does not identify from the outset that land which adjoins the settlement of edge of Nailsea forms part of an existing LGS designation, ‘Land north of Vowles Close’, as designated through the North Somerset Sites and Policies Plan. This is however acknowledged within the WFNP at paragraph 2.57. The failure to clearly identify the existing LGS within the LGS Assessment results in an analysis that is artificially skewed and in doing so, fails to differentiate key features which distinguish land which forms the existing LGS and the additional land to the north which the WFNP now seeks to designate as part of an expanded LGS.

The extent of the existing LGS is shown below. It should be noted that this LGS area is owned and managed by North Somerset District Council and it is wholly open to the public – access is not restricted to specific routes or paths. This is in stark contrast to the wider area to the north, controlled by WHSV, which is privately owned and access limited to designated Public Rights of Way (see attachment for map).

In order to determine whether part b of paragraph 102 has been satisfied it is important to consider the LGS Assessment (May 2023) and the basis upon which it demonstrates that this land is demonstrably special to the local community and holds a particular local significance.

We reiterate the fact that land immediately north of Vowles Close is already designated as LGS and therefore what is being proposed through the WFNP is an extension to an existing LGS. This should be the basis upon which the LGS Assessment is framed, however this is not the case and, in our view, this approach and the associated analysis misrepresents and fails to recognise the distinction between land which is currently an LGS area and land which would form an extension to it.

The LGS Assessment recognises that land immediately north of Vowles Close (the existing LGS) is reasonably formal in nature, comprising a Play Area (The Elms Playground). It then goes on to note that as users travel north *the area becomes more rural and less formal, although footpaths remain clearly defined and frequently travelled*. Beyond the River Land Yeo and outside of the proposed LGS area, the LGS Assessment concludes that *the land becomes further from the local communities which it serves and more akin to the wider countryside, becoming arguably less demonstrably special to the local community and seen as part of the wider countryside*.

The LGS Assessment concludes this analysis by recognising that “*a judgement is required to be made as to where this differentiation is to be drawn*”. The LGS Assessment seeks to differentiate land (and therefore its value/importance to the local community) in terms of land north of the River Land Yeo and land between Nailsea and the River Land Yeo.

It is our position that the clear line of differentiation is between land which is currently designated as a LGS and land to the north, controlled by WHSV. A key distinguishing feature is that the existing LGS area, directly north of Vowles Close, is publicly owned and is fully open to the public, where access is not restricted to specific routes or path and this includes The Elms Playground. Land to the north is privately owned and access is limited to designated Public Rights of Way.

There is no wider recreational value to this land beyond access to existing Public Rights of Way and this represents a clear distinction between the two land areas and should be the basis upon which the LGS assessment differentiates its assessment.

Within the LGS Assessment it explains that 65% of residents identified The Elms Playground as important or very important. The Elms Playground is located within the existing LGS designated area, which is publicly owned and wholly open to the public, where access is not restricted. It is a misrepresentation to suggest that The Elms Playground is a feature which

is of direct relevance to the wider proposed LGS area. Moreover, the extent to which an existing play provision and the importance attached to it in survey responses, is of direct relevance to proposals for LGS designation is not explained within the LGS Assessment.

The LGS Assessment then states that around 45% of feedback forms *supported the protection and enhancement of this area during the summer 2022 consultation activities*". It is our position that 'around 45%' fails to satisfy the requirements of paragraph 102 of the NPPF (part b) in terms of a green space being demonstrably special and having a particular local significance.

Notwithstanding this, the LGS Assessment goes on to explain that "*Those in support generally grouped together The Elms Playground, Pastures Pond and Land between Nailsea and Wraxall (south of Bristol Road) as being special to them, suggesting that these areas are used in combination for recreational activities.*"

Once again, the LGS Assessment is basing its judgement for the whole extent of the LGS on specific features within it, namely The Elms Playground and Pastures Pond. The former already being within an LGS and the latter being located some distance to the main LGS extended area.

