

Site Allocations Plan - further site assessments August 2017

Document Section/Site		Land at Wilson Gardens/Scot Elm Drive, Weston-super-Mare	
Comment ID	Organisation	Comment	Attached documents
5950689//7	Environment Agency	Land at Wilson Gardens/Scot Elm Drive, WsM - This site is located within Flood Zone 3*. The Agency would advise that fluvial floodplain compensation would be required at this site. For information, the Agency has previously objected to a proposed development at this site, due to the omission of flood compensation works.	
14590529//3	Persimmon Homes Severn Valley	Land at Wilson Gardens/Scot Elm Drive, W-S-M – the development industry consortium agree that this site is likely to deliver in 5 years (although we note that there should be an adjustment of -1 unit to reflect the planning application).	

Document Section/Site		Dauncey's Hotel, Claremont Crescent, Weston-super-Mare	
Comment ID	Organisation	Comment	Attached documents
14590529//6	Persimmon Homes Severn Valley	Dauncey's Hotel, W-S-M – We note that the Council has not received a response from the agent or developer for this site. As such, there is uncertainty as to whether this site is currently available or deliverable. At this stage, we suggest that it could be included in the plan period but should not count towards 5 year supply.	

Document Section/Site		Queensway/Midhaven Rise, Weston	
-----------------------	--	---------------------------------	--

Comment ID	Organisation	Comment	Attached documents
14590529//10	Persimmon Homes Severn Valley	Queensway/Midhaven Rise, W-S-M – the development industry consortium notes that this site will require the relocation of the playing pitch and identifies that it will not deliver in the five year period. At this stage, we suggest that it could be included in the plan for residential development subject to a replacement pitch being provided but this site should not count towards 5 year supply	

Document Section/Site	26 Bristol Road Lower, Weston-super-Mare
------------------------------	--

Comment ID	Organisation	Comment	Attached documents
14590529//12	Persimmon Homes Severn Valley	26 Lower Bristol Road, W-S-M – Pre-application requested in June 2017. There is currently a vacant care home on site. The site is within the Boulevard/ Montpelier Conservation Area and close to/ potentially overlooking the Bristol Road Baptist Church Listed Building. Both have the potential to constrain development potential. Topography of the site is fairly steep which is likely to reduce the developable area. This site could be identified for development subject to a thorough review of the site constraints and resultant capacity	

Document Section/Site	Land west of the M5, Locking Parklands
------------------------------	--

Comment ID	Organisation	Comment	Attached documents
14590529//13	Persimmon Homes Severn Valley	West of M5 Locking Parklands – This site has major acoustic constraints and the Council actually notes that suitable noise attenuation is unlikely to be feasible in the constraints section. The consented Mead scheme to the north is required to provide a significant noise attenuation bund and fence which reduces the developable area considerably. The site currently has no means of access with no future access provided from the existing developments of Locking Parklands and Locking Grove. Furthermore the proposed Mead development to the north is unlikely to extend to the northern boundary of this site for a significant number of years with no proposed means of access shown in any case. The proposals also conflict with potential	

Comment ID	Organisation	Comment	Attached documents
		J21a strategic work. Significant work will also be required with regards to the strategic flood solution and an ecology and maintenance buffer (min. 10m) will be required alongside the Grumblepill Rhyne further reducing developable area. The site should therefore be discounted at this stage	

Document Section/Site	Land at Station Road, St Georges
------------------------------	----------------------------------

Comment ID	Organisation	Comment	Attached documents
5950689//6	Environment Agency	Land at Station Road, St Georges – This site is located within Flood Zone 3*. The Agency would advise that fluvial floodplain compensation would be required. Any River Banwell bridging works necessary for access/egress purposes, would require the Agency’s prior approval through the Flood Risk Activities Permitting process	
17400321//2	Walsingham Planning	The identification of our client’s land interests at Station Road, St George’s is welcomed through this consultation process. We can confirm that the land remains available and proposals could be progressed quickly in order to contribute to the housing land supply.	
14590529//17	Persimmon Homes Severn Valley	Land at Station Road St Georges – NSC note major constraints (no access as river crossing, acoustic issues and no flood solution) plus archaeology and landscape issues. Also no agent response and not being actively promoted. The development industry consortium questions the deliverability of this site.	

Document Section/Site	2-6 Bay Road, Clevedon
------------------------------	------------------------

Comment ID	Organisation	Comment	Attached documents
14590529//9	Persimmon Homes Severn Valley	2-6 Bay Road, Clevedon – The application is for a change of use from a nursing home (C2) to 19 self-contained flats (C3) and was submitted by Cherry Rose Limited in May 2017. The site is currently operating as Bay View Residential and Nursing Home. At this stage, it is not clear if this site is available now. At this stage, we suggest that it could be included in the plan period but, until availability is confirmed, it should not count towards 5 year supply.	

Document Section/Site	Waverley House, Clevedon
------------------------------	--------------------------

Comment ID	Organisation	Comment	Attached documents
5950689//12	Environment Agency	Waverley House, Clevedon – This site is located within Flood Zone 3*. Additionally, the site is located over the Land Yeo, a Statutory Main River. Accordingly, any works within 8m of the river would require the Agency's prior approval through the Flood Risk Activities Permitting process.	
5950689//19	Environment Agency	Waverley House, Clevedon. The site is located on the Land Yeo watercourse. Accordingly, the Agency must recommend the provision of buffer strips to protect the watercourse, together with agreed habitat improvement measures.	
14590529//11	Persimmon Homes Severn Valley	Waverley House, Clevedon – will deliver in 5 years but note for the record that this scheme as per the other Clevedon proposals is for apartments with no affordable provision	

Document Section/Site	173 Kenn Road, Clevedon
------------------------------	-------------------------

Comment ID	Organisation	Comment	Attached documents
5950689//1	Environment Agency	173 Kenn Road, Clevedon – This site is located within Flood Zone 3*	
14590529//14	Persimmon Homes Severn Valley	173 Kenn Road, Clevedon – The site is being considered for a retirement and extra care scheme so C2 use (possibly with no affordable provision) and therefore should be discounted. . Site also in existing employment use and therefore questionable in terms of deliverability at this stage. Note site capacity in part 2 recorded as 60 rather than 75 as shown in trajectory	

Document Section/Site Court Farm All Saints Lane, Clevedon


Comment ID	Organisation	Comment	Attached documents
14590529//18	Persimmon Homes Severn Valley	Court Farm, Clevedon – Site partly in green belt so should have been discounted and capacity questioned further. Also technically not previously developed land as per NPPF definition regarding agricultural buildings. In addition, there are identified constraints re heritage, bats, access, flood, parking so concerns if deliverable at this stage.	


Document Section/Site Land north of Youngwood Lane, Nailsea

Comment ID	Organisation	Comment	Attached documents
5950689//9	Environment Agency	Land north of Youngwood Lane, Nailsea – Although the site is located within land designated as Flood Zone 1, the low lying nature of the site may result in significant drainage issues, which may increase flows in the Main River. This could potentially necessitate the provision of infrastructure improvements.	

Comment ID	Organisation	Comment	Attached documents
5950689//21	Environment Agency	<p>Land north of Youngwood Lane, Nailsea. The site is in the vicinity of the Youngwood Lane and Nailsea and Tickenham Moors Local Wildlife Sites. Accordingly, any development has the potential to detrimentally impact on these sites.</p>	
14827873//1		<p>This site would not meet the requirements for sustainable development, the existing infrastructure in Nailsea (particularly roads) is not sufficient for a development of this size in this location and the setting of Chelvey, a nearby conservation area would be significantly impacted by the traffic generated. The RAG statuses given in the SAP assessment are not particularly favourable for this site and further examination shows that the rating given are far more generous than is reasonable. The site should therefore not be included in the SAP. I have the following specific comments:</p> <p>Sub objective 1.4 (healthcare): while there are GP surgeries in Nailsea, they are all at least 2km away, so are not easily accessible on foot and would most likely be accessed by car. It should be noted that the nearest hospital (Clevedon) offers a very limited range of services and only during office hours. Notably there is no A&E service. Also, the nearest dentists and pharmacies are located in the town centre, which is over 2km away from the nearest point of the site, and considerably further from the furthest point of the site.</p> <p>Sub objective 2.1 (community facilities): the green rating for this objective does not reflect the true accessibility of community facilities. While the range of community facilities in Nailsea is good, the vast majority (e.g. post office, supermarkets, banks, leisure centre) are in the town centre, which is over 2km away from the nearest point of the site, and considerably further from the furthest point of the site. Facilities within reasonable walking distance of the nearest point of the site, but not the furthest are: a convenience store and a hair dresser. Therefore, the green rating should be Amber at best, but red would meet the criteria far better.</p> <p>Sub objective 2.4 (local work opportunities): the green rating is not at all justified. It is widely accepted that Nailsea is a commuter town, because it does not offer sufficient or suitable employment for its residents. 2011 census data shows that the vast majority of Nailsea residents are employed outside Nailsea (mostly in Bristol or South Gloucestershire). While there are employment opportunities in Nailsea, they are extremely limited. The rating for this objective should be amber at best.</p>	


Comment ID	Organisation	Comment	Attached documents
		<p>Sub objective 2.5 (access to town centre): the site is on the edge of a town, but it is at the furthest possible edge from the town centre, which is over 2km away from the nearest point of the site, and considerably more from the furthest point. The majority of the site is also not within reasonable walking distance from bus stops to the town centre. The town centre is therefore only reasonably accessible by car but given that there are already parking constraints in Nailsea, it is only reasonable to conclude that the town centre will not be easily accessible for residents of the proposed development. This rating should therefore be amber at best.</p> <p>Sub objective 4.1 (heritage assets): the criteria makes reference to listed buildings and conservation areas, but the justification for the green status is that the site is not close to heritage assets. However, it is close to several listed buildings and Chelvey, which is a conservation area. The additional traffic from the site would have a significantly detrimental impact on the character of Chelvey, since the road through Chelvey is a main route to the A370 and the airport. This rating should therefore be red.</p> <p>Sub objective 4.2 (biodiversity): the RAG assessment states that the impact on bats can be mitigated. However, the "Prevention of Lighting Impacts on Bats" document as part of the Mactaggart & Mickel application shows that the houses next to the foraging routes will need low wattage bulbs. There is no mention of how retention of this mitigation feature will be monitored or enforced once the dwellings are in use. Monitoring and enforcing retention of the required lighting will be particularly difficult in the longer term and it is not clear how quickly remedial action could be taken. Also, the vegetation required for mitigation would only be effective once mature and so there would be adverse impact while the vegetation is maturing.</p> <p>Sub objective 4.3 (landscape impact): while the RAG status is consistent with the criteria (the site does not directly affect a designated area), it should be noted that development of the site would result in a significantly adverse impact on a prominent and large area of Nailsea Farmed Coal Measures. The North Somerset Landscape Character Assessment describes this landscape type as "almost unique" within the district. So the landscape impact would be significantly adverse.</p> <p>Sub objective 4.7 (surface water flooding): the green rating is inconsistent with the site suitability comment in the site suitability section that there will be "surface water drainage issues to address".</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Sub-objective 4.8 (traffic): the amber rating requires there to be no existing highway capacity issues. However, the Mactaggart and Mickel application shows that the Backwell traffic lights are already over-capacity and that other junctions will be over capacity by 2021, even without this site being developed. It also shows that the lanes servicing this site (Netherton Wood Lane, Chelvey Road and Brockley Lane) are already close to the capacity for roads with such a significant proportion of single track. Therefore a red rating is the only reasonable rating to give.</p> <p>Sub objective 5.2 (proximity of bus stops): the green rating is based on the closest part of the site being within 400m of a bus stop. However, this stop is significantly further from the majority of the site and only serves certain locations and not the full range of destinations available from Nailsea bus services.</p> <p>Sub objective 5.3 (pedestrian and cycle links): residents would need to cross busy roads (Queens Road and Stock Way) to access most day to day facilities in the town centre. Therefore the amber rating is generous.</p> <p>Sub objective 5.5 (distance from settlement boundary): while part of the site is adjacent to the settlement boundary, the site map clearly shows that the majority is not adjacent to the settlement boundary. The site would not form a natural extension of Nailsea and would be a satellite settlement that would not appear to be integrated with the rest of Nailsea,</p> <p>In summary, the site to the North of Youngwood Lane, Nailsea, should not be included in the SAP, because despite being on the edge of a town, it is not in a suitable location for sustainable development.</p>	
11936993//1	c/o agent Rocke Associates	<p>My clients' site north of Youngwood Lane, Nailsea is needed as part of the additional provisions that the Inspector has held must be made in the SAP to 'meet' the growth requirements during the current Core Strategy period.</p> <p>The site accords with the priority site selection criteria endorsed by the Inspector for allocations to provide for the additional requirement that she has held must be identified in the SAP.? No weight can be given to any future strategic growth aspirations which have yet to be formalised in a draft Plan let alone subject to Examination, and any alternative approach to my clients' site in this respect would be unjustifiable and untenable given its inconsistency with the proposed allocation in the SAP at Engine Lane.</p>	 North Somerset Site Allocations Plan Examination Consultation on Further Residential Site Assessments.msg (354 KB)

Comment ID	Organisation	Comment	Attached documents
		<p>The entirety of my clients site north of Youngwood Lane should be allocated in the SAP now. If considered necessary and justified by the available evidence, suitably worded provisions could be agreed to make adequate and reasonable safeguards to accommodate the possibility of a future metro bus route through the site, subject to that route being confirmed within a prescribed time period.</p> <p>The Council will not need reminding that a failure to respond to the deficiencies of the process identified by the development industry, or to provide robust evidence and justification why the additional housing requirement identified by the Inspector cannot be accommodated, could, at best, further delay the Examination process, and at worst, result in a finding that the SAP is unsound</p>	
14647553//2	Nailsea Action Group	Second attempt to send a file representing the Nailsea Action Group's response to the proposed addition of the land to the north of Youngwood Lane to the Sites Allocation Plan. Nailsea Action Group does not support this addition. All contact details are on the attached file	 Addn SAP objections.doc (40 KB)
1018753//1	Natural England	We have concerns about the development of Land at Youngwood Lane in Nailsea, which is a relatively large site in an area that is highly constrained in terms of statutory designated sites. As such, we agree with the Council's assessment that this site should form part of plan-led allocation and that its integration with wider development will be a matter to address in a coordinated way. Such an approach would need to be based on a sound understanding of the wider development area, including evidence of how the landscape is used by horseshoe bats, to inform the master-planning and give sufficient confidence that the any proposed avoidance, mitigation and enhancement measures would protect the interests of the Bats SAC and Tickenham, Nailsea and Kenn Moors SSSI i.e. they would be effective and deliverable.	

Comment ID	Organisation	Comment	Attached documents
14590529//8	Persimmon Homes Severn Valley	North of Youngwood Lane – An application for outline planning permission was registered in July 2016 and is awaiting determination. In the light of this the development industry consortium agree that, if this site were identified in the SAP, it has the potential to make a significant contribution in the 5 year period and to deliver during the plan period.	

Document Section/Site	Weston College , Somerset Square, Nailsea
------------------------------	---


Comment ID	Organisation	Comment	Attached documents
14827873//2		This site is brownfield and in close proximity to the main facilities in Nailsea (the town centre), as well as being close to the major roads in Nailsea. I am therefore in favour of development on this site as it would represent sustainable development and maximising use of existing land.	
14647553//1	Nailsea Action Group	The attached file consists of the Nailsea Action Group's supportive comment on the addition of Weston College, Nailsea, to the Sites Allocation Plan. All contacts are given in the file.	 Weston College.doc (25 KB)
14590529//19	Persimmon Homes Severn Valley	Weston College, Nailsea - the development industry consortium notes that there has been no agent response. The Council assessment notes ownership dispute will not be resolved in the short term and therefore cannot be considered deliverable at this stage.	

Document Section/Site	Harbour Road Gordano Gate employment allocation, Portishead
------------------------------	---

Comment ID	Organisation	Comment	Attached documents
14590529//4	Persimmon Homes Severn Valley	Harbour Road/Gordano Gate, Portishead – the development industry consortium agree that this site has the potential to deliver in 5 years.	
4193569//1	Portishead Town Council	<p>Portishead Town Council has carefully considered the Further Sites Assessments of the Sites Allocations Plan and wishes to make the following comments:</p> <p>We do not consider that there has been strategic planning in relation to the Further Sites Assessments: it is our opinion that sites delivering less than 1000 dwellings cannot be described as strategic.</p> <p>We object in the strongest possible terms to the description “Part 2 sites broadly in conformity with the Core Strategy framework which will be assessed”. The proposed Portishead sites are certainly not in conformity with the Core Strategy. They are designated for the provision of employment as stated in the Local Development Plan and the Core Strategy that aims to ensure that towns such as Portishead develop sources of employment for local residents.</p> <p>In all the site assessments related to Portishead it is stated that “Sub-objective 5.4 Achieve reasonable access to sustainable transportation proximity of site to railway station Amber Nearest rail station is between 2 and 5 km”. This is patently untrue as there is yet to be a railway station in Portishead and it is currently more that 10kms to nearest existing station at Nailsea & Backwell.</p> <p>Again in all the site assessments related to Portishead it is stated that “Sub-objective 2.2 Achieve reasonable access to a full range of educational facilities – primary education Assessment Using information from ‘Pupil Projections from North Somerset Schools 2015-2019’ Amber Primary school within settlement with limited capacity”. This is also untrue as demonstrated by the fact that 8 reception age children will begin their life at primary school in Portbury because there is no capacity for them in Portishead. This will be exacerbated by the now approved building of 94 flats at Serbert Way with a projection of an additional 21 primary places required. In effect this is one new primary school class.</p> <p>Again “Sub-objective 2.3 Achieve reasonable access to a full range of educational facilities – secondary education Assessment Using information from ‘Pupil Projections from North Somerset Schools 2015 -2019’ Green Secondary school within</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>settlement”. There is a secondary school but the criteria fail to recognise that this school is bursting at the seams, yet again exceeding its PAL for entry in September 2017 and expecting to have a total of 2,200 students in 2018.</p> <p>With specific regard to Old Mill Road, this is an existing area of significant and thriving employment for Portishead: it provides a breadth and depth of jobs at all levels for local residents irrespective of any arbitrary planning use classes. Portishead has very little other land available for such a range of employment opportunities so it is crucial for its future sustainability that Old Mill Road continues to support all the businesses currently there.</p> <p>Other suggested sites are designated for employment but are not currently in use as such. Of those listed only one matches with its planning application number ie 17/P/1229/F; those identified as Harbour Road Gordano Gate Employment allocation, Harbour Road Serbert Way and Site V2 Harbour Road either do not have the correct planning application number or it does not exist on the web site so we are unable to view the planning content of these. Excluding Old Mill Road these sites plan a total of 231 dwellings again with significant impact on the infrastructure of Portishead.</p> <p>Old Mill Road has considerable value to the town in terms of its economy and ongoing vibrancy which we cannot afford to lose.</p> <p>It is our view that any change to the employment character of Old Mill Road would have a detrimental effect on the town: the proposal of 350 dwellings as part of a mixed use scheme would significantly impact on traffic flows within the town; the types of jobs offered are low level, part time and poorly paid for the most part, and completely inadequate as compared to jobs lost from the existing employment offer; all our schools are full to overflowing; and our medical centres are overstretched due to their inability to recruit sufficient medical staff.</p>	