The LGS Assessment draws conclusions in terms of these areas being used in combination for recreational purposes, without any specific evidence to demonstrate that this is the case. This does not recognise, or seeks to ignore, that public access and recreational opportunities vary significantly between the existing LGS which is under public ownership with unfettered public access, with land to the north which is privately owned and where access restricted to Public Rights of Way.

The LGS Assessments extrapolates assumptions based on specific matters which are not relevant to this wider LGS area, such as the Elms Playground and Green Pastures Pond and seeks to conclude on that basis that the requirements for LGS are satisfied. It is a self-serving case to extrapolate such matters to the wider LGS area and in doing so it misrepresents the clearly distinguishable features associated with the existing LGS and the wider LGS area.

The LGS Assessment then goes to state that "*97% consider the rural character of the Parish to be important or very important*", as a basis upon which this area is special to the local community. The rural character of the Parish, and the importance attached to it, is not specific to the land which is proposed to be designated as LGS. This represents a Parish-wide matter of importance which reflects the recognition within the WFNP that it is the *distinctly green and rural nature of the Parish which makes Wraxall and Failand an attractive area to live, work and visit..*" (see paragraph 2.56 of the WFNP). *The LGS Assessment fails to identify specific features related to the 'rural character' of the area proposed to be designated as an LGS, rather it relies upon value / importance attached to the rural character of the Parish as a whole.*

*The LGS Assessment refers to the 'land's special characteristics' as being underpinned by its importance within an area of high landscape sensitivity. Which, alongside the role of Green Belt "make it demonstrably special to*

*the local community which use it". The 'role' of the land within the Green Belt has no bearing whatsoever in terms of the importance of land and its suitability for LGS designation, the location of land within the Green Belt does not support the decision to designate land as LGS. Rather, being within the Green Belt requires neighbourhood plans to consider whether an LGS is necessary, given the level of protection already provided by the Green Belt designation.*

*In terms of landscape sensitivity, the LGS Assessment seeks to present a case that its landscape context is somehow unique and therefore an important factor that makes this land particularly special. The 2018 Landscape Sensitive Assessment classifies the majority of land surrounding the built edge of Nailsea as high landscape sensitivity, including land which is allocated for development. Landscape sensitivity is an important consideration in assessing the suitability of development and the capacity to accommodate development appropriately within its landscape context. It is not a blanket restriction on development. The LGS Assessment does not provide any specific details as to the uniqueness of this green space in landscape terms, that would distinguish it from other areas of high landscape sensitivity in the immediate locality and wider area.*

*Based on our comments set out above, it is our conclusion that the LGS assessment does not provide a coherent or justifiable basis to conclude that the LGS, insofar as it relates to the wider LGS area and land which forms part of WHSV land control, is either demonstrably special to the local community or holds any particular significance. The LGS assessment extrapolates assumptions based on specific matters which are not relevant to this LGS area, such as the Elms Playground and Green Pastures Pond, and fails to accurately identify the clear distinction in terms of access and recreational value between the existing LGS and the proposed wider LGS area.*

*The LGS assessment does not provide details which are specific to the precise proposals of the LGS; consultation feedback referenced in the LGS assessment does not support the conclusions drawn. As such, part b of NPPF para 102 is not satisfied. In circumstances where one part of para 102 of the NPPF is not satisfied, this means that the basis for the proposed LGS cannot stand.*

**c). local in character and is not an extensive tract of land.**

It is acknowledged that there is no specific definition as to what constitutes an 'extensive tract of land', but in the context the proposed LGS designation at The Elms Open Space, there is concern that the proposed scale of this designation does amount to an extensive tract of land.

The LGS area amounts to 16ha and the LGS assessment (page 15) justifies this principally on the basis of the population it serves. Such an approach lacks any appropriate justification and if this was a driver for determining the extent of the LGS, then we must refer back to the physical extent of the Vowles LGS, which serves the same community but is vastly different in scale and form.

The LGS assessment (page 15) goes on to state:

"It is considered therefore that its size at 16ha is suitably justified in terms of providing a suitable level of both formal and informal local green space for such populations and the area should not be regarded as an extensive tract of land on this basis".