Document Section/Site	Harbour Road/Serbert Way Portishead
------------------------------	-------------------------------------

Comment ID	Organisation	Comment	Attached documents
5211809//1	Pegasus Group	The land that is the subject to this letter presents a very strong option for addressing the issues highlight by the Inspector in ID/4.	 Site Allocations Plan (Further Site

Comment ID	Organisation	Comment	Attached documents
		<p>Suitability Assessment</p> <p>It is welcomed that the most recent assessment records that this site is at pre-application stage for an older persons housing project of 93 units. However, the assessment gives the impression that a care home is proposed. It should be made clear that self-contained units of older person's accommodation are proposed. The proposal is for 90-100 Assisted Living</p> <p>Units to meeting the needs of older people, aged 60+, all requiring a degree of care. Each unit will count toward 5-year housing land supply. The proposal will provide 11-15 FTE jobs and will provide an annual GVA contribution of £550,000 - £714,000 p.a (see Economic Impact Assessment report submitted with our hearing statements).</p> <p>A summary of pre-application actions to date is set out below. The design response to the site has been positively received and thus planning policy officers can have confidence in estimated yield:</p> <ul style="list-style-type: none"> • May 2016 – pre-application submission made and subsequent meeting with Development Control; • March 2017 – additional pre-application submission taking account of comments made in 2016 – this included a new design approach; Marketing Report by CBRE; Employment Land availability and demand report; Economic Impact Assessment of the proposed use; and Needs Assessment; • April 2017 – meeting with Neil Underhay and Simon Gregory; • June 2017 – additional submission following design comments received to the earlier revised design approach; • July 2017 – further meeting with Neil Underhay and Kieran Oliver. <p>The Council's new assessment notes that the land has a recent previous planning consent for retail unit. This indicates the policy team are aware of the former decision to approve a non-B use for the land. It is s considered that relevant extracts for the case officers report justifying the non 'B' use of the site should be included in the current site assessment. The Council previously granted planning permission for a retail store on the site, which has since lapsed (App Ref: 12/P1255/0). This followed an earlier consent in 2010. The delegated report confirms that "Although traditional B1 office</p>	<p>Assessments).msg (353 KB)</p>

Comment ID	Organisation	Comment	Attached documents
		<p>development on the site might have led to more jobs, it would seem, on balance that this is unlikely, given the length of time the site has been vacant, together with existing economic analysis of Portishead".</p> <p>The site was originally allocated in 2007 (and has been marketed since then) but is no further forward in being developed for B-class uses. Under the current ownership, the site has been marketed since October 2013 but with no interest (see CBRE report submitted with our hearing statements);</p> <p>At the April 2017 pre-application meeting, Simon Gregory questioned the extent of historical marketing by CBRE, and as a result, we have agreed with Simon to extensively market the site for a period of 6 months (advert in Estates Gazette, sign boards etc). This started at the beginning of June. To the end of August, no interest has been received from Class B users. Most interest is usually received in the first month of a new campaign. Monthly update meetings are taking place with Simon Gregory and CBRE. The minutes of the latest update meeting are attached.</p> <p>It is acknowledged that the Economic Development service will want to retain the site but advice from Hartnell Taylor Cook and CBRE suggest differently (see Employment Land availability and demand report by Hartnell Taylor Cook submitted with our hearing statement). Further, the latest phase of marketing is not yielding any interest.</p> <p>Whilst the surrounding land uses are said to be retail (Homebase, Argos, Sainsbury's), and business (the Chorus office), it should also be recorded that the neighbouring uses include and (Premier Inn). In the section on 'compatibility with surrounding uses' the assessment states "<i>Potential for compatibility issues with surrounding business/retail uses</i>". In our assessment, there are no potential compatibility issues and this should be amended. Likewise, in the section on 'features on or near to site that would influence potential' the assessment states "<i>Neighbouring business uses may influence development of this site</i>". We also dispute the justification for this. The Council can be more confident that housing would be compatible with its surroundings.</p> <p>In the section on planning policy the assessment records that although the site is within the extend town centre, that this does not preclude the allocation of the site for exclusively 'B' uses. The assessment fails to acknowledge that this on the only part of Gordano Gate that is within the town centre, which must be material to how this site is assessed in relation to other land at Gordano Gate. This is especially true in the current context, where the Inspector is looking for measures to increase the flexibility in the Plan in respect of housing, not reduce it. The reasoned justification for DM60 (Town</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Centre) encourages residential development as part of mixed use schemes using upper floors with other uses on the ground floor. However, the SAP seeks to take away that flexibility. Moreover, DM60 itself does not rule out single use projects in the town centre.</p> <p>In the ‘key action to overcome constraints’ the loss of employment land is recorded. The ‘mitigating action’ is to <i>"Retain the site as an employment allocation and specify terms in the allocation to make consistent with Policy DM60"</i>. This would seemingly be sign-posting a potential mixed use strategy within revised allocation wording would be published as part of modifications. In advance we would though observe that all the evidence on demand demonstrates that there is no demand for ‘B’ space on this site. Whilst the reasoned justification for DM60 encourages housing on upper floors in town centres, the NPPF itself (para 23: bullet 9) does not impose this constraint and simply requires LPA’s to encourage residential development on appropriate sites.</p> <p>Having regard to the other site being considered at Gordano Gate (this being outside the town centre). The ‘mitigation’ relates to 240 square metres of office use being proposed within a current, residential-led, application and that this should be a condition of the residential development. At the standard HCA jobs density of 1 office job per 12 sqm that generates around 20 jobs. Contributions towards employment elsewhere within the town are also being sought to offset the loss of the remainder of the site for employment. As previously stated Anchors proposal will provide 11-15 FTE jobs.</p> <p>Sustainability Appraisal</p> <p>As the proposed use is for older persons housing the amber grading in respect of primary educational facilities at Portishead (Sub-objective 2.2) is not relevant.</p> <p>The site is within flood zone 3a. The assessment method states that <i>Sites that are within Flood Zone 3a and may require some flood mitigation works are highlighted as "amber."</i> <i>Sites totally outside Flood Zone 3 are given a "green" rating.</i> The site is partially within Zones 1, 2 and Zone 3a. The site is graded as red. However, given that it is defended and is capable of being developed with further flood mitigation works, it is not clear why it is not graded as amber.</p> <p>Sub-objective 5.4 covers retail accessibility re the achievement of a reasonable access to sustainable transportation via proximity to a railway station. The site is recorded as amber for being within the 2km -5km band. However, as the</p>	

Comment ID	Organisation	Comment	Attached documents
		Council will know that the credentials of Portishead are set to improve and this should be recorded as part of any site assessments in the town.	
14590529//5	Persimmon Homes Severn Valley	Harbour Road/Serbert Way, Portishead – it is not clear if the proposed units on this site would be with C2 or C3 use. If these units would fall within the C2 use class then the 93 units suggested should not count towards the requirement for residential units which need to be identified in the SAP.	
4193569//2	Portishead Town Council	<p>Portishead Town Council has carefully considered the Further Sites Assessments of the Sites Allocations Plan and wishes to make the following comments:</p> <p>We do not consider that there has been strategic planning in relation to the Further Sites Assessments: it is our opinion that sites delivering less than 1000 dwellings cannot be described as strategic.</p> <p>We object in the strongest possible terms to the description “Part 2 sites broadly in conformity with the Core Strategy framework which will be assessed”. The proposed Portishead sites are certainly not in conformity with the Core Strategy. They are designated for the provision of employment as stated in the Local Development Plan and the Core Strategy that aims to ensure that towns such as Portishead develop sources of employment for local residents.</p> <p>In all the site assessments related to Portishead it is stated that “Sub-objective 5.4 Achieve reasonable access to sustainable transportation proximity of site to railway station Amber Nearest rail station is between 2 and 5 km”. This is patently untrue as there is yet to be a railway station in Portishead and it is currently more that 10kms to nearest existing station at Nailsea & Backwell.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Again in all the site assessments related to Portishead it is stated that “Sub-objective 2.2 Achieve reasonable access to a full range of educational facilities – primary education Assessment Using information from ‘Pupil Projections from North Somerset Schools 2015-2019’ Amber Primary school within settlement with limited capacity”. This is also untrue as demonstrated by the fact that 8 reception age children will begin their life at primary school in Portbury because there is no capacity for them in Portishead. This will be exacerbated by the now approved building of 94 flats at Serbert Way with a projection of an additional 21 primary places required. In effect this is one new primary school class.</p> <p>Again “Sub-objective 2.3 Achieve reasonable access to a full range of educational facilities – secondary education Assessment Using information from ‘Pupil Projections from North Somerset Schools 2015 -2019’ Green Secondary school within settlement”. There is a secondary school but the criteria fail to recognise that this school is bursting at the seams, yet again exceeding its PAL for entry in September 2017 and expecting to have a total of 2,200 students in 2018.</p> <p>With specific regard to Old Mill Road, this is an existing area of significant and thriving employment for Portishead: it provides a breadth and depth of jobs at all levels for local residents irrespective of any arbitrary planning use classes. Portishead has very little other land available for such a range of employment opportunities so it is crucial for its future sustainability that Old Mill Road continues to support all the businesses currently there.</p> <p>Other suggested sites are designated for employment but are not currently in use as such. Of those listed only one matches with its planning application number ie 17/P/1229/F; those identified as Harbour Road Gordano Gate Employment allocation, Harbour Road Serbert Way and Site V2 Harbour Road either do not have the correct planning application number or it does not exist on the web site so we are unable to view the planning content of these. Excluding Old Mill Road these sites plan a total of 231 dwellings again with significant impact on the infrastructure of Portishead.</p> <p>Old Mill Road has considerable value to the town in terms of its economy and ongoing vibrancy which we cannot afford to lose.</p> <p>It is our view that any change to the employment character of Old Mill Road would have a detrimental effect on the town: the proposal of 350 dwellings as part of a mixed use scheme would significantly impact on traffic flows within the town; the types of jobs offered are low level, part time and poorly paid for the most part, and completely inadequate as</p>	

Comment ID	Organisation	Comment	Attached documents
		compared to jobs lost from the existing employment offer; all our schools are full to overflowing; and our medical centres are overstretched due to their inability to recruit sufficient medical staff.	

Document Section/Site	Site V2, Harbour Road, Portishead
------------------------------	-----------------------------------

Comment ID	Organisation	Comment	Attached documents
5950689//11	Environment Agency	Site V2, Harbour Road, Portishead - This site is located within Flood Zone 3	
14590529//7	Persimmon Homes Severn Valley	Site V2 Harbour Road, Portishead – the development industry consortium agree that this site has the potential to deliver in 5 years.	
4193569//3	Portishead Town Council	<p>Portishead Town Council has carefully considered the Further Sites Assessments of the Sites Allocations Plan and wishes to make the following comments:</p> <p>We do not consider that there has been strategic planning in relation to the Further Sites Assessments: it is our opinion that sites delivering less than 1000 dwellings cannot be described as strategic.</p> <p>We object in the strongest possible terms to the description “Part 2 sites broadly in conformity with the Core Strategy framework which will be assessed”. The proposed Portishead sites are certainly not in conformity with the Core Strategy. They are designated for the provision of employment as stated in the Local Development Plan and the Core Strategy that aims to ensure that towns such as Portishead develop sources of employment for local residents.</p> <p>In all the site assessments related to Portishead it is stated that “Sub-objective 5.4 Achieve reasonable access to sustainable transportation proximity of site to railway station Amber Nearest rail station is between 2 and 5 km”. This is patently untrue as</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>there is yet to be a railway station in Portishead and it is currently more that 10kms to nearest existing station at Nailsea & Backwell.</p> <p>Again in all the site assessments related to Portishead it is stated that “Sub-objective 2.2 Achieve reasonable access to a full range of educational facilities – primary education Assessment Using information from ‘Pupil Projections from North Somerset Schools 2015-2019’ Amber Primary school within settlement with limited capacity”. This is also untrue as demonstrated by the fact that 8 reception age children will begin their life at primary school in Portbury because there is no capacity for them in Portishead. This will be exacerbated by the now approved building of 94 flats at Serbert Way with a projection of an additional 21 primary places required. In effect this is one new primary school class.</p> <p>Again “Sub-objective 2.3 Achieve reasonable access to a full range of educational facilities – secondary education Assessment Using information from ‘Pupil Projections from North Somerset Schools 2015 -2019’ Green Secondary school within settlement”. There is a secondary school but the criteria fail to recognise that this school is bursting at the seams, yet again exceeding its PAL for entry in September 2017 and expecting to have a total of 2,200 students in 2018.</p> <p>With specific regard to Old Mill Road, this is an existing area of significant and thriving employment for Portishead: it provides a breadth and depth of jobs at all levels for local residents irrespective of any arbitrary planning use classes. Portishead has very little other land available for such a range of employment opportunities so it is crucial for its future sustainability that Old Mill Road continues to support all the businesses currently there.</p> <p>Other suggested sites are designated for employment but are not currently in use as such. Of those listed only one matches with its planning application number ie 17/P/1229/F; those identified as Harbour Road Gordano Gate Employment allocation, Harbour Road Serbert Way and Site V2 Harbour Road either do not have the correct planning application number or it does not exist on the web site so we are unable to view the planning content of these. Excluding Old Mill Road these sites plan a total of 231 dwellings again with significant impact on the infrastructure of Portishead.</p> <p>Old Mill Road has considerable value to the town in terms of its economy and ongoing vibrancy which we cannot afford to lose.</p> <p>It is our view that any change to the employment character of Old Mill Road would have a detrimental effect on the town: the proposal of 350 dwellings as part of a mixed use scheme would significantly impact on traffic flows within the town; the types</p>	


Comment ID	Organisation	Comment	Attached documents
		of jobs offered are low level, part time and poorly paid for the most part, and completely inadequate as compared to jobs lost from the existing employment offer; all our schools are full to overflowing; and our medical centres are overstretched due to their inability to recruit sufficient medical staff.	

Document Section/Site	Old Mill Road, Portishead
------------------------------	---------------------------


Comment ID	Organisation	Comment	Attached documents						
3318017//1	-	<p>The allocation as far as this road was concerned was set at 20, a number which could well have fitted into an area in this location. We now have a pre-application for 350, with vague promises of a sum towards education.</p> <p>At one time in the not too distant past Portishead had a number of thriving businesses such as:</p> <table border="0"> <tr> <td>The nail factory</td> <td>The Paper Mill</td> <td>Albright and Wilson</td> </tr> <tr> <td>CEBG Research</td> <td>Timber Importers</td> <td>TWW Works</td> </tr> </table> <p>To name but a few, all the above have now disappeared as have the employment they offered to the residents of Portishead at a time when it had a far lower population. The development of the town over the years makes it the second largest in population in North Somerset.</p> <p>The pre-application for 350 dwellings mentions the railway. I believe everyone in Portishead will welcome the railway, but the problems and the mounting costs are making this a thing of the future = meanwhile the population has to use a bus service which is inadequate and a road network that either leads to the motorway or Clevedon. Cycling is another possibility, or, as many do use a car. So at the moment I feel that that although the railway will be a fact in some years to come it will it will not help at the moment and to give</p>	The nail factory	The Paper Mill	Albright and Wilson	CEBG Research	Timber Importers	TWW Works	
The nail factory	The Paper Mill	Albright and Wilson							
CEBG Research	Timber Importers	TWW Works							

Comment ID	Organisation	Comment	Attached documents
		<p>the impression that it is imminent is deceptive. With the ever rising rail fare will. We have to ask ourselves, be within the pocket of those that have to commute!</p> <p>The ore=application talks `airily` about shops and restaurants. Too often we have agents representing developers who know nothing about the town and do not take their job to another level to find out. A recent survey across the country shows that retail shops are closing at a rapid rate and are remaining closed. The last vacancy in the High Street in Portishead went to another charity shop, we now have SIX in the town. We are blessed with restaurants and cafes to the extent that you could visit a different one every day of the week, if not more; the same remark is relevant to the cafes in the town.</p> <p>There is talk in the submission in respect of schools. The amounts likely will not pay for a school and we already have young people being sent to other locations outside the town because we have insufficient place in schools in Portishead, this is going to be aggravated by another influx of people in the town. Should any be ill they will also have a problem to find a doctor`s list whi8ch might take them. So we have a insufficient school places and lack of health facilities before we even consider other factors. I am constantly told that these are not factors in planning, but the word `planning` means looking at all factors as a whole not one aspect in isolation, i.e. housing.</p> <p>What Portishead does not have is jobs. Having worked most of my life in retail I can guarantee to train someone with normal intelligence into becoming a reasonable shop assistant/waiter within a week. What I cannot do is train in that time scan an engineer,,mechanic, a woodturner. a driver, etc., without him/her going through an apprenticeship. And it is apprenticeships that are offered it Old Mill Road. There are offices and other small business in Portishead but none offer the width of skills available in this area. There are 294 people working in this road of which 177 ARE SKILLED.</p> <p>I have heard people say that this road needs refurbishing and for this reason those that have businesses in Old Mill Road pay to the owners a set sum yearly; the results of which have not been obvious</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>I would like to see the original allocation of 20 dwellings reinstated and this matter settled quickly as there are 294 people on site who need their future secured. To preserve this site for the future it should be designated as an 'industrial' site thus avoiding confusion in the minds of developers.</p>	
3947521//1		<p>I am most concerned that the 20 or so housing allocation, down from 100, on the Old Mill Road, Portishead, has ballooned to an application for 350 new homes.</p> <p>Whilst I understand the benefit to Standard Life's balance sheet, I see no benefit to Portishead in effectively ousting 20 well established businesses with 300 employees on their pay roles, of which almost 2/3rds are classified as Skilled workers, and so optimising an Employment Site to the full, especially with no alternative sites in the Town available.</p> <p>As I understand it, the key for the Weston's New Housing sustainability policy puts " jobs first before housing;" so how does that fit with effectively sacrificing an existing employment site for homes-effectively a policy u turn.</p> <p>Whilst an element in Standard Life's proposals may include employment opportunities factored into street level retail and bars etc , its a fact that these roles (other than the likes of John Lewis)offer minimum wage terms and contribute little to over all local prosperity, but would certainly lead to more skilled workers needing to out commute.</p> <p>Whilst maybe not of concern to Standard Life, we are already under pressure with Council Services, Highways, Education and GP services and whilst these are not strictly Planning matters, our constituents expect us to take their environment into consideration and learn lessons from the past.</p> <p>I would wish to see an undertaking accompanying this application for the Standard Life to set out how their aspirations to increase the value of this site can work can work hand in glove with the existing lessees.</p>	

Comment ID	Organisation	Comment	Attached documents				
5950689//10	Environment Agency	Old Mill Road, Portishead - This site is located within Flood Zone 3*. Additionally, the site is located adjacent to the Portbury Ditch, a Statutory Main River. Accordingly, any works within 8m of the river would require the Agency's prior approval through the Flood Risk Activities Permitting process.					
5950689//20	Environment Agency	Old Mill Road, Portishead. There is a watercourse on the periphery of the site which has the potential for otters, water voles and other protected species. Again, the Agency would recommend the provision of buffer strips to protect the watercourse, together with agreed habitat improvement measures.					
17565665//1	G L Hearn	<table border="1"> <tbody> <tr> <td>Site details - Development management status</td> <td>The Council will be aware that following discussions and engagement with officers and Councillors over the preceding 9-12 months, formal pre-application discussions have commenced.</td> </tr> <tr> <td>Site details - Indicative Capacity</td> <td>Our submission in response to Council's invitation (June 2017), to provide 'delivery information' in respect of the site, confirmed that our proposed comprehensive mixed use redevelopment of the site can provide 350 residential dwellings in addition to retail, leisure and other commercial and /or community uses.</td> </tr> </tbody> </table>	Site details - Development management status	The Council will be aware that following discussions and engagement with officers and Councillors over the preceding 9-12 months, formal pre-application discussions have commenced.	Site details - Indicative Capacity	Our submission in response to Council's invitation (June 2017), to provide 'delivery information' in respect of the site, confirmed that our proposed comprehensive mixed use redevelopment of the site can provide 350 residential dwellings in addition to retail, leisure and other commercial and /or community uses.	 170820 SAP Further Assessment_OMR comments.pdf (166 KB)
Site details - Development management status	The Council will be aware that following discussions and engagement with officers and Councillors over the preceding 9-12 months, formal pre-application discussions have commenced.						
Site details - Indicative Capacity	Our submission in response to Council's invitation (June 2017), to provide 'delivery information' in respect of the site, confirmed that our proposed comprehensive mixed use redevelopment of the site can provide 350 residential dwellings in addition to retail, leisure and other commercial and /or community uses.						



Comment ID	Organisation	Comment	Attached documents
		<p data-bbox="528 331 703 464">Site Suitability - Ecology/ Environmental</p> <p data-bbox="721 331 1738 464">A bat survey and Phase 1 ecology survey of the site have been undertaken. The bat survey concluded there are no bats present at the site. Full details of the surveys will be made available to the Council through the formal pre-application process and submitted in due course as evidence supporting our expected planning application.</p> <p data-bbox="528 549 703 647">Physical Factors - Contamination</p> <p data-bbox="721 549 1738 681">We expect any potential land contamination to be assessed and addressed as part of the application process. We are not aware of any evidence that indicates any potential contamination of the site would prevent the redevelopment of site for a mix of uses, including residential.</p> <p data-bbox="528 766 645 831">Planning Policy</p> <p data-bbox="721 766 1738 1035">Whilst the site assessment correctly identifies that residential use is in principle "<i>compatible</i>" on the site, given its location within Portishead Town Centre, national and adopted local policy supports the provision of residential use at the site. For example, paragraph 23 of the NPPF requires Local Authorities in drawing up local plans to set out policies to "<i>encourage residential development on appropriate sites</i>". At the local policy level, the reasoned justification to Policy DM60 of the NSC Development Management Policies Plan, encourages residential development as part of town centre mixed use schemes using upper floors with other uses on the ground floor.</p> <p data-bbox="721 1074 1738 1139">We also note the Council's residential site assessment for the site at Harbour Road/ Serbert Way Portishead, includes reference to the reasoned justification of Policy DM60.</p> <p data-bbox="721 1177 1738 1307">For reasons of accuracy with adopted national and local policy therefore, as well as consistency with the assessments for other sites, the site assessment for the Old Mill Road site should confirm the planning policy support for residential use at the site, rather than merely its in principle "<i>compatibility</i>".</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Key Constraint - Loss of local businesses</p> <p>It is unclear on what planning grounds the loss of local businesses is considered a key constraint.</p> <p>Our representation to the submission Local Plan outlined that the proposed expectation within Schedule 1 of the submission Site Allocations Plan, that development of the Old Mill Road site will either relocate existing businesses or incorporate existing businesses into a redevelopment scheme, is not supported by any evidence supporting, demonstrating or justifying that requirement in planning terms.</p> <p>That notwithstanding, the retail, leisure and potential other commercial uses to be provided at the site, as part of the mixed-use redevelopment of</p>	
16017473//1	G R Planning Consultancy Ltd	<p>My client's original objections to the draft Site Allocations Plan (SAP) were submitted to the Council on the 5th December 2016. A Statement in Support of those objections was submitted by us on the 21st April 2017 to Planning Inspector prior to the Examination in Public.</p> <p>My client's objections relate to Policies SA1, SA2, Schedule 1 and the allocation of the Old Mill Road (OMR) site in Portishead for mixed-use development (Site Reference SAP). In summary, these objections concluded that:</p> <p>The OMR allocation lacked any detail or reference to the quantum, layout and scale of development that would be sought within the mixed-use development</p> <p>The allocation provided no indication of whether the existing quantum of retail floorspace that exists within the Wyndham Way Retail Park (WWRP) would be retained or incorporated within any new development or would need to be relocated to an alternative site</p>	<p> Statement by HHGL Ltd in Response to Draft North Somerset Site Allocations Plan Site Assessment for Old Mill Road, Portishead 16-08-2017.pdf (409 KB)</p>

Comment ID	Organisation	Comment	Attached documents
		<p>The SAP provided no details as to the future of existing businesses, such as Bunnings (Homebase) and whether they would remain, be redeveloped or relocated</p> <p>The SAP did not identify any alternative sites that existing businesses could be relocated too if they could not be retained or incorporated within the redevelopment of the OMR site and neither were there any policies in the SAP that sought to allocate, if required, alternative retail sites for large format units</p> <p>The SAP was ‘unsound’ having regard to the policies in the NPPF</p> <p>Those objections remain outstanding.</p> <p>In the lead up to the Examination in Public, my clients informed the Programme Officer (by email dated the 11th May 2017) that they had decided not to attend the Hearings.</p> <p>This was as a result of discussions between my clients and the owners of OMR (Standard Life), where the latter had confirmed that there was no intention to redevelop the WWRP and that this modern retail development (which included Homebase) would remain as existing. On the basis of this statement and the submission of our Supporting Statement, my clients felt there was no need to attend the Hearings.</p> <p>My clients also confirmed to the Programme Officer and in turn the Planning Inspector (in the same email of the 11th May 2017) their willingness to withdraw their objections if Standard Life confirmed in writing that the WWRP would remain as existing and the draft SAP was amended to include a reference to this. No written confirmation has been forthcoming from Standard Life and my client’s objections remain outstanding.</p> <p>In relation to the Site Assessment prepared by the Council, in consultation with Standard Life, we would request that the Executive Committee, at its meeting on the 5th September 2017, consider the following submissions (retaining the same headings as in the Assessment):</p> <p>1. Site Availability – This statement is factually incorrect in that my clients lease on the Homebase store extends to September 2025 with no break clauses. If the Homebase store does form part of either Phase 1 or</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>2 of the proposed residential development (see below) then that development simply could not be delivered within the timescales indicated</p> <p>2. Site Achievability – Neither Phase 1 nor Phase 2 of the ‘planning timeline’ suggested by the developers can be achieved or delivered if either phase requires the inclusion of the Homebase store to deliver that development</p> <p>3. Key Constraint – Any ‘mitigation’ of the impact the proposed allocation will have on existing businesses should be assessed now and should be central to the Council’s acceptance of the principle of redevelopment on this site. In addition to Homebase there are a number of well-established and successful retail and commercial businesses on the OMR site that could be affected by the proposed allocation. At present, both the developers and the draft SAP are silent on the implications for those businesses, which does not amount to the proper planning of the area, is ‘unsound’ and is not compliant with those policies of the NPPF that seek to promote economic growth, retain employment land and support local jobs. Any ‘mitigation’ is a matter that the draft SAP should address now as it goes to the heart of the ‘soundness’ of the proposed allocation. It should not and cannot be left simply as a matter for any subsequent planning application</p> <p>The ‘planning timeline’ put forward by the developers envisages an outline application being submitted in October this year. The ‘Site Details’ confirm that a pre-application meeting(s) has already taken place with the Council. We have assumed that this outline application will be supported by a masterplan or similar and will seek agreement to the mix of uses and quantum of development that the site can accommodate.</p> <p>The developers will already know, therefore, which parts of the OMR site will be redeveloped and those that might be retained. This information must be included within the draft SAP to allow existing businesses and other stakeholders the opportunity to review those proposals and submit appropriate representations to the Council.</p>	

Comment ID	Organisation	Comment	Attached documents
15917377//1		<p>I can not actually believe that you are seriously considering changing a trading estate / former industrial site into yet more new homes that the residents don't want! When are you going to actually think of the people who already live here & have to commute out of town for work?? These business's are well used by locals, hence why they are successful, and of they disappear that also affects other business in the area that are suppliers to them.</p> <p>Roads - I don't know how many time you need to be told that our roads can not cope with the amount of traffic on it now, never mind over 300 more homes. As civil servants, you are here to serve us the population not feather your own nests.</p> <p>Railway - stop allowing the fantasy of the returning railway as an excuse for allowing more homes. In reality, it will only be used for commuters who travel into the centre of Bristol near Temple Meads who may currently use the bus. What about all those who have to drive to Gloucester, or Aztec West, Filton, or south on M5? The railway will be of no use the them will it?</p> <p>Business - Mixed use development? Such a misnomer - we don't need more little shops, cafes, beauty salons or hair salons with half a dozen staff paying minimum wages - we need proper well paid manufacturing, engineering, senior management roles paying minimum of £20k a year, where we don't need to travel out of town to find it. Disgraceful attitude, not everyone wants to work in Bristol or commute hundreds of miles a week to get anywhere else.</p> <p>Environment - How is all this travelling out of town for thousands of residents good for the environment? Surely NSC green credentials should be promoting decent jobs within Portishead not outside of it!</p> <p>Schools - we are already having to enlarge Gordano school to take in an additional 30 pupils per year from 2018, and some primary age children are still not getting into school near where they live & being told to put 4 year old's in a taxi! How on earth are you going to add 300 homes with possible 100 more children into our schools??? A Free School wanted to build here....who refused them their planning?! I've lived here for 12 years, and since I arrived St Barnabas was closed down and now used for other NSC departments....wonder who allowed that to happen when we needed another school building?</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Other Industrial land - well we don't have any do we because you allowed the old AP Burt site to become 90% homes. If you'd have stopped the over development of the VQ & Marina, and made sure that proper mixed use was available all over it (not over valued office space lying empty) the tenants of OMR would have had somewhere to move their business's to within the town boundary. But As usual, there is no forward panning or consultation or taking residents wants / needs into consideration is there?</p>	
15574465//1	Aston and Co.	<p>The delivery of these units, particularly those at Old Mill Road, Portishead is by no means certain; it has strong local opposition because of the proposed loss of valuable employment land which is contrary to NSDC policy. like much of Portishead it is located within tidal Flood Zone 3A and this therefore not a suitable site for development when other options exist outside of the flood zone.</p> <p>NSDC own assessment identifies the additional congestion problems this sites development would create by increasing outward commuting. Employment should be safeguarded within Portishead in accordance with sustainability principles.</p> <p>No application is registered and at best it is likely to involve an appeal. To suggest delivery of 150 units by 2020/21 is unrealistic.</p> <p>Developers are notoriously optimistic on delivery rates.</p> <p>Taken together it is unlikely that these applications combined will deliver even 1,000 new units within 5-years.</p>	<p> SAP Response_Aston_20.08.17.pdf (343 KB)</p>
15864257//2		<p>Opposed to the redevelopment of Old Mill Rd</p>	<p> FHSW response to SAP Residential Assessment.docx (2.5 MB)</p>

Comment ID	Organisation	Comment	Attached documents
17568609//1	-	<p>Having read your site assessment process regarding proposed development of the above site, I am dismayed by some of the claims included.</p> <p>Regarding traffic - the current situation is such that only people who have no other choice attempt to enter or leave Portishead during morning or evening rush hours. On one occasion doing some voluntary gardening late in the afternoon on the roundabout at the junction of Serbert Way, Wyndham Way and Quays Avenue, I was unable to leave the roundabout safely due to the volume (and speed) of the traffic.</p> <p>I am curious about the railway station mentioned in the assessment. Presumably this is Avonmouth? If so, getting there is also a challenge. If a station re-opens in Portishead that would possibly alleviate the situation somewhat, but the likelihood of that happening seems to be receding.</p> <p>Schools. As I understand it the primary schools are already fully subscribed and there was recently a letter stating that a further influx of students would result in difficulties maintaining standards. Have all the head teachers been fully consulted?</p> <p>Doctors. Our medical facilities are excellent but over-stretched. A recent attempt to make an appointment resulted in a ten day wait - and that was not with the doctor of my choice. Have the doctors been consulted?</p> <p>Employment. Why would you take away a useful area of employment and force more people to look for work outside the town, adding further to the transport problems? Instead why not develop it further for employment, and not just retail and catering but jobs which can offer apprenticeships?</p> <p>Whilst I agree that people need homes, it seems very short sighted to build more without first addressing the current infrastructure problems.</p>	
17568321//1	Acorn restorations Ltd	<p>On behalf of Acorn Restorations Ltd, I can confirm that we have a total of 7 employees - all of them skilled employees. of these - 5 employees live in Portishead.</p>	

Comment ID	Organisation	Comment				Attached documents
		Relocation is likely to involve moving to a South Wales Enterprise Area - leaving all but one employee (myself) having to travel to Newport, South Wales.				
		<u>Save Old Mill Road</u>				
		<u>North Side</u>				
		Units	Companies	No of Employess	Skilled Employees	Apprentices
		2	The Hub	18	?	--
		3	Crossfit	4	4	--
		4	Dog's Day Out	?	?	
		5	Evapor	38	12	--
		6	Bakey Wakey	?	?	
		7	Unoccupied			
		8	Ryans Garage			
			Crash Repairs	4	3	1
		8	Ryans garage	12	12	3
		8	Ryans rentals	4	2	--

Comment ID	Organisation	Comment				Attached documents	
		8 Ryans Self Storage	2	2	--		
		9-11 T&G	47	36	--		
		12 Enterprise	7	5	1		
		13 Portisbeds	?	?			
		14 Ryan's Used Cars	2	2			
		14a Powertek	10	--	--		
		<u>Save Old Mill Road</u>					
		<u>South Side</u>					
		<u>Units</u>	<u>Companies</u>	<u>No of Employees</u>	<u>Skilled Employees</u>	<u>Apprentices</u>	
		1-2	Coffeetek	80	20	2	
		1.	Epic Martial Arts	18	18	--	
		3-4	Crown	13	13	--	
		5	Playzone	?	?	--	
		8	Acorn restorations	?	?	--	

Comment ID	Organisation	Comment	Attached documents
		<p>T&G supply to the Retail and Hospitality industries. It is the only way these enterprises can operate, partly due to the unsocial hours.</p> <p>In the Sustainability Assessment for the Old Mill Road site:</p> <p><u>Item 2.2 and 2.3 Reasonable Access to a full range of Educational facilities.</u></p> <p>I understand that these institutions are over subscribed with children being bussed and taxied to other towns. It has been the success of the recent past development of Portishead, with a population growth from around 15K to 25K with no cap. This proposal will increase the pressure and until more investment has been provided for improving and increasing the infrastructure; there has to be a pause while this takes place.</p> <p><u>Item 2.4 Provide opportunities for people to work locally.</u></p> <p>I am not sure that those with degrees and other qualifications want to work in a shop or in a restaurant because that is what is on offer from Standard Life. By adding to the employment needs with more dwellings and at the same time removing the sort of jobs that pay enough for a mortgage as opposed to part tome, low paid work is absurd.</p> <p><u>Item 5.4 Proximity to a railway station.</u></p> <p>The sustainability Assessment claims there is a station 2 to 5km from Portishead. There is no station in Portishead and with at least 20 years of discussion and no future positive date this should be marked as a red sector.</p> <p>The nearest railway station is Shirehampton (across the river Avon) at 9.98 km by road. Nailsea is even further at 10.14 km. Both stations are considerably over 5 km as the crow flies.</p> <p>Houses are required but as has been stated there is plenty of land with planning agreed but the developers are dragging their feet as the timing and economic conditions are projected to become worse so the land will not be developed until conditions improve.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>It should concern everyone who has a commitment to the future of North Somerset, Portishead in particular, that developers such as Standard Life (based in Edinburgh) have no interest other than to increase their returns on investment. Can they prove that they will be ready to start in 2019 having pulled the leases on Old Mill Road, producing local unemployment and as usual, demolishing the buildings in order to avoid paying Council Tax at the same time leaving the site derelict, waiting for better times!</p> <p>Standard Life’s claims to say their proposals will be good for Portishead are rather disingenuous. The councillors and their officers only need to inspect Old Mill Road to see there has been no attempt (in my 40 years tenancy) to improve the look and desirability of this site. Why would they? It would have cost money and Portishead from Edinburgh is “out of site, out of mind”. These developers have a “Slash and Burn” approach to development change. Their sole interest is the percentage yield for a site that is a long way from their home in Edinburgh.</p> <p>If this site can be designated an area for employment only, it will help those other areas for development for which there is already planning permission where there are not the issues, as in Old Mill Road, therefore continuing Full Time, Skilled employment opportunities.</p> <p>Rumour has it that during Standard Life’s pre-planning consultation that they will deliver a School and Medical Centre. They can arrange for the buildings to be produced but it is Teachers, Doctors and Nurses that are required. I do not believe Standard Life have these employment skills!</p> <p>At a council meeting 24th January where the public are invited to speak before proceedings, an interested member of the public spoke on the urgent need to provide more doctors to fill the <u>existing</u> medical centres because of the acute shortage. None of this is easy for the council but Standard Life’s offer is an empty promise that still leaves the council with providing doctors, nurses, teachers, etc.</p> <p>I hope that the council are better able to see a bright future for Portishead than that offered by Standard Life by creating enough hurdles for SLI to consider other avenues for their investments.</p> <p><u>Save Old Mill Road</u></p>	

Comment ID	Organisation	Comment				Attached documents
		<u>North Side</u>				
		Units	Companies	No of Employess	Skilled Employees	Apprentices
		2	The Hub	18	?	--
		3	Crossfit	4	4	--
		4	Dog's Day Out	?	?	
		5	Evapor	38	12	--
		6	Bakey Wakey	?	?	
		7	Unoccupied			
		8	Ryans Garage			
			Crash Repairs	4	3	1
		8	Ryans garage	12	12	3
		8	Ryans rentals	4	2	--
		8	Ryans Self Storage	2	2	--
		9-11	T&G	47	36	--
		12	Enterprise	7	5	1

Comment ID	Organisation	Comment				Attached documents
13	Portisbeds	?	?			
14	Ryan's Used Cars					
			2	2		
14a	Powertek	10		--	--	
<u>Save Old Mill Road</u>						
<u>South Side</u>						
<u>Units</u>	Companies	No of Employees		Skilled Employees	Apprentices	
1-2	Coffeetek	80		20	2	
	1. Epic Martial	18		18	--	
	Arts					
3-4	Crown	13		13	--	
5	Playzone	?		?	--	
8	Acorn restorations	?		?	--	
<u>Totals</u>						
at 9th, November 2016		259		129	7	