There is significant concern with this approach. It refers to the LGS as a whole, including the existing LGS and land controlled by Wain Homes as suitable for providing green space for the population it serves, without any recognition that the open space/recreation features vary significantly between the existing LGS, which is publicly owned and accessible, with private land beyond to the north where access is restricted only to Public Rights of Way.

The accessibility and recreation function of these distinct areas should be clearly defined and in doing so, it will demonstrate that land beyond the existing LGS does not provide for the public access and unfettered access for recreation which is a feature of the land currently designated. As such, this raises significant concern that the extent of the LGS, as proposed in the WFNP, does in fact amount to an extensive tract of land.

#### Rights of Access

As set out in the PPG4, a LGS designation does not confer any rights of public access over what exists at present and this should be an important consideration as the WFNP progresses. The legal rights of landowners and anyone authorised by them to use the land must be respected, and any decision to designate land for LGS should not be based on any assumption of improved access, where there is no agreement with the landowner.

There is significant concern with the analysis set out in the LGS Assessment where it concludes that The Elms Playground, Green Pastures Pond and the land between Nailsea and Wraxall are used in combination for recreational activities. It goes on to state that inclusion of The Elms Open Space “would protect land that includes a diversity of formal and informal green spaces and is readily accessible to wider residential populations reflective of its existing and recognised and important role and function as a green “lung” to the Elms and this part of Nailsea which makes this area demonstrably special to the community.”

This fundamentally misrepresents the limited access and recreational value of land controlled by WHSV and fails to distinguish this land from the publicly accessible recreational area which forms the existing LGS designation. Land controlled by WHSV is privately owned and public access is restricted to existing Public Rights of Way.

The analysis set out in the LGS Assessment is flawed as it fails to correctly distinguish ownership, access and recreational value of the proposed LGS Area. It is within the gift of the landowner to take measures to ensure that land controlled by WHSV remains private and that access is restricted to the existing Public Rights of Way.

In response to the LGS proposals set out in the WFNP, the landowner and their tenant farmer are concerned that local people will not necessarily understand that a “Local Green Space” does not confer any additional rights of access, and that effectively extending the existing North Somerset LGS (that is fully publicly accessible) to include this land (where public access is only permitted on the Public Rights of Way), could mislead local people to believe that the enlarged LGS is also fully publicly accessible – for a member of the public, it would be reasonable to assume that levels of access changes as part of the change in designation, otherwise why



change the designation if nothing else actually changes.

The landowner and their tenant farm are therefore considering the most appropriate ways to manage public access over the land, to ensure that private land is secured to prevent unauthorised access beyond existing Public Rights of Way, to enable the tenant farmer to carry out their activities without any risk to livestock or to the public incorrectly believing they have access over the wider land away from the Public Rights of Way. This is likely to result in the erection of fencing to restrict public access to the existing Public Rights of Way only across the land proposed in the WFNP as LGS.

(4 Planning Practice Guidance – Paragraph: 017 Reference ID: 37-017-20140306 06.03.2014)

The ability of the landowner and their tenant farmer to take reasonable and responsible steps to fence the land in this part of the proposed LGS demonstrates further the restrictions on public access and the limited recreational value this land has, and in doing so, reinforces our position that the LGS

Assessment misrepresents the recreational value of this land. It clearly demonstrates the distinction between the existing LGS area and land to the north with the WFNP seeks to designate as LGS.

The LGS does not introduce any additional layers of protection or enhancement, which are not already in place in terms of access to Public Rights of Way. Given that this land is already designated as Green Belt, we refer back to the Planning Practice Guidance<sup>5</sup> (PPG) requires that if land is already protected by Green Belt policy, then consideration should be given to whether any additional local benefit would be gained by designation as LGS. The answer in this case has to be that no additional local benefits would be gained by designation as LGS.

(5 Planning Practice Guidance – Paragraph: 010 Reference ID: 37-010-20140306 Rev Date 06.03.2014)

#### Conclusions

Our representations to this Regulation 16 consultation on the Wraxall and Failand Neighbourhood plan considers that the proposals to designate land at The Elms Open Space as a Local Green Space (Policy WF1) fails to satisfy the requirements of paragraph 102, specifically part b) of the National Planning Policy Framework.