Comment ID	Organisation	Comment	Attached documents
		<p>There are several employee numbers missing, say 15 .</p> <p>The total is around 274. Too much for the council to accept as collateral damage!</p> <p>The Estate unit numbers may not be accurate but this gives a picture.</p>	
14590529//15	Persimmon Homes Severn Valley	<p>Old Mill Road, Portishead - the development industry consortium agrees that, if this site is this site is identified for development in the SAP, then it has the potential to commence delivery in the first 5 years.</p>	
4193569//4	Portishead Town Council	<p>Portishead Town Council has carefully considered the Further Sites Assessments of the Sites Allocations Plan and wishes to make the following comments:</p> <p>We do not consider that there has been strategic planning in relation to the Further Sites Assessments: it is our opinion that sites delivering less than 1000 dwellings cannot be described as strategic.</p> <p>We object in the strongest possible terms to the description “Part 2 sites broadly in conformity with the Core Strategy framework which will be assessed”. The proposed Portishead sites are certainly not in conformity with the Core Strategy. They are designated for the provision of employment as stated in the Local Development Plan and the Core Strategy that aims to ensure that towns such as Portishead develop sources of employment for local residents.</p> <p>In all the site assessments related to Portishead it is stated that “Sub-objective 5.4 Achieve reasonable access to sustainable transportation proximity of site to railway station Amber Nearest rail station is between 2 and 5 km”. This is patently untrue as there is yet to be a railway station in Portishead and it is currently more that 10kms to nearest existing station at Nailsea & Backwell.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Again in all the site assessments related to Portishead it is stated that “Sub-objective 2.2 Achieve reasonable access to a full range of educational facilities – primary education Assessment Using information from ‘Pupil Projections from North Somerset Schools 2015-2019’ Amber Primary school within settlement with limited capacity”. This is also untrue as demonstrated by the fact that 8 reception age children will begin their life at primary school in Portbury because there is no capacity for them in Portishead. This will be exacerbated by the now approved building of 94 flats at Serbert Way with a projection of an additional 21 primary places required. In effect this is one new primary school class.</p> <p>Again “Sub-objective 2.3 Achieve reasonable access to a full range of educational facilities – secondary education Assessment Using information from ‘Pupil Projections from North Somerset Schools 2015 -2019’ Green Secondary school within settlement”. There is a secondary school but the criteria fail to recognise that this school is bursting at the seams, yet again exceeding its PAL for entry in September 2017 and expecting to have a total of 2,200 students in 2018.</p> <p>With specific regard to Old Mill Road, this is an existing area of significant and thriving employment for Portishead: it provides a breadth and depth of jobs at all levels for local residents irrespective of any arbitrary planning use classes. Portishead has very little other land available for such a range of employment opportunities so it is crucial for its future sustainability that Old Mill Road continues to support all the businesses currently there.</p> <p>Other suggested sites are designated for employment but are not currently in use as such. Of those listed only one matches with its planning application number ie 17/P/1229/F; those identified as Harbour Road Gordano Gate Employment allocation, Harbour Road Serbert Way and Site V2 Harbour Road either do not have the correct planning application number or it does not exist on the web site so we are unable to view the planning content of these. Excluding Old Mill Road these sites plan a total of 231 dwellings again with significant impact on the infrastructure of Portishead.</p> <p>Old Mill Road has considerable value to the town in terms of its economy and ongoing vibrancy which we cannot afford to lose.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>It is our view that any change to the employment character of Old Mill Road would have a detrimental effect on the town: the proposal of 350 dwellings as part of a mixed use scheme would significantly impact on traffic flows within the town; the types of jobs offered are low level, part time and poorly paid for the most part, and completely inadequate as compared to jobs lost from the existing employment offer; all our schools are full to overflowing; and our medical centres are overstretched due to their inability to recruit sufficient medical staff.</p>	
4193569//7	Portishead Town Council	<p>Portishead Town Council writes to object strongly to the inclusion of 350 dwellings at Old Mill Road as being “broadly in conformity with the Core Strategy framework”. We call upon the Executive Member responsible for this document to withdraw any reference to this number of dwellings on land allocated for employment. As a town that has absorbed so much development over recent years with little extra employment we cannot afford to lose any site with existing employment.</p>	
15925857//1		<p>I write with concern to the potential development of Old Mill Road, Portishead. Infrastructure in Portishead is dire; roads are highly congested, doctors' surgeries and schools are at capacity. More residential development would create an unreasonable burden on the town. The site currently provides local jobs and local services. It is essential that these jobs and services be preserved.</p> <p>The assessment states that there is a rail station within 2 - 5 k. Do they refer to the facility which may be built at Portishead at some stage in the future? If not, this is incorrect. Portishead residents are relying on councillors to ensure that Old Mill Road continues to provide the existing services, and is not swamped by further residential development.</p>	
17470337//1		<p>I would like to point out a number of inaccuracies in the above document, and would request that it be reissued with the correct information before being considered by the Executive Committee.</p>	

Comment ID	Organisation	Comment	Attached documents
		<ol style="list-style-type: none"> 1. Sub-objective 1.4 Achieve reasonable access to healthcare facilities - The document states, correctly, <i>"GP surgery and other healthcare facilities provided in settlement"</i>, but fails to mention that both GP surgeries are close to capacity in terms of numbers of patients, and it is already extremely difficult for existing patients to see a GP at anything less than a few weeks' notice. 2. Sub-objective 2.2 Achieve reasonable access to a full range of educational facilities – primary education Assessment Using information from ‘Pupil Projections from North Somerset Schools 2015 -2019’ - These projections have previously been proven to be inaccurate, during the consultation period for the expansion of High Down Schools and, whilst the SAP shows the settlement has a primary school with limited capacity, it doesn't mention that there is already a severe shortage of primary school places within Portishead, with a number of children from the town already having to be schooled out of Portishead. This point follows on to the next point... 3. Sub-objective 2.3 Achieve reasonable access to a full range of educational facilities – secondary education - There is only one secondary school in the town, which is already oversubscribed, and has no physical space left to expand without taking away the little outdoor space left. 4. Sub-objective 2.4 Provide opportunities for people to work locally - The SAP states that this is Green, with <i>"Good access to a wide range of local job opportunities within settlement"</i>, yet fails to mention that a good number of the businesses in the town, currently employing local people, will be closed down as a result of this development, leaving even fewer employment opportunities. 5. Sub-objective 4.8 Minimise impacts on air quality through locating development in locations least likely to contribute to traffic congestion - The SAP states that the development <i>"could"</i> add to highway issues. I can only assume this is a joke, as a development of this size will obviously add to the already overstretched roads in and out of the town. The congestion at rush hour and around school times is already at an unacceptable level, so adding potentially up to 700 extra vehicles can not fail to have a negative impact. It is ridiculous to think otherwise. 6. Sub objective 5.1 Achieve reasonable access to sustainable transportation - frequency of bus services - <i>"Green Urban (Weston Town Centre): 15 or less mins. Suburban (Clevedon, Nailsea and Portishead): 30 or less mins. Villages: 60 or less mins."</i> - No mention of Bristol, which is the closest city, and where a huge majority of residents that have to commute out of the town go to 	

Comment ID	Organisation	Comment	Attached documents
		<p>work. There is also no mention of the problems getting a reasonable bus service to anywhere from and within Portishead since First Buses changed the timetables to cut costs.</p> <p>7. Sub-objective 5.4 Achieve reasonable access to sustainable transportation - proximity of site to railway station - According to the SAP, the nearest railway station is "<i>between 2 and 5km</i>" Really?? Where exactly is the railway station you are talking about? There is one slightly less than 5km away as the crow flies, but as residents have no way to get there other than by road, it is actually close to 10km away. <u>This is a crucial piece of information that appears to have been designed to mislead, and is completely inaccurate.</u></p> <p>I look forward to seeing an amended and accurate Site Allocations Plan on the website as soon as possible.</p>	
17568705//1		<p>With all that is said , do people look at , 1 - 350 Houses etc Old Mill Road , 2 - 93 flats etc , Harbour Road , so that could put almost 1000 extra car's in the Village (Town) more work for Doctors / Schools and let alone the problems getting in and out of Portishead , But it's ok there is a Train and Station on it's way Ya !!! dream on we can all live in Hope , sorry NSC , IT'S TIME TO SHUT THE BORDER's in PORTISHEAD , LIKE Great Britan We are FULL . There are other spot's Help Clevedon out before it become's a Ghost Town , its sad i say this , as it's my Birth Place and i still love it . They need shops for people in the Village , Draw people in then Houses and Job's and while NSC are at it Make sure that those that could and might well loose there Job's and Trades In Portishead are Looked after .</p>	
17466337//1		<p>With regards to "Sub-objective 5.4: Achieve reasonable access to sustainable transportation- proximity of site to railway station" on this assessment as well as "Site V2, Harbour Road, Portishead" and possibly others in Portishead:</p> <p>From what I can see, both are marked as between 2 and 5km from a rail station. I assume this means Avonmouth Station, which is 4.8km away as the crow flies.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>It fails to mention that this station is 9.1km away by bike, 9.8km away by motorway, and a massive 24.5km away avoiding motorway or by bus. Those also use an overutilised and often congested A369 link to Junction 19.</p> <p>Not to mention that it's a station with limited service, bike and car parking in the single digits, and no facilities or ticket buying whatsoever.</p> <p>The relevance of this station to "[a]chieve reasonable access to sustainable transportation" is laughable. While these reports may be strictly correct, they're disingenuous at best.</p>	

Document Section/Site	Land at Wyndham Way, Portishead
------------------------------	---------------------------------

Comment ID	Organisation	Comment	Attached documents
5950689//8	Environment Agency	Land at Wyndham Way, Portishead – This site is located within Flood Zone 3*.	
17569121//1	Pegasus Planning	<p>CBRE have provided us with the attached minutes, which confirm that the interest received so far has been wholly for alternative uses other than B-Class employment Uses. This, therefore fully supports our position that there is no likelihood of the site coming forward for a B-Class Uses in line with the original proposed re-allocation.</p> <p>The marketing campaign is on-going, but we hope that this provides a useful update for the consideration of this site and its appropriate status within the emerging Site Allocations Plan.</p>	
14590529//16	Persimmon Homes Severn Valley	Land at Wyndham Way, Portishead – the development industry consortium agrees that this site has the potential to deliver in 5 years.	

Comment ID	Organisation	Comment	Attached documents
4193569//5	Portishead Town Council	<p>Portishead Town Council has carefully considered the Further Sites Assessments of the Sites Allocations Plan and wishes to make the following comments:</p> <p>We do not consider that there has been strategic planning in relation to the Further Sites Assessments: it is our opinion that sites delivering less than 1000 dwellings cannot be described as strategic.</p> <p>We object in the strongest possible terms to the description “Part 2 sites broadly in conformity with the Core Strategy framework which will be assessed”. The proposed Portishead sites are certainly not in conformity with the Core Strategy. They are designated for the provision of employment as stated in the Local Development Plan and the Core Strategy that aims to ensure that towns such as Portishead develop sources of employment for local residents.</p> <p>In all the site assessments related to Portishead it is stated that “Sub-objective 5.4 Achieve reasonable access to sustainable transportation proximity of site to railway station Amber Nearest rail station is between 2 and 5 km”. This is patently untrue as there is yet to be a railway station in Portishead and it is currently more that 10kms to nearest existing station at Nailsea & Backwell.</p> <p>Again in all the site assessments related to Portishead it is stated that “Sub-objective 2.2 Achieve reasonable access to a full range of educational facilities – primary education Assessment Using information from ‘Pupil Projections from North Somerset Schools 2015-2019’ Amber Primary school within settlement with limited capacity”. This is also untrue as demonstrated by the fact that 8 reception age children will begin their life at primary school in Portbury because there is no capacity for them in Portishead. This will be exacerbated by the now approved building of 94 flats at Serbert Way with a projection of an additional 21 primary places required. In effect this is one new primary school class.</p> <p>Again “Sub-objective 2.3 Achieve reasonable access to a full range of educational facilities – secondary education Assessment Using information from ‘Pupil Projections from North Somerset Schools 2015 -2019’ Green Secondary school within settlement”. There is a secondary school but the criteria fail to recognise that this school is bursting at the seams, yet again exceeding its PAL for entry in September 2017 and expecting to have a total of 2,200 students in 2018.</p> <p>With specific regard to Old Mill Road, this is an existing area of significant and thriving employment for Portishead: it provides a breadth and depth of jobs at all levels for local residents irrespective of any arbitrary planning use classes.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Portishead has very little other land available for such a range of employment opportunities so it is crucial for its future sustainability that Old Mill Road continues to support all the businesses currently there.</p> <p>Other suggested sites are designated for employment but are not currently in use as such. Of those listed only one matches with its planning application number ie 17/P/1229/F; those identified as Harbour Road Gordano Gate Employment allocation, Harbour Road Serbert Way and Site V2 Harbour Road either do not have the correct planning application number or it does not exist on the web site so we are unable to view the planning content of these. Excluding Old Mill Road these sites plan a total of 231 dwellings again with significant impact on the infrastructure of Portishead.</p> <p>Old Mill Road has considerable value to the town in terms of its economy and ongoing vibrancy which we cannot afford to lose.</p> <p>It is our view that any change to the employment character of Old Mill Road would have a detrimental effect on the town: the proposal of 350 dwellings as part of a mixed use scheme would significantly impact on traffic flows within the town; the types of jobs offered are low level, part time and poorly paid for the most part, and completely inadequate as compared to jobs lost from the existing employment offer; all our schools are full to overflowing; and our medical centres are overstretched due to their inability to recruit sufficient medical staff.</p>	

Document Section/Site	Land south of Cadbury Garden Centre, Congresbury
------------------------------	--

Comment ID	Organisation	Comment	Attached documents
7688737/12	Congresbury Parish Council	Village extension - service village Land south of Cadbury Garden Centre, Congresbury 21 Application registered 16/P/2982/O – The Parish Council agree that this is a sustainable site but still have concerns with regard to the highway access. Congresbury Neighbourhood Development Plan is at the stage of looking at possible sites and the Steering Group is considering adjacent land to this site for inclusion as it is also a sustainable site.	

Comment ID	Organisation	Comment	Attached documents
14590529//20	Persimmon Homes Severn Valley	South of Cadbury Garden Centre – the development industry consortium agree that this site has the potential to deliver in 5 years.	



Document Section/Site Broadleaze Farm, Winscombe

Comment ID	Organisation	Comment	Attached documents
5950689//3	Environment Agency	Broadleaze Farm, Winscombe – This site is located within Flood Zone 3*. The Agency has previously objected to a proposed development at this site however, if any buildings and associated drainage works are located out of the designated floodplain, development may be appropriate.	
5950689//15	Environment Agency	<p>The above site is either in proximity to, or within the Mendip Hills AONB and therefore have the potential to cumulatively impact on the designated area.</p> <p>If any developments include crossings, or buildings adjacent to the Towerhead Brook or Lox Yeo watercourses, provisions i.e. buffer strips, will be required to protect the watercourse(s), together with agreed habitat improvement measures, including Otter passes etc. The Agency has a presumption against the culverting of watercourses.</p> <p>For information, the Towerhead Brook and adjacent land is a Local Wildlife Site and the Cheddar Valley Railway Walk is a Local Nature Reserve.</p>	
17400321//1	Walsingham Planning	<p>The identification of our client’s land interests at Broadleaze Farm, Winscombe is welcomed through this consultation process.</p> <p>We can confirm that the land remains available and proposals could be progressed quickly in order to contribute to the housing land supply. Indeed an application is already in the pipeline.</p>	

Comment ID	Organisation	Comment	Attached documents
14590529//21	Persimmon Homes Severn Valley	Broadleaze Farm, Winscombe – The application is contrary to Policy CS32 of the Core Strategy. The site is in close proximity to the Mendip Hills AONB and has potential to cause adverse impact to it. Potential access issues (legal) to address. We also note that there are drainage constraints.	

Document Section/Site

Co-housing project, St Andrews, Congresbury

Comment ID	Organisation	Comment	Attached documents
5950689//4	Environment Agency	Co-Housing Project, Congresbury – This site is located within Flood Zone 3*. Additionally, the site is at risk from a potential reservoir breach. Accordingly, the Agency must advise against ground floor sleeping accommodation within the reservoir inundation zone. The Council’s Civil Contingencies Officer/Emergency Planning Officer should be consulted in respect of this proposed allocation.	
14590529//22	Persimmon Homes Severn Valley	Co-housing Congresbury - the development industry consortium agree that this site has the potential to deliver in 5 years.	
17568065//1	Walsingham Planning	We write on behalf of our client St. Congar Community Cohousing Ltd. in connection with the Council’s consultation on its further residential site assessments.	 St Congar pre app L 27.07.17.pdf (265 KB)  24374 PL- 03e




Comment ID	Organisation	Comment	Attached documents
		<p>We are pleased to note that our client's proposed cohousing project at St. Andrew's, Congresbury is included in the schedule of sites considered as being broadly in conformity with the Core Strategy framework, for consideration at Executive Committee on 5th September 2017.</p> <p>The pre-application consultation process to which the assessment refers – ref. 17/P/0763/PRE – is ongoing, and we have recently submitted a revised concept layout for the site and further information (please see attached). This is important in the context of the Council's Sustainability Assessment of our client's site, which identifies potential harm to heritage assets. The revised proposals seek to minimise impacts on heritage assets, by removing dwellings from the Vicarage gardens for instance. We ask that this additional material is taken into account and drawn to the attention of the Executive Committee.</p>	Concept Layout.pdf (1.1 MB)

Document Section/Site	Land adjoining Coombe Farm, Winscombe
------------------------------	---------------------------------------

Comment ID	Organisation	Comment	Attached documents
5950689//16	Environment Agency	<p>The above site is either in proximity to, or within the Mendip Hills AONB and therefore have the potential to cumulatively impact on the designated area.</p> <p>If any developments include crossings, or buildings adjacent to the Towerhead Brook or Lox Yeo watercourses, provisions i.e. buffer strips, will be required to protect the watercourse(s), together with agreed habitat improvement measures, including Otter passes etc. The Agency has a presumption against the culverting of watercourses.</p> <p>For information, the Towerhead Brook and adjacent land is a Local Wildlife Site and the Cheddar Valley Railway Walk is a Local Nature Reserve.</p>	
14590529//23	Persimmon Homes Severn Valley	Coombe Farm, Winscombe – the development industry consortium agree that this site has the potential to deliver in 5 years.	