In circumstances where one part of para 102 of the NPPF is not satisfied, this means that the basis for the proposed LGS cannot stand. In turn, the Basic Condition which requires a Neighbourhood Plan to have appropriate regard to national policy and advice has also not been satisfied.

Our comments relate specifically to land which is controlled by WHSV. Our representations do not seek to comment upon the merits or justification of the existing LGS, but are focused on additional land which is proposed through the WFNP as LGS.

The reasons for our position are summarised as follows:

	<ul style="list-style-type: none"> <li>• The WFNP has failed to demonstrate that The Elms Green Space (excluding the existing LGS designation) is <u>demonstrably special</u> and <u>holds a particular local significance</u>.</li> <li>• The LGS Assessment is flawed as it fails to distinguish correctly between land currently designated as a LGS and the wider proposed area, including land controlled by WHSV, in terms of recreational value.</li> <li>• The LGS Assessment extrapolates features such as The Elms Playground and Pastures Ponds as matters that apply to the entirety of the proposed LGS area and in doing so misrepresents the contributions and recreational of value of the wider proposed LGS In turn this raises significant concern that the extent of the LGS does amount to an extensive tract of land.</li> <li>• Evidence to support the LGS proposals lacks specific and detailed analysis of the land which is identified, and fails to demonstrate any additional public benefit above that already provided as a result of the Green Belt designation.</li> <li>• Measures undertaken by the landowner to protect this private land from unauthorised access, demonstrate the limited recreational value of this land, limited to Public Rights of Way.</li> </ul> <p>As per the provisions set out in the national Planning Practice Guidance we consider that it is necessary and fair for our case to be held via a hearing in order to present our case, particularly in light of the concerns expressed as to the approach of the WFNP and its failure to satisfy the requirements of national policy.</p> <p>On behalf of WHSV, I trust that all is in order with our representations and we look forward to the opportunity to debate the matters raised at an Examination Hearing. For map of Wain Homes landholdings see attachment.</p>
Harrow Estates	<p>Harrow supports the principle of proposed Policy WF2, which identified five sites to be designated as Local Green Space. These sites appear important to the community and are actively used by residents. This is based on the evidence provided in the Wraxhall and Failand Local Green Space Assessment. As such, this policy appears to be consistent with NPPF paragraph 101.</p> <p>The nearest Local Green Space to Harrow's land interests (as proposed to be designated) is Wraxall Piece, which lies northeast of Failand Triangle. Whilst this green space appears to be well-used, it lies north of Clevedon Road, which represents an arterial route with traffic often travelling at speed. This creates a potential conflict with pedestrians, as there are no dedicated crossings over Clevedon Road in this location.</p> <p>Harrow's proposals will include enhancements to pedestrian connectivity, including facilitating movement from the existing Failand Triangle to the northern side of Clevedon Road. Noting the proposal to designate Wraxall Piece as a Local Green Space, there is a clear opportunity to secure improved infrastructure consistent with existing 'desire lines' and walking routes. This will help to integrate Wraxall Piece into the village.</p>

**Plan section: Policy WF3: Community Cohesion**

<b>Respondent</b>	<b>Comment</b>
Harrow Estates	<p>Harrow supports the principle of draft Policy WF3 and agrees that integrating new neighbourhoods with existing communities is an essential aspect of place-making. Indeed, identifying clear matters to address (in the way proposed in this draft policy) promotes their consideration early in the design process, which will prove helpful to developers.</p> <p>Harrow, through its promotion of strategic growth at Failand Triangle, has undertaken a thorough 'baseline review' to understand the physical infrastructure in and around the settlement. This has included a review of walking and cycling routes, bus services and highway infrastructure. On this basis, Harrow has identified a range of improvements to the Public Rights of Way and the National Cycle Network and the provision of new routes, alongside enhancements to the highway network and public transport infrastructure.</p> <p>Harrow's emerging proposals at Failand Triangle also include new community parks and facilities that will be strategically located to ensure that the development can be integrated into the settlement for both the new and existing communities to enjoy. A new primary school will also be brought forward as part of Harrow's strategic development. This will be located to maximise accessibility and ensure pupils can walk to school<sup>1</sup>.</p> <p>This approach, which is consistent with Active Travel England's guidance, will ensure that the school acts as a focus for local interactions. This is consistent with NPPF paragraph 92, which indicates that planning policies and decisions should "...promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other."</p>

**Plan section: Policy WF3: Community Cohesion**

<b>Respondent</b>	<b>Comment</b>
Harrow Estates	<p>Harrow supports the principle of draft Policy WF3 and agrees that integrating new neighbourhoods with existing communities is an essential aspect of place-making. Indeed, identifying clear matters to address (in the way proposed in this draft policy) promotes their consideration early in the design process, which will prove helpful to developers.</p> <p>Harrow, through its promotion of strategic growth at Failand Triangle, has undertaken a thorough 'baseline review' to understand the physical infrastructure in and around the settlement. This has included a review of walking and cycling routes, bus services and highway infrastructure. On this basis, Harrow has identified a range of improvements to the Public Rights of Way and the National Cycle Network and the provision of new routes, alongside enhancements to the highway network and public transport infrastructure.</p> <p>Harrow's emerging proposals at Failand Triangle also include new community parks and facilities that will be strategically</p>

	<p>located to ensure that the development can be integrated into the settlement for both the new and existing communities to enjoy. A new primary school will also be brought forward as part of Harrow's strategic development. This will be located to maximise accessibility and ensure pupils can walk to school1.</p> <p>This approach, which is consistent with Active Travel England's guidance, will ensure that the school acts as a focus for local interactions. This is consistent with NPPF paragraph 92, which indicates that planning policies and decisions should "...<i>promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other.</i>"</p>
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**Plan section: WF4 Walking Cycling and Wheeling Networks**

<b>Respondent</b>	<b>Comment</b>
Harrow Estates	<p>Harrow agrees with the principle of this proposed policy, as it seeks to promote accessibility, mobility and travel planning, all of which contribute towards sustainable development and the promotion of active forms of travel.</p> <p>Failand is an area where the use of private vehicles currently predominates in travel habits. To assist in changing this pattern of behaviour, the proposed policy identifies the need to enhance the sustainable travel network in the local area; <i>"Development proposals must demonstrate through proportionate transport assessment how the safety, legibility and capacity of the existing walking, cycling and wheeling network will be impacted, and where appropriate be protected and/ or mitigated to ensure that routes are not reduced in value in terms of these aspects. Development proposals will be supported where new or enhanced walking, cycling and wheeling connections will be delivered."</i></p> <p>Harrow has identified a lack of dedicated cycle infrastructure in and around Failand Triangle through its baseline review. Despite this, there are a significant number of well-used informal cycle routes.</p> <p>This mismatch in infrastructure provision versus behaviour suggests that a proportion of the local population are 'latent cyclists'. These are people who would be willing to make more of their journeys by bicycle if better infrastructure were available. This is consistent with the analysis presented in paragraph 5.22 of the Draft Neighbourhood Plan.</p> <p>Harrow has been in discussions with cycling charity Sustrans and, through this engagement, has identified the potential to deliver new and upgraded routes through its proposed development. This will focus on linking cycle routes around Failand Triangle to Route 33 (Festival Way), which forms part of the National Cycle Network. This largely traffic-free route terminates in Bristol City Centre, providing direct, safe and</p>

	<p>convenient access to the heart of the largest workplace zone in the region. Indeed, this is consistent with the opportunity identified in paragraph 5.24 of the Draft Neighbourhood Plan. In addition to the strategic improvements described above, Harrow's envisaged development at Failand Triangle will include new on-site pedestrian and cycle routes, which will connect appropriately to the surrounding network. Likewise, should growth come forward, Harrow anticipates that other upgrades will be made to the local highway network to promote safe usage by pedestrians and cyclists. This is expected to include improvements to the B3128, B3129 and Flax Bourton Road.</p>
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**Plan section: WF5:Traffic and Transport**