Comment ID	Organisation	Comment	Attached documents
3342657//1	Hoddells Associates	<p><u>Coombe Farm, Winscombe</u></p> <p>It should be noted that this site was included in the HELAA 2014, under site ref HE 1431 and is the subject of an extant request for pre-application advice. Access can be provided if required to land to the north.</p> <p>In summary, this site is broadly compliant with core strategy policy (in particular CS32); can be designed and developed sensitively to mitigate any potential impacts; and can be brought forward by Vowles so as to deliver much needed housing within the next 5 years and so should now be duly allocated for housing.</p>	
2596033//2	Winscombe and Sandford Parish Council	Although included, it was thought that sites at Coombe Farm and Shipham Lane had previously been refused approval by a Government Inspector around 2000/2001	



Document Section/Site	Land at Shipham Lane, Winscombe
------------------------------	---------------------------------

Comment ID	Organisation	Comment	Attached documents
10412609//1	David James & Partners Ltd	Support the inclusion of this site including the small parcel of land that lies within the AONB	<p> DOC210817-21082017142158.pdf (484 KB)</p> <p> DOC210817-21082017141610.pdf (376 KB)</p> <p> JTPlan18aug17.pdf (718 KB)</p>
5950689//17	Environment Agency	The above site is either in proximity to, or within the Mendip Hills AONB and therefore have the potential to cumulatively impact on the designated area.	

Comment ID	Organisation	Comment	Attached documents
		<p>If any developments include crossings, or buildings adjacent to the Towerhead Brook or Lox Yeo watercourses, provisions i.e. buffer strips, will be required to protect the watercourse(s), together with agreed habitat improvement measures, including Otter passes etc. The Agency has a presumption against the culverting of watercourses.</p> <p>For information, the Towerhead Brook and adjacent land is a Local Wildlife Site and the Cheddar Valley Railway Walk is a Local Nature Reserve.</p>	
14590529//24	Persimmon Homes Severn Valley	Shipham Lane, Winscombe – the development industry consortium agree that this site has the potential to deliver in 5 years.	
3342657//2	Hoddells Associates	<p>1 As the Council’s assessment notes, this site was identified in the HELAA 2014 under site reference HE 1453 and has also previously been the subject of pre-application advice.</p> <p>2 Reference is made in the assessment to the fact that part of the site, as assessed by the Council, falls within the AONB. Vowles owns/controls the land within the site but excluding that which lies inside the AONB. As such, Vowles is prepared and can bring forward its land for early development and considers that, by careful design and layout, no significant or material impacts would arise in respect of the AONB.</p> <p>3 As the assessment notes, Vowles also owns/controls Coombe Farm to the south (see below) together with the intervening land (identified in the HELAA 2014 under site ref HE 14256) which would permit, if required, access to be brought to this land.</p> <p>The site is broadly compliant with core strategy policy (in particular CS32); can be designed and developed sensitively to mitigate any potential impacts; and can be brought forward by Vowles so</p>	

Comment ID	Organisation	Comment	Attached documents
		as to deliver much needed housing within the next 5 years and so should now be duly allocated for housing.	
2596033//1	Winscombe and Sandford Parish Council	Although included, it was thought that sites at Coombe Farm and Shipham Lane had previously been refused approval by a Government Inspector around 2000/2001	

Document Section/Site	Land south of Bristol Road, Churchill
------------------------------	---------------------------------------

Comment ID	Organisation	Comment	Attached documents
14402625//1	Edward Ware Homes	<p>I write on behalf of my clients Edward Ware Homes who have a land interest on Land south of Bristol Road, Churchill which has been the subject of further residential site assessment by the Council. We write ahead of the consultation deadline of 21st August to set out in writing our views in relation to both the assessment process and the individual site assessment in respect of the above site.</p> <p>Overview</p> <p>Having reviewed the assessments for all the assessed sites it is not 100% certain the Council's definitive view on several these sites, though we accept the final decision to allocate rests with members. What is clear is that the Councils assessment raises significant concerns regarding several sites, particularly in relation to the larger options considered (e.g. Land north of Youngwood Lane, Nailsea and Land west of the M5, Locking Parklands).</p> <p>We do not comment at this point on the individual assessments for those sites, however we are concerned that the Council's review has been significantly constrained by the options it has assessed and therefore it may well have missed significant</p>	<p> Pegasus -land s of Churchill Road.pdf (437 KB)</p> <p> TPA land s of Churchill Rd.pdf (1.5 MB)</p>

Comment ID	Organisation	Comment	Attached documents
		<p>opportunities by taking a narrow view in sites to be reassessed. We believe that there are other suitable parcels of land available across the District which should have been assessed to ensure the most suitable land is brought forward for development.</p> <p>JSP Conflict Turning specifically to the site assessment for Land south of Bristol Road, Churchill. The overall conclusion of the Council’s assessment is that: “Site should not be allocated through the SAP ahead of the wider strategic Planning context and proposals for transport infrastructure are confirmed. Any potential should be considered through the new Local Plan.” We strongly disagree with this assessment. Given that the potential conflict is related to the delivery of transport infrastructure we have sought the views of TPA, Bristol. We append their views to this statement and summarise the key points below.</p> <p>APPENDIX 1 – TPA OPINION 17/08/2017 As the assessment notes the site has been the subject of pre-application engagement and is now the subject of a planning application (ref 17/P/1200/O). The pre-application meeting and feedback was provided in early January 2017 with the application validated on 15th May 2017. Both activities followed the West of England Joint Spatial Plan: Towards the Emerging Spatial Strategy consultation which ended on 19th December 2016. Indeed, the preapplication response referred to the fact that this site was located within an area identified for potential new transport infrastructure. The pre-application response did not discourage an application based on potential conflict with the JSP.</p> <p>The key point is that the JSP identifies the site as being within an area potentially required to deliver new transport infrastructure. The JSP is still at an early stage with many components, including projects identified within the Emerging Joint Transport Strategy, having limited detail or information provided about them to ascertain detailed requirements or land needs.</p> <p>As noted above further detailed considerations on transported related matters are considered by our transport consultants which is appended to this statement. In summary, the key points are:</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>The alignment of a new road around Churchill/Langford, if indeed it is required, has not yet been determined and any alignment shown within consultation documents to date are indicative.</p> <p>The JSP also highlights the possibility of a new Junction 21A on the M5 with a new strategic connection between the M5 and Churchill. There is no commitment to the nature of these improvements or when they would be delivered.</p> <p>The assessment confirms there are “no anticipated highway capacity issues” with the highway network associated with the site a point shared by the Transport Statement accompanying the current application. As such improvements are not required now or in response to the current application.</p> <p>There is no mention of the need for improvements at the junction or for a ‘bypass’ around the village in the Joint Local Transport Plan (LTP), dated March 2011.</p> <p>The site assessment suggests that ‘existing highway bordering the site may influence development potential, particularly taking into account future potential for any works to this junction.’ Initial design and capacity assessment work suggests that the junction between the A38, A368 and Dinghurst Road is currently operating within capacity. Our transport consultants (TPA) have prepared two indicative junction arrangements which can both be accommodated within available land and these are provided at Appendix 1: Option 1: larger signalised junction (Ref: 1610-97_SK04); and Option 2: a roundabout junction (Ref: 1610-97_SK05). As such either of these two options or other suitable options/hybrids of the above could easily be delivered without needing land associated with the application site. As such we consider that the Council’s assessment that our clients land should not be allocated due to conflicts with potential JSP transport requirements are fundamentally flawed and based on a series of assumptions which have not been appropriately evaluated by the Council.</p> <p>Connectivity</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Sub-objective 5.3 suggests that the site has “poor links to the surrounding area i.e. no pavement or cycleway, need to cross busy road to access facilities”. Again, we do not consider this to be an accurate assessment given that a footway is to be provided along the site frontage which will connect into the existing footway network. A crossing of the Bristol Road is also proposed as part of the application proposals. Such a crossing point would be in addition to that secured as part of the Says Lane permission (reference 15/P/1313/O). Connections for existing and future residents are therefore considered appropriate. Clearly such improvements could feature as a requirement of any potential allocation.</p> <p>Flood Risk</p> <p>The site assessment notes that the site is outside of Flood Zone 3. This is correct but what it doesn’t state is that the application site is wholly within Flood Zone 1. The wider point to which the assessment is referring i.e. off-site surface water issues. The application is accompanied by a Flood Risk and Drainage Assessment undertaken by Clive Onions which confirms that an appropriately designed drainage scheme can be provided within the site to deal with the proposed development.</p> <p>The surface water issues relate to land outside of the application site and are not generated through the development of this site. As the submitted Flood Risk Assessment demonstrates the development of our client’s land would not exacerbate this issue further. Indeed, the applicants through their experience at their Say’s Lane site, also in Churchill, have a good understanding of the causes of the A38 carriageway issues and are working with appropriate bodies to help resolve.</p> <p>Conclusion</p> <p>It is important to note that this land is being promoted by our clients, who have a developer ready to take the site forward. The site is therefore available and deliverable within the next 5 years. Our clients have fundamental concerns with regards to the Council’s approach to the identification and assessment of necessary additional sites. Whilst these issues have been touched on above we reserve the right to comment on these again when modifications on the SAP are consulted upon later this year. More specifically to the Land south of Bristol Road, Churchill site the Council’s assessment is fundamentally flawed. Great weight is given by the Council to emerging JSP potential requirements. These requirements are not yet fully defined and may never emerge. The existing junction is operating within capacity limits at present and we have demonstrated that junction enhancements to accommodate forecast growth can be delivered using land within the control of the Highway Authority, North Somerset Council or Churchill Parish Council. Thus, improvement works would not need to take place on land proposed within the application/allocation red line, as such there is no conflict issue.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Equally the Council's assessment of the pedestrian connectivity of site is also flawed and does not take account of the proposed masterplan layout and the delivery of suitable crossing points along the A38 secured by existing consents or indeed as proposed by the current application.</p> <p>Based on the above we respectfully request that the Council reassess its position in respect of this site and resolves to recommend that members allocate this site for residential development. Should you wish to discuss this site further please do not hesitate to contact me in the first instance.</p>	
14590529//25	Persimmon Homes Severn Valley	South of Bristol Road, Churchill – We note that there is a flood risk objection to this site but the development industry consortium agree that this site has the potential to deliver in 5 years.	

Document Section/Site

Land at Cox's Green, Wrington

Comment ID	Organisation	Comment	Attached documents
14819425//1		<p>I am writing to formally object to the notion that the land to the south of Cox's green (Wrington) be considered for consideration of further sites in the allocation. I object to the following assessment criteria NSC have scored the site:</p> <p>Primary school access /ability to expand is rated GREEN by NSC yet the school is full, has been for many years, local village children are often not able to get into the school and have to be bused to neighbouring schools. I am interested to see what NSC feel the expansion provision would be for Wrington school given that the school currently operates out of porta-cabins due to lack of funding for a new school to be built on site. The chances of the children from this land site being awarded places at Wrington school re very low. I feel the core should therefore be amber if not red.</p> <p>Employment opportunities rated as Green by NSC. Whilst there is low paid labour jobs (bar staff, cleaning jobs etc) there are no local employment opportunities that would bring an income in that would sustain a mortgage for the type of houses</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>proposed to be developed on this land. In reality residents would need to travel by car to find employment that paid enough for their cost of living in said houses to be met.</p> <p>Sub- objective 2.5 scored green- this site lies outside of the settlement boundary a distance from the village that many would find difficult to manage on foot.</p> <p>Sub-objective 4.3 scored by NSC as amber. This site is clearly visible from many points on the mendips (an AOAB) which if developed would create a significant impact on the vista and impact on the local environment. I feel this should be scored red especially in view of the fact that opening this area of land to development will leave NSC wide open to further developments that will contribute to a permanently altered landscape vista from the mendips.</p> <p>Sub-objedctive 4.6- it is preposterous that NSC rate this site as green as despite technically being outside of flood zone 3, this area of Wrington is known by NSC and the emergency services to be a site that regularly (i.e. at least once a year) floods to a degree that means residents are cut off by road. Emergency service vehicles are unable to access the site and people's homes are damaged. Building on this site will mean residents are cut off by road for periods of the year where even emergency vehicles could not get to them. NSC then rates sub-objective 4.7 as RED...thus highlighting my point regarding 4.6.</p> <p>Sub objection 5.2 again whilst on paper this point could score green as there is a bus stop within 400m, the buses do not run at a frequency or time of day to enable anyone to use said "sustainable transport" for commuting purposes or to access further transport links. The buses don't run on a Sunday, run hourly but only from 8am and finish early in the evening. It is irresponsible to suggest that this heavily subsidised sparse bus service represents "sustainable transport". The site would therefore be inhabited by residents needing to use a car and thus adding to highway use. Sub objection 5.4 as scored RED by NSC highlights this point.</p> <p>I would very much like NSC to argue that whilst the site has to be included in the site allocation considerations (due to potential proposed developers wanting the land) it is a highly unsuitable site that should be dismissed for the reasons stated above.</p>	

Comment ID	Organisation	Comment	Attached documents
5950689//18	Environment Agency	<p>Land at Cox's Green, Wrington.</p> <p>There is the potential for protected species to use the watercourse at this site. Accordingly, the Agency must recommend the provision of buffer strips to protect the watercourse, together with agreed habitat improvement measures</p>	
14827105//1		<p>Comments on the Site allocations plan examination at Cox's Green</p> <ol style="list-style-type: none"> 1. Flooding - This site is unsuitable for development due to the effect it would have on the immediate surrounding area during heavy sustained rainfall. I have witnessed on several occasions Cox's Green being blocked to traffic by floodwater and the flooding of adjacent properties. The examination does acknowledge local flooding issues but surely these will be made worse by any development and the affect on drainage of surface water. 2. Highway - The local lanes to the A38 and into Wrington are narrow and there is no scope for construction of a footpath without narrowing the lanes even more. Large lorries already have difficulty entering the Burnett & Butcombe industrial sites. 3. Access to town centre services & facilities - This should be catagorised as Red. Wrington Congresbury & Yatton no longer have banking facilities. The nearest town centre would be Clevedon or Weston-Super-Mare 4. This is a rural location and would alter the character when entering the village from the A38. It would also be visable from the Mendip Hills (AONB). The development planned would be the start of a much larger application as it only takes up a part of the field adjoining Cox's Green. 	
14828033//1		<ul style="list-style-type: none"> • Site details The Site Notes state that “The proposal is reduced from 59 units”. This is misleading as the application for 59 houses, which is still current and due to be seen by an Appeal Inquiry in September, is for a much larger site, 3.68ha. The application site for the 28 houses is much smaller, 2.23ha. However, both applications require attenuation ponds; the area of which is the same in both applications, so the density of housing remains more or less the same even though the number of houses have been reduced. 	

Comment ID	Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> <li data-bbox="595 320 842 347">• Flood Risk Status All the roads surrounding the site (Havyatt Road, Cox’s Green, Nates Lane and Mill Lane) are subject to surface water flooding and impassable to cars. At times the site is essentially an island. In the most recent flooding in Wrington, on 21st November 2016, I had to abandon my car in the village as I could not reach my house via Havyatt Road, Nates Lane or Cox’s Green. I had to phone a friend to come and help me carry my 3 children through the flood waters so we could get home. Please see attached photo, Cox’s Green 211116. As an able-bodied adult, this situation would not have caused me too much anxiety but accompanied by my 3 young children, this was very frightening and stressful. Any residents on the proposed site would have been faced with exactly the same situation as me that day. They would not have been able to access their houses. For anyone with children, the elderly or less able bodied, this would have been extremely frightening and stressful, as it was for me. Surface water flooding is a real problem and a real worry to local residents. Developing this site has the potential to worsen the existing problem in this area, with Havyatt/ Cox’s Green Road being one of main access routes in/ out of the village. Additional water entering the Yeo here will also increase the risk of flooding further downstream at Butts Batch, the other access road in/out of the village on this side. <li data-bbox="595 836 757 863">• Landscape The site is outside/ adjacent to the settlement boundary. Lumping a housing development here, on the edge of the village will totally ruin the rural setting of Wrington. The edge of the village here is as you would expect the edge of a village to be – less dense housing found along the edge of the roads with housing become denser as the roads lead you further into the village. Building houses here will be completely out of keeping with the existing character, which should be protected. <li data-bbox="595 1042 898 1069">• Ecology/ Environment The Ecology Report submitted by the developer showed a high level of bat activity along the hedgerows in the site. <li data-bbox="595 1145 931 1173">• Transport and Highways There is no safe pedestrian access to the village from the site and neither of the current applications for the 28 or 59 houses have produced a viable solution to providing the necessary footway along Cox’s Green into the village. Although NSC’s Highways Department have not refused the most recent proposal for the installation of a footway along Cox’s Green outside the Burnett’s Industrial Estate, the Wrington 	

Comment ID	Organisation	Comment	Attached documents
		<p>Village Alliance Transport and Highways expert has produced a report highlighting health and safety issues along this stretch that have not been considered by NSC's Highways Team, regarding the turning circle for lorries entering/ exiting the Burnett's Industrial Estate, with HGV's needing to mount the proposed pavement. Also, the proposed footway would need to pass through residents' front gardens. Those residents would not be willing to release any of their land to the developers, so the proposed footway would not be able to be installed.</p> <p>All roads surrounding the site are narrow country lanes. They are already used by a lot of lorries, tractors and other farm vehicles. All it takes is for a tractor to meet a lorry/ bus, cars quickly back up behind both and chaos arises! Havyatt Road/ Cox's Green are also used as a "rat run" for vehicles wishing to travel from the A38 to the A370. In the winter months vehicles on Havyatt Road often need to drive on the wrong side of the road to avoid surface water which collects and remains on the roads for weeks at a time.</p> <ul style="list-style-type: none"> • Agriculture Land Value The land has been described as probable Medium BMV land. These fields are currently used by a local Wrington farmer for grazing. Surely the fact that they are currently being used for farming shows that they have an agricultural land value? These are not empty fields not in use. There are cows in the field as I write this. • Combat ability with surrounding uses A "Yes" has been given. However, the proposal site is outside the settlement boundary and is opposite the Havyatt Business Park, which includes the Butcombe Brewery, Travis Perkins and PJ Hare. The access road to the site is very close to the access road into the Business Park, which is used by lots of HGVs. Lorries often park on Havyatt Road along this stretch of road if they need to wait to enter the Business Park. Industry is typically found on the outskirts of villages so that the business of businesses does not interfere with residents. Problems arise when residential properties begin to encroach on business areas. Havyatt Business Park is a safeguarded employment site and it is NSC's duty to protect this. The Butcombe Brewery and PJ Hare have both submitted objections to the planning applications for 	

Comment ID	Organisation	Comment	Attached documents
		<p>this site, voicing their concerns over the negative impact building housing this close to the business park will have on their businesses.</p> <ul style="list-style-type: none"> • Physical factors The site is susceptible to surface water flooding. Water collects in various areas of the site, in the centre of the site and along its edges with Cox's Green and Havyatt Road. • Site Availability – Are there any known legal/ ownership constraints?The current application proposals for the necessary footway into the village along Cox's Green requires land from a number of residents' private gardens to be taken. These residents are not willing to release their land for this purpose. <p>Suitability Assessment</p> <p>2.2 Achieve reasonable access to a full range of educational facilities - Primary Education</p> <p>A Green has been awarded, stating that Wrington School has capacity. However it is generally accepted that schools should not operate at full capacity and it is NSC's policy to aim to have surplus places in the region of 5-7%. Wrington School has a total capacity of 210 children. Therefore Wrington School should have surplus places of 10-15 children per year. Therefore the spaces available should not necessarily be filled.</p> <p>Also, a developer cannot assume that spare places can be filled by children coming from a new development. Wrington is an attractive village for families or couples wishing to "settle down" and start a family. There are always more families moving into the village, who will also have a demand on the spare school places. The Council's pupil projections are calculated annually. The projection figures for reception intake have been shown to increase and become more accurate close to that actual year, as more families move into the village. For example, in the 2014 Pupil Projections it was predicted that Wrington reception class would have an intake of 24 in 2016. The 2015 Pupil Projections predicted 28. Actual intake for 2016 was 30. Therefore the figure for predicted spaces available in future years is already inaccurate and more than what it actually will be. This is reflected in the Council's most recent Pupil Projections 2016-2020 which predicted 9 spaces in 2016. 11 in 2017, 19 in 2018 and 29 in 2019. However these figures themselves are now already out of date, as in the April this year there were only 8 spare places in the school (data provided by the school on 02.04.2017)</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>We are aware of 2 families that have recently moved into Wrington over the last few months and their children have not been able to gain places at the school. One family's children are going to be at Churchill School and the other family's children will be at Burrington. This does not help new families moving into the village integrate with the rest of the village or allow them to gain a feeling of being part of the community.</p> <p>It is NSC's policy that "school places can only be deemed to be available to development residents if accessible via a safe route to school". At present there is not a safe route to school from the site. Even if it was possible to install a footway along Cox's Green, the footway disappears again further into the village and to obtain a safe walk to school children would need to walk via Rickyard Road, a walk in the region of 1300m. This is much greater than the Councils' Desirable walking distance to school of 500m and their Acceptable walking distance to school of 1000m.</p> <p>2.4 Provide opportunities for people to work locally A Green has been awarded, however to say that there is good access to a wide range of local job opportunities within Wrington is simply not true.</p> <p>Few job opportunities arise locally and those which do come up are generally low paid. As stated in NSC Assessing Sustainability and Settlement Hierarchy in rural Settlements, business start-ups are recorded as 24, which is one of the lowest recorded across the district. The 2 industrial estates have various small businesses but limited job opportunities arise. Businesses that provided employment are moving out of the village or closing down, e.g. the Doctor's surgery moved to Churchill, the bank closed, the post office closed and relocated to Amor's store with reduced staffing. The bank is still empty, the post office is being sold as a residential property, the Doctor's surgery site is now 4 houses. To imply that people moving to a new housing development in the village are going to be able to access jobs in the village is unrealistic. This needs to be changed to Amber or even a Red.</p> <p>2.5 Achieve reasonable access to town centre services and facilities</p> <p>A Green has been awarded, however Wrington's status as a Service Village is questionable. It may have had service village status when this was originally determined (Settlement Function and Hierarchy 2007) but the loss of facilities and sustainable transport since, suggests that Wrington now meets the criteria of an Infill Village.</p>	


Comment ID	Organisation	Comment	Attached documents
		<p>A Service village is supposed “to provide a service role function beyond their immediate locality and normally serve the population of one to three parishes.” However, the population of Wrington need to use the services of other Service Villages. Residents of Wrington need to use the Doctor’s Surgery in Churchill (although often to get an appointment we are often now sent to Yatton Surgery). We need to shop in Budgen’s in Churchill, Tesco Express in Congresbury or Co-op in Yatton. To use a bank we need to go to Yatton. To use a cash machine we need to go to Budgen’s in Churchill or Tesco Express in Congresbury.</p> <p>If we are a Service Village, why do we always have to travel to and use the facilities and services of other villages? To award Wrington a Green, implies that we have the same services and facilities as other villages such as Congresbury, Yatton, Long Ashton, etc and the same as if we were on the edge of one of the towns! This is simply not a true reflection of what Wrington is really like or the services it has to offer its residents.</p> <p>This should be an Amber.</p> <p>4.2 To protect and where possible enhance biodiversity and geodiversity at a landscape scale, particularly with respect to protected habitats and species</p> <p>Amber has been awarded, however the Ecology report submitted by the developer for the recent applications has highlighted a high level of bat activity along the hedges of the site. We are concerned about the impacts of lighting on the bats. This is an intrinsically dark sky that should be protected. Although the current applications propose low levels of lighting in their own lighting schemes (which may in themselves still be too high) the lighting that will emanate from the houses themselves cannot be controlled.</p> <p>This should be a red.</p> <p>4.3 Minimise impact on and where appropriate enhance valued landscapes, recognising its wider purposes (natural beauty, enjoyment and cultural heritage) whilst having regard for its economic and social well-being. Including that within or close to the Mendip Hills AONB.</p> <p>An Amber has been awarded, however the Planning and Regulatory Committee refused the application for 59 houses on the basis that the development failed to respect the character of the settlement, would be out of keeping with the rural landscape character and quality of the area and would result in harm to the rural setting and edge of the village here and</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>was therefore contrary to DM10, DM32, CS5, CS12, CS14 and CS32.</p> <p>Although the number of houses has been reduced to 28, the area in which the houses are to be built has also been significantly reduced, so the density of housing remains the same. This type of development is not suitable for the rural setting of the edge of the village. It is out of context of the existing housing here and will cause an unacceptable harm to the character of the area, which is a picturesque rural village. This should be a red.</p> <p>5.1 Achieve reasonable access to sustainable transportation - frequency of bus services A Green has been awarded, which gives the impression that Wrington has an acceptable and appropriate level of bus services. However this is not the case.</p> <p>Section 5.1 refers to Policy DM27 of Sites and Policies Development Management policies. Policy DM27 aims to ensure that “all new development is accessible by bus services and that services are provided at an appropriate level.”</p> <p>Wrington is served by one bus route only, the A2 which goes from Weston to Bristol Airport via Banwell, Winscombe, Sandford, Churchill and Wrington. These buses are available approximately hourly during the day, however only to those destinations mentioned above. Surely to achieve a reasonable access to sustainable transportation, it is not just the frequency of bus services that should be taken into account – the destinations are also surely important! Weston is the only main town that can be accessed via public transport from Wrington. Residents would not be able to get to the other towns of Nailsea, Clevedon or Portishead, or the train station at Yatton, or the majority of the other service villages. I work in Yatton and my husband works in Clevedon and neither of us can use public transport to get to work. To get to Bristol, residents would be able to change at Bristol Airport and get the Bristol Flyer. However the earliest A2 bus leaving the village arrives at the airport at 8.12am. There is then the walk to the Flyer bus stop, wait for the next bus and journey into Bristol, which is at least 30 minutes at quiet times, much longer at rush hour. So it would be not possible to get to work in Bristol for 9am. The journey is also expensive. Even with the Flyer residents discount card, a return journey from Wrington to Bristol would cost £11.50 and then there maybe be an additional bus journey depending on the place of work in Bristol itself. Therefore, it is not considered that Wrington should receive a Green, based on the fact that there is not an appropriate level of bus services from Wrington, due to the limited destinations that can actually be reached by bus.</p>	


Comment ID	Organisation	Comment	Attached documents
		<p>This should be an amber or red.</p> <p>5.2 Achieve reasonable access to sustainable transportation – Proximity to bus stops</p> <p>A green has been awarded, however the nearest bus stops would only be 400m from the northern end of the site.</p> <p>Also, DM27 states that, “The nearest appropriate bus stops should be compliant with the necessary disability legislation with raised kerbs.” The nearest bus stops on Silver Street are not disability compliant. The bus stop leading into the village is on a normal unraised pavement, which is particularly narrow. The bus stop leaving the village has no pavement at all and is on rough ground by the Recreation Ground. The closest bus stops to the site that are disability compliant are outside the Golden Lion, which is approximately 800m from the site. This distance would score a Red.</p> <p>Neither of the bus stops closest to the site have a shelter, as recommended. Also, DM27 states that pedestrian access to the bus stops should be a well-lit, safe route with clear sight lines. The pedestrian access to the bus stops on Silver Street are poorly lit and on a road, on a sharp, blind bend which does not have a foot way. As mentioned previously, installing a pavement here has not been shown to be possible.</p> <p>Therefore, this section needs to be amended to a Red.</p> <p>5.3 Achieve reasonable access to sustainable transportation - Pedestrian and cycleway links</p> <p>Amber has been awarded, however it is not considered that there is “safe and convenient connection to the surrounding area”. There are no footways on any of the roads surrounding the site or into the village. The roads are narrow and have a lot of HGVs, tractors and other farm vehicles using them. They roads are subject to surface water flooding and they are poorly lit. People walking on the roads wear hi-visibility vests even in the day and at night you need a torch to walk into the village. There are no cycleways nearby and cycling is not considered safe on these roads.</p> <p>The site should receive a Red score for this section. It has poor links to the surrounding area as it has no pavement or cycleway.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>The walk into the village is unsafe at a number of places where the footway disappears after Rickyard Road and then again on Silver Street into the village. There is a need to cross the road on Silver Street outside the Recreation Ground entrance where the pavement ends on one side of the road and starts on the other side. Crossing here is on a bend of the road, which is dangerous with children and pushchairs. More often than not I start crossing but then have to stop and back my pushchair and children onto the pavement again as a car comes round the corner. The facilities in the village itself are on roads without pavements, on a bend, with lots of parked cars at a busy road junction. The walk into the village really is treacherous in a number of locations, especially with children.</p> <p>This should be a red.</p>	
14819777//1		<p>I strongly object to the assessment of the land at Cox's Green and the number of 'Green' lights it's received in this most recent assessment when it had less before. Nothing has changed!</p> <p>This land is not suitable for development and should not be considered for inclusion in any site allocation plan.</p> <p>Surely the most obvious course of action is for the government to force the developers to develop the land they've already acquired and not scrape the barrel for any land left in North Somerset to squeeze a few houses on. What's going to be left of North Somerset whilst the developers bank their land and refuse to deliver? Please, please, please stop this madness and start preserving the countryside, or at least support the residents who are having to defend their way of life at great expense in time and stress as well as money.</p> <p>I agree with the comments submitted by the Wrington Village Alliance and the Wrington Parish Council on this matter. Wrington shouldn't even be classified as a service village let alone be suitable for development due to the serious issues the village has with flooding which as already cost NSC millions, lack of buses - see the work WVA has done on this in it's objection to the proposed development... In fact, take the whole document and copy and paste it into the comments section for the SAP - any development here is clearly against council policy.</p>	
17567681//1		<p>I live in Wrington and would like to give evidence about some areas of concern.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>The Primary School - was 'red' now 'green'. My son did not get a place at the school and had to get a minibus to Churchill Primary school. We didn't get a place as the school was oversubscribed and we live within the village, not on the edges but on Kings Road. This was 3 years ago, and we had to wait 3 years for a place to be available.</p> <p>Transport links - My husband struggles to get to work and back from Bristol since the buses were cut. There are now no direct buses to Bristol. Again this has moved from 'red' to 'green' in a period of time when the transport availability had reduced not increased.</p> <p>I have seen the Cox's Green site flooded and it is ridiculous that it is being considered for development. Many houses, particularly people particularly in The Glebe have experienced considerable flooding problems and this would make it worse.</p>	
17568929//1		<p>It has been turned down before and for good reason. Why is it even being considered now?, nothing has changed.</p> <p>Developments in and around small rural villages aren't the way forward. It makes far more sense for developers to be forced to actually build on the land they already have planning approved for rather than bolstering housing numbers with new unsustainable locations.</p> <p>I urge you to please start preserving the countryside and look at locations with better transport links, no history of flooding, etc. currently it's left to the residents to defend their way of life, this costs us time, money and is extremely stressful.</p> <p>The Wrington Village Alliance and the Wrington Parish Council have already submitted comments on this matter and I agree wholeheartedly with them.</p> <p>Wrington shouldn't even be classified as a service village let alone be suitable for development due to the serious issues the village has with flooding which as already cost NSC millions, lack of buses - please consult the documents the WVA have already put forward in it's objection to the proposed development on this site, when the development notices we're</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>first put up around the site, they stated that any development here is against council policy and clearly this is still the case.</p>	
14590529//26	Persimmon Homes Severn Valley	<p>Cox's Green, Wrington – the development industry consortium agree that this site has the potential to deliver in the five year period.</p>	
17557313//1	Redcliffe Homes (GL Hearn)	<p>The Council's objection is limited to the perceived impact of the scheme on the landscape and village character, referring particularly to the configuration of development, despite the fact that all matters are reserved for later determination, except points of access. The landscape is not subject to any national or local designation and there are no designated historic assets within close proximity of the site which would be affected by the development. The Council has acknowledged that the proposals meet the economic and social dimensions of sustainable development and Wrington is a service village which is identified through the Core Strategy as appropriate for small-scale development.</p> <p>The submitted SAP does not include any residential site allocation at Wrington.</p> <p>There are limited opportunities for residential development at Wrington due to the Green Belt which wraps around the village edge, extending to Cox's Green, immediately north of the site. Land at Cox's Green is the only site which has been promoted through the Site Allocations Plan and which is subject of live planning applications. The Council is yet to determine the planning application for the 28 dwelling scheme, there are no statutory objections to the scheme and no matters outstanding to question the principle of development.</p> <p>In reviewing the Council's assessment of Cox's Green we make the comments that for sub-objective 4.7 the Council have attributed Cox's Green a red rating, the site lies within flood zone 1 at low risk of surface water flooding and therefore it is considered that this should be a green rating. As mentioned previously there are no designated historic assets within close proximity of the site which would be affected by the development therefore it is considered that sub objective 4.3 should be a green rating. We would also question the appropriateness of some of the other ratings within the assessment as they represent the situation at the present time and do not reflect the opportunities which the site could deliver.</p> <p>Whilst we support the Council's identification of the 28 dwelling scheme within Part 2 of the CD2a, it would seem to be</p>	<p> Site Allocations Plan examination further residential site assessments.msg (563 KB)</p>

Comment ID	Organisation	Comment	Attached documents
		<p>inappropriate for the Council to reach a different stance in respect of the 59 unit scheme (currently at appeal) within the plan-making context given the assessment criteria applied. Indeed, Policy CS32 of the Core Strategy advises that schemes in excess of around 25 dwellings should first be allocated through the Local Plan. It is understood that the Council's objection to the scheme is in part due to this provision of Policy CS32 and that the scale of development (59 dwellings) would breach this 'around 25 dwellings' policy threshold. It would be entirely within the Council's gift to propose allocation of the site as a site which is consistent with the Core Strategy and capable of delivery within the 5 year period. Accordingly, the 59 unit scheme at Cox's Green, identified within CD2a, Part 1, should be included within the Council's identified supply and thereby contribute towards the additional 'up to 2,500' required to achieve a sound plan.</p>	
14822593//1		<p>The resident pair of Buzzards who nest on this site have produced young this year. Their anxious parental calls sound like a lament for the loss of these small but massively important wildlife stepping stones of land, that are being lost to development.</p> <p>Stop building on greenfield sites. Hold developers to account and insist that they build on more suitable brownfield sites. This is a greenfield site. The site is BMV agricultural land being used at present by local farmers. This site is outside the village boundary, all the roads that will service the site flood.</p> <p>Despite work carried out by North Somerset the flooding problem has not been solved.Can North Somerset Council assure nearby homeowners that filling this natural flood defence with tarmac and concrete will not result in their homes and businesses flooding? Do North Somerset recognise that they have a duty of care to existing residents? Wrington is recognised as being extremely vulnerable to flooding.</p> <p>Sub objective 4.7(SAP Further Assessment of Residential Sites) states that the site has a high risk of flooding. This should be enough to reject this site.</p> <p>There is no safe pedestrian walkway into the village, or a safe route to build one.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>The overall effect of rampant development on North Somerset resources is not being assessed effectively. The infrastructure simply cannot cope, be it health,transport,education etc. North Somerset villages cannot continue to be a cash cow for developers building houses for aspirational need.</p> <p>The process for local people and their elected officers to object to inappropriate development is heavily weighted in favour of the developers. They are not required to consult with local people and can force expensive and time consuming appeals. When our elected councillors reject unsuitable planning applications.</p> <p>The appeal for an application on this site, lodged before a decision was made, will run for 6 days. This is a massive drain on local resources and almost impossible for ordinary residents to respond and match the resources that are needed to effectively defend their position.</p> <p>It seems that on so many counts this site contravenes the guidelines set out in NPPF.</p>	
1019201//1	Wrighton Parish Council	<p>we have considered the statements made by NSC in its site assessment and offer the following comments on the land at Cox's Green and its suitability:</p> <p>1. Site Details</p> <p>The industrial site to the west could not be described as 'relatively hidden'. The 'residential row' referred to comprises only four (4) small houses, two of these semi-detached and one a bungalow, and the industrial site buildings are clearly visible from the substantial majority of the proposed development site. The site access on to Havyatt Road will be almost opposite the entrance to the industrial site. The proposal to re-site some of the hedges would make the industrial site even more visible, especially from first floor windows of any new houses. Note that the site is adjacent to the Green Belt, as well as the settlement boundary, and development here would inevitably have some impact upon the openness of the Green Belt.</p> <p>2. Site Suitability</p>	<p> WPC comment on NSC assessment of residential sites - Cox's Green, August 2017.pdf (309 KB)</p>

Comment ID	Organisation	Comment	Attached documents
		<p>Flood Risk Status In order to reflect the true circumstances, the following should be added to the first sentence; <i>‘with the surrounding lanes obstructed by water in flood conditions.’</i> Photographic evidence is already with NSC which demonstrates this flooding.</p> <p>Archaeology Any archaeological potential should be investigated and the reports published.</p> <p>Landscape If built the site would be highly visible from the AONB and would impact on the green, un-developed, Wrington Vale landscape. It is suggested that the land has more than ‘moderate character’ and is arguably an essential element in the currently undeveloped landscape running alongside the river Yeo between Congresbury and Blagdon Lake (SSSI).</p> <p>Ecology/Environmental There is recorded evidence that the undeveloped grassland and hedgerows on the site are used by bats for foraging and flight routes. Removing or re-siting the hedges and any further street lighting will be detrimental to these protected bats. It is suggested this section is re-worded as follows;</p> <p>‘The Congresbury Yeo (SNCI/Wildlife Site) flows to the south of the site and a smaller watercourse flows through the site. There are hedgerows through and around the perimeter of the site and along the proposed site for a footway, all having ecological value, some of these proposed for removal or relocation. The grazing land provides a valuable foraging and flight route link for bats, in comparison with the increasingly more arable use of land to the east.’</p> <p>Transport and highways It is suggested this is re-worded as follows:</p> <p><i>‘Local highways concerns have been raised about the narrow country roads, which have very limited space available for the commercial vehicle traffic associated with the industrial estates and no provision for pedestrians. A satisfactory solution would be required at the planning application stage.’</i></p> <p>Site Access Does ‘Yes’ mean there is access or that access will be satisfactory? Access is currently via a farm gate on a narrow country lane close to the brow of a hill and a blind bend. Please re-consider this statement.</p> <p>Site/area character The site is remote from the village centre, but is outside the settlement boundary and adjacent to the Green Belt boundary, with agricultural land adjacent to the east and south of the site. It follows that the proposed</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>development cannot be described as compatible with surrounding uses, and development of the site must have some impact on the openness of the Green Belt.</p> <p>Topography There is a ridge running through the site in an east/west direction which will result in any development being highly visible from all directions. The presence of this ridge, the resulting part surface water drainage to the north, and the acknowledged high water table, would consequently result in a poorly drained and damp site. Run-off from the site already contributes to flooding on Cox’s Green and Havyatt Road. NSC has been provided with photographs which illustrate this flooding.</p> <p>Planning Policy Whilst this Council is pleased to note that the <i>‘site is not currently or proposed to be allocated’</i>, we would question whether the designation of a service village can now reasonably be allocated to Wrington as many of the facilities and RAG designations referred to in this Assessment do not appear to stand up to challenge (See further comments below). We would also argue that the proposed development does not respect the character of the village and exceeds the limit of 25 houses set out in NSC’s Core Strategy CS32 para 4.85.</p> <p>3 Summary of Site Suitability</p> <p>3.1 Site Availability</p> <p>We understand the site to be owned by an individual, although a developer is promoting development of the site. Proposals by the developer to install footpaths along Cox’s Green northwards are confounded by claims that the land up to the highway edge is in the ownership of residents. Therefore, safe pedestrian access to and from the site is not achievable without compliance from these residents.</p> <p>3.2 Site achievability</p> <ul style="list-style-type: none"> o Viability constraints There exist constraints as to access, sustainability and flooding (see elsewhere in these comments). o Competing sites It must not be overlooked that the same developer has an outline planning application for 59 houses on this site, currently the subject of appeal (16/P/1291/O). 	