<b>Respondent</b>	<b>Comment</b>
<p>Harrow Estates</p>	<p>Harrow agrees with the principle of draft Policy WF5, which is to provide a more proactive approach to dealing with the impacts of highway safety and traffic increases resulting from new development. Regardless of whether Local Plan Policy DM24 is treated as a 'strategic' or 'non-strategic' policy (for the purposes of the Basic Conditions), draft Policy WF5 is consistent with the NPPF2 (As a matter of procedure, the reference to NPPF 2021 should be updated to reflect the latest issue of the NPPF, September 2023), particularly paragraphs 110 and 111.</p> <p>Harrow proposes new improvements to the Weston Road / Flax Bourton Road junction (as part of its envisaged development). This will create a safer intersection and enhance this area's perception as a gateway into Failand Triangle. Harrow is also in dialogue with Forestry England and has agreed to provide (within Harrow's land) a new vehicular access into the Ashton Hill Plantation, alongside a new car park and visitor/information centre. This new provision will allow Forestry England to close their current substandard arrangement, located off the B3129 / Flax Bourton Road junction, reducing the tendency for on-street parking in this area, thereby helping to address traffic and highway safety issues. A range of other measures will promote integration with the established community. These will include traffic calming measures, pedestrian crossing, and improved pedestrian and cycle networks (as detailed in our comments on Policy WF4).</p> <p>Furthermore, Harrow recognises the importance of reducing the number of trips generated by travel to and from key services. One of the main benefits of strategic growth (as Harrow envisages at Failand Triangle) is the opportunity to introduce new facilities and to sustain these with a greater critical mass of population. Significantly, this will include a new primary school, reducing the necessity for travel (by private vehicle) outside the village.</p> <p>In addition to promoting 'trip internalisation', Harrow recognises the important role buses play in the sustainable movement of people from the village to Bristol. The X6 route provides</p>

	<p>(essentially) hourly services to and from Bristol and allows for commuting. This represents a good level of service, but which could be improved. Harrow has been in dialogue with local bus operators to discuss whether the frequency or speed of services could be further enhanced, for example, by introducing express services at key points during the day. Greater patronage will also be promoted through an increase in the settlement's population, which will assist in supporting the viability of bus services. More generally, the individual or cumulative impacts on the highway network (arising from Harrow's proposals), alongside any mitigation required, will be fully considered as part of a formal planning application (should strategic growth be progressed at Failand Triangle).</p>
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**Plan section: WF7: Planning for Green Infrastructure, Biodiversity and Food Production**

<b>Respondent</b>	<b>Comment</b>
Harrow Estates	<p>Harrow supports the proposed Policy WF7, which is consistent with national planning policy as expressed in Section 15 of the NPPF ('Conserving and Enhancing the Natural Environment') and the requirements of the Environment Act (2022).</p> <p>Through its proposals at Failand Triangle, Harrow will introduce new open and green spaces for community use, such as public gardens, community parks, woodlands, conservation sites, and green corridors. The provision of open spaces will form part of a holistic Green and Blue Infrastructure strategy, which will integrate (for example) new Sustainable Urban Drainage Systems (SuDS) with areas for biodiversity enhancement.</p> <p>Harrow's emergent design work is based on detailed surveys of the habitats and landscape features within its land interests (which sometimes connect to wider ecological networks). As a result, its proposals will retain existing hedges and trees and provide appropriate green buffers towards sensitive receptors. Regarding food production, there are opportunities to provide new allotments (the details of which Harrow is happy to discuss with the Parish Council). Likewise, the landscape planting for the site can include fruit trees and community orchards, which produce food for consumption but also provide significant biodiversity enhancements compared to intensive arable farming.</p>