Comment ID	Organisation	Comment	Attached documents
		<p>o Status of development interest We would question the ownership of this land which we understand may be owned by an individual, with others also having an interest, but not Redcliffe Homes at this time.</p> <p>4. Key actions to explore to overcome constraints</p> <p>4.1 Flood risk</p> <p>This Council respectfully suggests that the NSC Flood Risk team might not have understood fully the nature and causes of flooding in this area of the village and have not taken into account the topography of the site, through which runs a ridge of land. This ridge must result in surface water draining to the north and to Cox's Green, whereas to the south of the ridge it drains towards the river Yeo. The river itself floods surrounding land at times of heavy rain, there is regular flooding in Cox's Green and the Burnett Industrial Estate has suffered flooding in the past. NSC is already in possession of photographic evidence of flooding events relating to the site and without major offsite works no amount of planning conditioning would satisfactorily mitigate the flood risk associated with the inadequate surface water drainage (which will be exacerbated by the development of the site), as well as the foul water and sewage removal. Substantial capital investment would appear to be necessary in order to provide increased surface water drainage capacity from Cox's Green towards the west.</p> <p>4.2 Local highway concerns</p> <p>It is doubtful whether safe pedestrian access to the village could be achieved as all the land which would need to be utilised, or at least as shown on the drawing submitted by the developer, is not available. It is argued that this in the ownership of private householders and is not Highway land, with this including substantial hedges which would also need to be removed. If a footway cannot be provided then the site remains unsustainable in planning terms as a safe pedestrian access to the centre of Wrington cannot be ensured. Also, any increase in traffic flows will add to the congestion and other difficulties already experienced in the centre of the village.</p> <p>5. Sustainability Assessment</p> <p>i. SA Objective 1: Improve Health and wellbeing</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Sub-Objective 1.1 Rated Red - Accepted</p> <p>Sub-Objective 1.2 Rated Amber - Recommended Red</p> <p>The football pitch on the recreation field is currently only available for use by the Wrington Redhill Football Club, not for wider community use. An assessment of Red is therefore appropriate, not Amber. 5</p> <p>Sub-Objective 1.3 Rated Red - Accepted</p> <p>Sub-Objective 1.4 Rated Amber - Recommended Red</p> <p>This designation should now be Red. The now minimal provision of medical facilities within the village is to be withdrawn, ref Mendip Vale Medical Practice request to NHS England. Using road transport (car is the only reasonable way to reach it as there is no direct bus service), the distance from the site to the medical facilities at Pudding Pie Lane, Langford is in excess of 5km and this rating must therefore be Red.</p> <p>ii. SA Objective 2: Support communities that meet people’s needs</p> <p>Sub-Objective 2.1 Rated Amber - Recommended Red</p> <p>Bearing in mind the acknowledged lack of safe pedestrian access to the village centre from the site, it would seem more appropriate to designate this sub-objective as Red. (Note also the comments under ‘Site Suitability’ above.)</p> <p>Sub-Objective 2.2 Rated Green - Recommended Amber</p> <p>The village primary school has a limited capacity and any expansion would be both costly and disruptive in terms of increased staffing requirements and increased classroom facilities. Some classes are already accommodated in ‘portakabin’ type buildings. No forecast of potential need has been provided, nor can there be any guarantee of funding for more staff or buildings, hence this assessment can’t reasonably be considered Green. This should therefore be rated as Amber.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Sub-Objective 2.3 Rated Red - Accepted</p> <p>Sub-Objective 2.4 Rated Green - Recommended Amber</p> <p>There is definitely not access to 'a wide range of local job opportunities' within the local settlement. Job opportunities within Wrington are very limited with most businesses employing a relatively small number of staff, many of whom commute into Wrington to work. We are not aware of any job vacancies currently advertised within the settlement. In this Council's view, this should be rated as a minimum of Amber.</p> <p>Sub-Objective 2.5 Rated Green - Recommended Amber/Red</p> <p>This Council maintains that it is arguable as to whether Wrington should now be classified as a service village in view of the progressive reduction in the facilities available and services provided. There are grounds for re-visiting this designation which would justify this assessment as Amber or even Red. 6</p> <p>iii. SA objective 4: Maintain and improve environmental quality and assets</p> <p>Sub-Objective 4.1 Rated Green - Accepted</p> <p>Sub-Objective 4.2 Rated Amber - Recommended Red</p> <p>There are acknowledged risks to the river Yeo, a designated SSSI Site, as NSC suggests drainage for the site would be diverted to the river Yeo. However, the site cannot all flow to the Yeo for reasons explained elsewhere. There will also be impacts upon bat habitat, also acknowledged by the developer. The title of this sub-objective is to 'protect and where possible enhance bio-diversity... particularly with respect to protected habitats and species'. This proposed development obviously fails to enhance anything. It should therefore be rated as Red.</p> <p>Sub-Objective 4.3 Rated Amber - Recommended Red</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>The site will of course be highly visible from the Mendip Hills AONB, particularly as its straddles an elevated ridge running through the site, and the development would also have a visual impact on the Green Belt and the existing properties on Cox's Green and Havyatt Road. There is a justifiable argument that this rating should therefore be Red.</p> <p>Sub-Objective 4.4 Rated Red - Accepted</p> <p>Sub-Objective 4.5 Rated Amber - Accepted (see comment)</p> <p>Without formal classification as BMV land, this designation is not substantiated. We would urge an assessment be undertaken to clarify this, since to build on BMV land would not be acceptable unless very pressing needs were demonstrated, but which to date have not been put forward. In the meantime, an Amber rating is accepted.</p> <p>Sub-Objective 4.6 Rated Green - Recommended Red</p> <p>Although the site is technically outside Flood Zones 2 and 3, there exist persistent flooding issues which have been the subject of correspondence between this Council and NSC. It appears to the Council that there is a fundamental misunderstanding of the causes for the flooding but it is clear that any development on the site would only serve to exacerbate the flooding issues already in place. Conditioning any development is not the solution to this problem and a full and comprehensive investigation is required to reach a sound and complete understanding of the causes of this flooding. In the circumstances, it is not justifiable to attribute a rating of Green to this objective, particularly when Sub-Objective 4.7 is rated as Red. It is noted also that there is no assessment of potential downstream impacts as there are obvious physical constraints at both Tumbling Weir and Beam Bridge where flooding has been experienced in the past and the fields from Beam Bridge 7 towards Congresbury and Iwood, which are also flooded in times of heavy rainfall. Any further run-off from the site must aggravate flooding potential downstream.</p> <p>Sub-Objective 4.7 Rated Red - Accepted</p> <p>Sub-Objective 4.8 Rated Green - Recommended Amber</p> <p>Local residents frequently experience congestion and delays along Havyatt Road and Cox's Green due to vehicles accessing the industrial estates as well as incoming and outgoing commuters using this lane to reach the A38. Nates Lane</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>is very narrow and unsuitable for this purpose. It is inevitable that cars will be the preferred means of accessing the site. The bus service is generally unsuitable to meet commuters' needs and cycling is not to be recommended along the narrow access lanes in and out of the village. It follows therefore that any development on this site would add to highways issues already exacerbated by recent developments within the village, notably shop and office conversions to residential use. This objective should be rated as Amber.</p> <p>iv. Objective 5: Minimise consumption of natural resources</p> <p>Sub-Objective 5.1 Rated Green - Recommended Amber/Red</p> <p>Bus services in Wrington do not connect with any of the neighbouring settlements of Clevedon, Nailsea and Portishead and certainly not within a 30 minute timescale. Travelling time to Weston-super-Mare by car normally takes in excess of 30 minutes and by bus up to 45 minutes. There is no bus service to Congresbury or Yatton. The only bus service through Wrington is the A2 service which has a limited timetable with no buses on Sundays or Bank Holidays and with the overall frequency inadequate. Crucially, funding for the A2 has recently been withdrawn by First as the service is not considered to be viable. The existing service cannot be regarded as running consistently on an hourly basis and the rating for this objective should therefore be a minimum of Amber and arguably Red.</p> <p>Sub-Objective 5.2 Rated Green - Recommended Amber</p> <p>Although a bus stop may be close to the site, please note the comments set out above under Sub-Objective 5.1.</p> <p>Sub-Objective 5.3 Rated Amber - Recommend Red</p> <p>There are currently no footways enabling safe access to the village centre from the site, and although the developer has proposed a scheme to achieve this, the viability of that scheme/proposal is very much in doubt (see comments under 'Site Availability' above.). It is not easy to understand how cycle links could be improved either, with the narrow access lanes to Wrington being one constraining factor. An appropriate classification for this sub-objective must therefore be Red.</p> <p>Sub-Objective 5.4 Rated Red - Accepted</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Sub-Objective 5.5 Rated Amber - Accepted</p> <p>(as a reflection of the Core Strategy and Planning Policy)</p> <p>.....</p>	
14836321//1	Wrington Village Alliance	<p>With reference to the above consultation, the following sets out the response from Wrington Village Alliance (WVA) which we believe supports North Somerset’s view that the site is not acceptable for development. In addition we feel the sustainability assessment, when including the comments from WVA, further challenges whether Wrington should even be classified as a Service Village due to the continual erosion, over time, of many of the facilities which characterise this status and to the extent where the status of infill village would now be a more appropriate classification.</p> <p>Although this response addresses the suitability and sustainability criteria set out in your consultation, as the land is already the subject of a live planning application, some detail as to why, in our view, the application is flawed and is contrary to existing planning advice is also included in our response.</p> <p>Site Details</p> <p>Surrounding areas.</p> <p>The industrial site to the west is not relatively hidden from the proposed site as the site entrances to Havyatt Business Park and the proposed 28 houses are in close proximity. The size of vehicle using the Business Park and the need to have these waiting outside in Havyatt Road during peak delivery times will mean the industrial area is very present. The proposed access road and housing are also likely to be in conflict with the ‘safeguarded employment area’ in the area</p>	 Site Allocations Review - WVA Objection.pdf (3.3 MB)