**Plan section: WF8: Phasing of Infrastructure within Development**

<b>Respondent</b>	<b>Comment</b>
Harrow Estates	<p>Harrow supports the phasing of infrastructure delivery, particularly where this is linked to the provision of new development (including new homes). Indeed, appropriate phasing and the use of 'triggers' (within Section 106 Agreements) to bring forward required infrastructure at specific junctures is an established planning principle.</p>

	<p>In this context, Harrow regards draft Policy WF8 as an appropriate policy in principle. Harrow is also committed to working with NSC and the Parish Council to agree on the infrastructure required (and its phasing) to deliver growth at Failand Triangle and satisfy this proposed Neighbourhood Plan policy.</p> <p>However, noting that the policy appears to rely on the future preparation of a Local Infrastructure List to be effective (as detailed in paragraph 5.39 of the draft Neighbourhood Plan), Harrow considers that there should be a clear process for producing that list, and in specified timescales. Harrow (as the primary developer promoting strategic growth at Failand Triangle) is happy to support the Parish Council with this work and is willing to share its own baseline review / technical evidence to help identify gaps in provision and scope for improvements.</p> <p>We trust that these comments are of assistance to NSC and Wraxall &amp; Failand Parish Council. Overall, Harrow Estates considers the Draft Neighbourhood Plan to be well-conceived. It represents a pragmatic and sensible response to the issues identified, not least the potential for future strategic growth within the Neighbourhood Plan Area. It is consistent with national planning policies and addresses the 'basic conditions'.</p> <p>As indicated, Harrow remains committed to continued dialogue with the Parish Council and NSC and is happy to discuss the community's infrastructure requirements and the phasing of development. If strategic growth is to take place at Failand Triangle, then Harrow will embark on a full programme of stakeholder and community engagement to ensure that development addresses the needs of existing and future residents.</p> <p>See attached file for images and appendices</p>
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<b>General comments from statutory consultees:</b>
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<b>Respondent</b>	<b>Comment</b>
Historic England	<p>Thank you for your Additional Regulation 16 consultation on the submitted version of the Wraxall and Failand Neighbourhood Plan.</p> <p>This email is to confirm its receipt and that we have no additional comments to those made in our original Regulation 16 consultation response.</p>
Environment Agency	<p>Thank you for consulting the Environment Agency regarding the above Wraxell and Failand Neighbourhood Plan</p> <p>The Environment Agency's comments remain as set out in previous correspondence dated 11 October 2023 and 30</p>

	<p>January 2023. However, we wish to add the following comments.</p> <p>We are supportive of the protection of biodiversity and green infrastructure within the Neighbourhood Plan area through policy WF7.</p> <p>In addition to the flood risk mitigation and maximising sustainability in policy WF9, we are supportive of the policy promoting the enhancement of biodiversity for any new development.</p>
<p>National Gas (Avison Young)</p>	<p>National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p>About National Gas Transmission National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>Proposed sites crossed or in close proximity to National Gas Transmission assets: An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.</p> <p>National Gas Transmission provides information in relation to its assets at the website below.</p> <p><a href="https://www.nationalgas.com/land-and-assets/network-route-maps">https://www.nationalgas.com/land-and-assets/network-route-maps</a></p> <p>lease also see attached information outlining guidance on development close to National Gas Transmission infrastructure.</p> <p>Distribution Networks Information regarding the gas distribution network is available by contacting: <a href="mailto:plantprotection@cadentgas.com">plantprotection@cadentgas.com</a></p> <p>Further Advice Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included</p>
<p>National Grid (Avison Young)</p>	<p>National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following</p>



representation with regard to the current consultation on the above document.

#### About National Grid Electricity Transmission

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets:

An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area. NGET provides information in relation to its assets at the website below.

[www2.nationalgrid.com/uk/servicees/land-and-development/planning-authority/shape-files/](http://www2.nationalgrid.com/uk/servicees/land-and-development/planning-authority/shape-files/)

Please also see attached information outlining guidance on development close to NGET infrastructure.

#### Distribution Networks

Information regarding the electricity distribution network is available at the website below: [www.energynetworks.org.uk](http://www.energynetworks.org.uk)

#### Further Advice

Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included