Comment ID	Organisation	Comment	Attached documents
		<p>around their respective site access and this is highlighted by objections to the housing proposal by businesses within the industrial park.</p> <p>The term ‘relatively hidden’ also refers to the time of year when the hedgerows are in full leaf. At other times, late autumn to early spring the deciduous hedgerows do not provide a visual screen and the industrial park will be clearly visible from both ground and first floor windows.</p> <p>Site Suitability</p> <p>Flood Risk Status</p> <p>The surrounding roads to the site are prone to flooding making it impossible to get to or from the village. There is numerous photographic evidence of this. The site has a ridge running east to west and where rain is presently absorbed into the agricultural land, this will run off onto Cox’s Green once site is hardscaped making surrounding roads, residential and business properties more vulnerable to flooding.</p> <p>Archaeology</p> <p>- A geophysical survey of the site has been carried out and archaeological potential should be investigated.</p> <p>Landscape</p> <p>- The development site adjoins the North Somerset Green Belt and is some 2.5 km north of the Mendip Hills AONB. The Landscape and Visual Impact Assessment (LVIA) produced by the planning applicants states that “the site lies almost in the centre of the Rolling Valley Farmland LCT (Landscape Character Type) and associated Landscape Character Area (LCA) J2: River Yeo Rolling Valley Farmland.” The Adopted Version of the North Somerset Landscape Character Assessment (NSLCA) states that the landscape strategy for LCA J2 is “to conserve the peaceful, rural nature of the landscape with intact pasture and field boundaries and to strengthen the area of weaker character particularly where the landscape is affected by modern infill and ribbon development along roads.” (emphasis in original) The proposed development is in clear conflict with this policy and its objectives. If permitted it will result in the urbanisation of an area of open greenfield, outside the established settlement boundary, will result in the loss of field boundaries (hedgerows),</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>and will result in harm to the setting and edge of the village. In addition, it will constitute a form of ribbon development along</p> <p>Havyat Road and Cox’s Green. The development site is clearly visible from these roads, and a number of other Public Rights of Way (PROW). Furthermore, the site is visible from a number of viewpoints within the Mendip Hills AONB, for example Beacon Batch and Burrington Ham, thus adversely impacting on the AONB itself.</p> <p>Ecology/Environmental</p> <p>- CS4 requires that new development is designed to maximise benefits to biodiversity, seeking to avoid net losses to such. The explanatory text identifies a number of internationally Important European Sites, such as Special Areas of Conservation (SACs), making specific reference to the North Somerset and Mendip Bats SAC which supports rare greater and lesser horseshoe bats (CS para 3.57).</p> <p>Legislation requires a Habitats Regulation Assessment (HRA) to be undertaken if it is considered that a proposal, standing alone or in combination is likely to have a significant effect on an SAC (CS para 3.58) Confusingly, the Ecological Assessment submitted in support of the original planning application recognises that there is an SAC for bats in the proximity of the site, but appears to be uncertain as to the actual distance involved. At page 12 of the assessment the North Somerset and Mendip SAC is described as “just over 2 km” from the site, whereas at page 14 “An SAC for bats is located within 1km of the site.” 12 species of bat are recorded within 1 km of the site, and 130 records of otter, another European Protected Species (EPS), have been recorded. In terms of lighting, overall light levels for the site were recorded as lux zero, “creating excellent conditions for bats (para 6.2.6.6) The most important hedgerow on the site for commuting and foraging bats is identified as hedgerow , along the southern boundary, which it is stated will be preserved and protected from the effects of housing by a 10m buffer zone (para 7.1.1) Hedgerow 4 is described as being “an important corridor for commuting bats”, including lesser and greater horseshoe bats (para 7.2.6)</p> <p>The assessment recognises that lighting can have a highly disruptive effect on bat activity, both foraging and commuting, stating that “It will be important to ensure that light levels along all boundaries (most importantly the southern boundary) are not raised significantly.” (para 9.2.2.1), but concludes that as a lighting plan has been devised to ensure that levels will be kept to a maximum of lux 1.0, the proposed development is unlikely to have a significant effect on the North Somerset</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>and Mendip Bats SAC. (para 8.2.1). There are a number of problems arising from this approach to mitigation. Firstly, there is no evidence that a 10m wildlife buffer is effective at not disrupting bat commuting and foraging. Secondly, whilst street lighting levels and spill may be controlled by way of planning conditions, domestic lighting cannot be similarly controlled. No planning conditions can be applied or enforced to control security lighting, patio lighting or spillage from domestic lighting in properties. Consequently, no reliance may be placed on the effectiveness of the proposed mitigation, and absent an HRA, it cannot reasonably be concluded that there will be no significant effect on the SAC.</p> <p>In addition the assessment wholly fails to consider other developments, proposed or in the process of being built out, which could cumulatively impact on the SAC, and other potential impacts of domestic buildings on bats, such as cat predation remain unconsidered. Given that SACs are protected at the highest level, and the case law (ECJ Waddenzee C - 127/02) requires there to be no scientific doubt that there will be no significant likely effects on the integrity of an SAC, such a test is not met in this instance. Furthermore, the 2010 Conservation of Habitats and Species Regulations require licences to be granted by Natural England (NE) where any activity is deemed likely to disturb bats, all species of which fall under the Regulations. Pursuant to Reg.53, 3 tests must be satisfied, the imperative reason of overriding public interest (IROPI) test, the “no satisfactory alternative” test and the test that the action proposed will not be detrimental to the maintenance of the population concerned at a favourable conservation status. In the context of this application, it is difficult to see how the provision of up to 28 dwellings is capable of satisfying the “imperative reason of overriding public importance” test, and it is clear from the fact that the site is unallocated for housing purposes in the Development Plan, and is not being promoted in the emerging Site Allocations Plan (SAP) that there are satisfactory alternatives within the District for the provision of up to 28 dwellings. It further appears that no up to date bat surveys have been undertaken, the latest being for the 2015 season. The failure to provide an up to date survey is contrary to advice provided by the statutory advisor on such matters, Natural England, and is also contrary to the best practices of ecological consultancies.</p> <p>Transport and highways</p> <p>The explanatory text to CS10 requires planning applications to address how they will deliver a choice of transport modes which could provide realistic alternatives to the car (CS para 3.151). In addition, “Larger developments (of which this is one) in particular must be within safe and direct walking distance of shops and other key services” (CS para 3.152). The NPPF (para 32) requires all development generating significant amounts of movement be supported by a Transport Assessment (TA) or Transport Statement (TS). A TA has been submitted in support of this application.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>The 2011 Census provides the following travel to work data for the Wrington ward:</p> <p>80% travel to work by private car</p> <p>4% travel as car/van passengers</p> <p>11% travel to work on foot</p> <p>2% travel to work by bus</p> <p>3% travel to work by cycle</p> <p>In other words, 84% of the Wrington Ward travel to work by private car, which speaks volumes for the sustainability of the site in terms of accessibility for employment. These figures are borne out by a survey undertaken by WVA of employers on the Havyatt Business Park and the Burnett Industrial Estate. By way of illustration, Warm Glass UK employs 22 staff, 19 of whom drive to work and Polydeck employ 15 staff, 13 of whom drive to work.</p> <p>No analysis has been provided by the Applicant of likely travel to work figures, distances involved nor likely sources of employment for residents of the new development. Although the Burnett Industrial Estate and Havyatt Business Park adjoin the development site, no information is provided in respect of projected vacancies, likely expansion of the employment sites or other employment centres in the area, and it cannot be simply presumed that the adjoining employment sites will provide employment opportunities for residents.</p> <p>No data is provided for modes of travel to access services or amenities, such as schools and shops, which constitutes a significant shortcoming in the evidence available in order to be able to assess the sustainability of the site in locational terms. Journeys for retail and leisure purposes invariably exhibit a tendency for greater reliance on the private car, and it is likely that were an analysis of such to be undertaken a figure in the region of 85% journeys by private car would be achieved.</p> <p>Despite the applicant's assertions to the contrary, it is clear that Wrington has the benefit of a very limited range of local amenities. A village shop/post office, 2 public houses, a primary school, church and village hall. The nearest supermarket</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>is over 12 km from the site, at Clevedon, whereas most forms of recreation and leisure will involve a journey to Clevedon or Weston which are over 10km away. These are only accessible by public transport with some difficulty, and the likelihood is that journeys to such will be made by private car.</p> <p>The TA forecasts no modal shifts in transport, but simply utilises the current Census data to project trip generation to and from the site. There is no Travel Plan (TP) available to suggest how the use of sustainable modes of travel would be encouraged, simply stating that "...there is considerable potential for trips to and from the site to be undertaken by non-car modes of travel rather than the private car"</p> <p>By way of illustration of the shortcomings of the sustainability case made by the applicants, there is no attempt made to calculate or project what percentages of residents of the new development would be likely to use the railway for travelling to work, what percentage would use public transport, cycle or walk. It is simply asserted that the site is accessible by footways, cycles, rail and buses. No detailed analysis is provided of the nature of trips, nor for what purpose (work, retail, leisure) nor distances involved. An Appendix has been produced by WVA as part of their objection to the current planning application on this site, which illustrates in detail the distances from the site to a wide range of key, essential services and facilities, and the travel times by sustainable modes. It becomes immediately apparent how poor the sustainability credentials of this site are in terms of location.</p> <p>The analysis of accessibility of the site produced by the Applicants is based on the Institute of Highways and Transportation (IHT) "Guidelines for Providing Journeys on Foot" (2000). The Guidelines are based on walking isochrones of 200m, 400m and 800m, each of which are described as "desirable", "acceptable" and "maximum" respectively. These categories are not defined in the Guidelines. The IHT uses average walk and cycle speeds to calculate travel times from the site in question to particular services and facilities. The TA sets these out in Table 3.1 on page 7 of the TA, concluding that as all the main facilities of the village are to be found within 1km of the site, or a 12 minute walk the site is a sustainable location for residential development.</p> <p>The IHT Guidelines are at best a crude analytical tool, which wholly fail to factor in local conditions such as topography, the provision of footways, street lighting, pedestrian crossings and other factors that may impact on walking and cycling. In addition, no account is taken of the demography of an area or the age and health of walkers and cyclists. Whereas a 1km walk to the Primary School for a healthy, fit adult in good weather may be accomplished in 13 minutes, a child of</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Primary School age will take substantially longer, and during winter months will be unlikely to make the journey on foot at all. The same applies for travel on foot to other local services and facilities, and transport nodes such as bus stops.</p> <p>The standard approach to measuring accessibility outside towns is to use data on shops and services to produce different gradations of access by public transport, often defined as access to the nearest significant employment and shopping services. No such evidence has been provided by the applicants. There is now standard software available to local authorities (Accession), which uses the Department for Transport public transport database (NAPTAN). The principle is to reflect what really matters to the user in terms of sustainable transport, walk plus wait times and the availability of service when needed (e.g. for work or evening use). By way of illustration, Transport for Greater Manchester uses the Greater Manchester Accessibility Levels (GMAL), which is included in “Transport for Sustainable Communities: a guide for Developers” dated March 2013. It states at page 13; “As a rule of thumb, 400 metres (about 5 minutes’ walk) is often taken as the distance people are prepared to walk to a bus stop. In general, people are prepared to walk further to rail or Metrolink services: up to 800 metres or more. In terms of assessing the accessibility of a new development, however, distance criteria are an oversimplification because they take no account of factors such as where services go to, how frequent or reliable they are or whether they are likely to endure in the future.”</p> <p>The sustainability credentials asserted for Wrington are under future threat, local bus services have been reduced, and there is every likelihood that further cuts will be made in the future. When set in this overall context, the conclusion in the Planning Statement and supporting documents that the proposed development site lies in a “sustainable location” is unsupported by any reliable evidence</p> <p>Site Access</p> <p>We are unsure what ‘yes’ means as there is no site access other than the gate allowing access/egress of farm animals or machinery. This access is at a point of Cox’s Green which is narrow, on a bend and at the brow of a hill.</p> <p>Agricultural land value</p> <p>This is unknown and possibility of BMV should be established.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Site/area character</p> <p>Policy CS12 states that: “Proposals of all scales will be required to demonstrate sensitivity to the existing local character already established in an area and should take the opportunity to enhance the sense of place and local identity through a well thought out design.” The explanatory text at para 3.173 expands on this aspect of the policy, suggesting that local character may be established through existing building layouts, urban grain, materials and predominant styles, and that the protection and enhancement of these features are essential ingredients to support a social identity of an area.</p> <p>Whilst it is appreciated that detailed design and external appearance will be left for a reserved matters application, it is clear that the proposed layout of a series of cul-de-sacs of the scale proposed is wholly out of keeping with the character of the village, and the type of housing immediately adjoining the site, being more appropriate to a suburban setting. The Public Open Space (POS) provided on site, will, in reality, be the exclusive preserve of residents of the new development, given that the site is far removed from the centre of the village and the limitations of public access points, and cannot be regarded as a public or community benefit. The development, if built, will be a dominant feature when entering and exiting the village. It constitutes sprawl and is out of keeping with NSC’s policy of preserving the unique character of its rural villages.</p> <p>Physical Factors</p> <p>Topography The site is on a ridge meaning housing will be clearly visible from the road and surrounding houses especially during periods when the hedging offers no visual barrier (late autumn to spring). The translocation of hedging and proposed splay lines will also draw attention to the site from drivers and pedestrians and will be out of keeping with a traditional boundary of a village which instead of having sparse housing will instead have a suburban type housing estate in a rural setting. The presence of a ridge and the hardscaping of the surface will also cause more run off of water to surrounding roads and properties with the increased likelihood of flooding in an area which is already prone to such events.</p> <p>Planning Policy Irrespective of numbers and being adjacent to the settlement boundary, the site can only be compatible with the core strategy if it is sustainable development which it is not due to distance from facilities and schools, not on a cycle network and the lack of pedestrian footway into the village. The transport of choice from this location will be car</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>which will add to congestion within the village centre and school area with the added likelihood that instead of local shops benefitting, residents will go to Budgens (Langford) or Tesco Express (Congresbury) as this will be quicker and parking is easier. Further deviation from planning policy is highlighted in the individual sections above.</p> <p>Summary of Site Suitability</p> <p>Site availability The site may be available but the requirement for a footpath along Cox's Green northward from the site is confounded by land ownership issues. The resulting restriction of highway width is also detrimental to the safeguarded employment site of Burnett Industrial Estate whose entrance is opposite this proposed footway. Businesses here will be affected due to the constraints this footway and restricted highway width will impose on large goods vehicles (including articulated) who will find it difficult/impossible to negotiate the turn into and out of the industrial estate onto Cox's Green. As a safeguarded employment site, promoted by North Somerset Council, this is causing a huge concern with businesses and the landowner with the resultant potential for conflict and consequential loss of business (letters attached). We do not consider this conflict has been fully evaluated by NSC and urge them to engage with businesses to fully understand the depth of their concern and ensure that this site remains a safeguarded employment site.</p> <p>Site achievability</p> <p>Viability constraints This should include flooding, sustainability, highway concerns, distance to amenities and school, highway issues, conflict with safeguarded employment site all of which are addressed in existing North Somerset and national planning guidance and is further detailed in this response.</p> <p>Status of development interest We believe this is still owned by Mr Islwyn Thomas and agricultural Wrington farmer for grazing is ongoing.</p> <p>Key actions to explore to overcome constraints</p> <p>Flood Risk We do not consider flood risk has been fully considered and would request that the paper produced by Mr Shail Patel as part of the Charlie Hopkins objection (on behalf of WVA) to the 28 houses planning application is referred to along with this response In North Somerset's 'Reviewing the sustainability and settlements in North Somerset' (July</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>2016), Wrington is considered to be in the most vulnerable category for flooding and as local people we are aware and have submitted photographic evidence of flooding events which have cut off this site from the village and other access roads. We also respectfully suggest that previous developments, such as Garstons, have not had adequate assessment of flooding potential as some houses have unfortunately suffered from flood damage in the recent past and although flood officers, for the Cox's Green site, have deemed mitigation through SUDS as being sufficient, we strongly believe that hardscaping of this area will cause increased flooding issues to surrounding residents and businesses thereby exacerbating an already bad situation. Please note response from Burnett Industrial Estate below, who are likely to be impacted by increased flooding risk, and their concerns including the existing need to use a sump pump to remove excess water. Again we refer to the risk of conflict between an existing and promoted safeguarded employment site and potential housing area.</p> <p>Local highway concerns the proposed footway north of the site is confounded by ownership issues. At other areas going into the village there is no footway which is dangerous for pedestrians. This makes the site unsustainable. The local highways are considered dangerous for cycling and this highlighted in North Somerset's 'Reviewing the sustainability and settlements in North Somerset' (July 2016). This is in conflict with the planning application from GL Hearn who contend Havyatt Road/Cox's Green is on the national cycle network, which is not correct. Any development here will increase vehicular traffic only leading to further congestion on the village or, the more likely scenario of, residents choosing to drive outside of the village to purchase goods.</p> <p>We are concerned that local highway issues have not been fully acknowledged and urge NSC to consider the report from Tony Harden, a highways expert, who has considered these matters in greater detail and is included within the Charlie Hopkins objection to the 28 houses planning application (on behalf of WVA).</p> <p>SA OBJECTIVE 1 : Improve Health and well-being</p> <p>Sub-Objective 1.2 Achieve reasonable access to playing pitches</p> <p>There is no football pitch available for public use within the settlement as the one referred to in the recreation ground is for the sole use of the resident football team (Wrington Redhill F.C.). The assessment should therefore be reclassified as Red as it fails to meet either standard.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Sub-Objective 1.4 Achieve reasonable access to healthcare facilities</p> <p>Depending on where you are located within the village will determine whether you are under or over 5km to the nearest medical facility in Pudding Pie Lane, Langford. The journey is primarily by car as by bus would entail a long walk from the bus stop. This also further illustrates that Wrington should not be classified as a service village when there is no medical facility (a most essential service) within the village. Wrington is also the only service village in North Somerset without a medical facility. The assessment should therefore show this as Red</p> <p>SA OBJECTIVE 2 : Support Communities that meet people’s needs</p> <p>Sub-Objective 2.1 Achieve reasonable access to a full range of community facilities</p> <p>The distance from the site to convenience store of Buglers or Amors is at least 960 metres and will be along a route which does not have safe pedestrian access. This distance is in excess of the In North Somerset’s ‘Reviewing the sustainability and settlements in North Somerset’ (July 2016) standard and is likely to result in residents driving to convenience store or, more likely, drive to Budgens in Langford or Tesco Express in Congresbury as parking is easier and there is a greater variety of goods to purchase. This illustrates that this site will have limited if any value to supporting local services and again demonstrates that residents in the outlying areas of a village will look outside of the village to meet their needs due to distance and safety concerns. The assessment should therefore show this as Red.</p> <p>Sub-Objective 2.2 Achieve reasonable access to a full range of educational facilities – primary education</p> <p>A Green has been awarded, stating that Wrington School has capacity. However, it is generally accepted that schools should not operate at full capacity and it is NSC's policy to aim to have surplus places in the region of 5-7%. Wrington School has a total capacity of 210 children. Therefore, Wrington School should have surplus spare places of 10 – 15 children per year. Therefore the spaces available should not necessarily be filled. Also, a developer cannot assume that spare places can be filled by children coming from a new development. Wrington is an attractive village for families or couples wishing to “settle down” and start a family. There are always new families moving into the village, who will also have a demand on the spare school places. The Council's pupil projections are recalculated annually. The projected figures for reception intake have been shown to increase and become more accurate closer to that actual year, as more</p>	


Comment ID	Organisation	Comment	Attached documents
		<p>families move into the village. For example, in the 2014 Pupil Projections it was predicted that Wrington reception class would have an intake of 24 in 2016. The 2015 Pupil Projections predicted 28. Actual intake for 2016 was 30. Therefore the figure for predicted spaces available in future years is already inaccurate and more than what it actually will be. This is reflected in the Council’s most recent Pupil Projections 2016 – 2020 which predicted 9 spaces in 2016, 11 in 2017, 19 in 2018 and 29 in 2019. However, these figures themselves are now already out of date, as in April this year there was only 8 spare places in the school (data provided by the school on 02.04.2017). We are aware of 2 families that have recently moved into Wrington over the last few months and their children have not been able to gain places at the School. One family’s children are going to be at Churchill School and the other family’s children will be at Burrington. This does not help new families moving into the village integrate with the rest of village or allow them gain a feeling of being part of the community.</p> <p>It is NSC's policy that “school places can only be deemed to be 'available' to development residents if accessible via a safe route to school.” At present there is not a safe route to school from the site. Even if it was possible to install a footway along Cox’s Green, the footway disappears again further into the village and to obtain a safe walk to school children would need to walk via Rickyard Road, a walk in the region of 1300m. This is much greater than both NSC's Desirable walking distance to school of 500m and their Acceptable walking distance to school of 1000m. It is also known that families is this development would not have gained reception school entry for their children in two of the last four years as it was outside of the intake area. This section should be changed to (as a minimum) Amber.</p> <p>Sub-Objective 2.4 Provide opportunities for people to work locally</p> <p>Our local surveys and knowledge show that there are limited job opportunities within Wrington with the majority of working people commuting into the village to work. It is argued that local house prices are at odds with the local working salaries available making a sustainable local working community unachievable. Local job opportunities such as the bank, post office, Doctors surgery are no longer available and new business start-ups within Wrington are one of the lowest within North Somerset. The rating of Green is wholly unrealistic and unfounded. This should be reclassified as Red.</p> <p>Sub-Objective 2.5 Achieve reasonable access to town centre services and facilities</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Wrington's status as a Service Village is questionable. It may have had service village status when this was originally determined (Settlement Function and Hierarchy 2007) but the loss of facilities and sustainable transport since, suggests that Wrington now meets the criteria of an Infill Village. A Service village is supposed "to provide a service role function beyond their immediate locality and normally serve the populatojn of one to three parishes." However, the population of Wrington need to use the services of other Service Villages. Residents of Wrington need to use the Doctor's Surgery in Churchill (although often to get an appointment we are often now sent to Yatton Surgery). We need to shop in Budgen's in Churchill, Tesco Express in Congresbury or Co-op in Yatton. To use a bank we need to go to Winscombe. To use a cash machine we need to go to Budgen's in Churchill or Tesco Express in Congresbury. If Wrington is a Service Village, why do residents have to travel to and use the facilities and sevicees of other villages?</p> <p>To award Wrington a Green, implies that we have the same services and facilities as other service villages such as Congresbury, Yatton, Lond Ashton, etc and the same as if we were on the edge of one of the towns! This is simply not a true reflection of what Wrington is really like or the services it has to offer its residents. Reasonable access from this site is not achievable with the centre of the village being over 900 metres away and not accessible using footways. Cycling is also considered dangerous.</p> <p>SA OBJECTIVE 4 : Maintain and improve environmental quality and assets</p> <p>Sub-Objective 4.2 To protect and where possible enhance biodiversity and geodiversity at a landscape scale, particularly with respect to protected habitats and species</p> <p>The Ecology report submitted by the developer for the recent applications has indicated a high level of bat activity along the hedges of the site. WVA are concerned about the impacts of lighting on the bats. This area has an intrinsically dark sky that should be protected. Although the current applications propose low levels of lighting in their own lighting schemes (which may in themselves still be too high) the lighting that will emanate from the houses themselves cannot be controlled. More detail of this is provided in 'Ecology/Environmental' section of 'Site Suitability' above and shows that the intended assessment criteria of 'protecting and where possible enhancing biodiversity and geodiversity' is highly unlikely to be achievable and the development will have the potential to have a harmful impact on protected species and habitats. The assessment should therefore be changed to Red.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p data-bbox="521 320 1536 347">Sub-Objective 4.3 Minimise impact on and where appropriate enhance valued landscapes</p> <p data-bbox="521 387 1906 517">An Amber has been awarded, however the Planning and Regulatory Committee in July 2017, refused the application for 59 houses on the basis that the development failed to respect the character of the settlement, would be out of keeping with the rural landscape character and quality of the area and would result in harm to the rural setting and edge of the village here and was therefore contrary to DM10, DM32, CS5, CS12, CS14 and CS32.</p> <p data-bbox="521 557 1906 719">Although the number of houses on the duplicate application has been reduced to 28, the area in which the houses are to be built has also been significantly reduced, so the density of housing remains the same. This type of suburban development is not suitable for the rural setting of the edge of the village. It is out of context of the existing housing here and will cause an unacceptable harm to the character of the area, which is a picturesque rural village. The assessment rating should therefore be changed to Red.</p> <p data-bbox="521 759 1350 786">Sub-Objective 4.5 Minimise the loss of productive land, especially BMV</p> <p data-bbox="521 826 1827 888">This land is working agricultural land used by a local farmer. A formal BMV classification should be carried out to establish whether this is prime land which needs to be safeguarded and designate this assessment as Red.</p> <p data-bbox="521 928 1850 956">Sub-Objective 4.6 Minimise vulnerability to tidal/fluvial flooding, without increasing the risk of flood risk elsewhere</p> <p data-bbox="521 995 1895 1125">Wrington is considered a vulnerable village to flooding in the area surrounding this land is regular and well documented. Flooding in November 2016 resulted in roads around the site being impassable by cars and this land would have been cut off from the village. On this occasion the fire brigade considered mobilising pumps to remove flood waters and prevent damage to properties.</p> <p data-bbox="521 1165 1906 1327">An objection from a business in Burnett Industrial Estate (provided below) to the planning application indicates they have purchased a sump pump to keep water from their showroom, Lindon Lea (the cottage on the Cox's Green junction) has sand bags ever present in case of heavy rain. These are just two examples which illustrate flooding potential within this area and removal of agricultural land and replacing with hard surface roads is likely to increase flood risk elsewhere and impact on local housing and the safeguarded employment site at Burnett Industrial Estate.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Although the assessment criteria show this site outside of the flood zone 3, an assessment of green is questioned as this site has potential to increase flood risk elsewhere.</p> <p>Sub-Objective 4.8 Minimise impacts on air quality</p> <p>Unlike other service villages, there is no ‘A’ or ‘B’ roads within Wrington or serving the settlement to easily absorb additional traffic from this proposed development. Wrington is instead, served by a number of narrow rural roads which in areas are single width, but have competing demands of private vehicles, buses, school transport, agricultural vehicles and large goods vehicles servicing the two industrial areas. Additional housing on the edge of the settlement boundary with the access road almost opposite Havyatt Industrial Park will cause additional traffic and congestion in particular during peak traffic times for the Business Park.</p> <p>As the land is also not within a reasonable walking distance of the shops and school with the village, residents will use their cars to make these journeys adding to an already congested village centre. Both scenarios will increase congestion and impact on air quality. The assessment should therefore be re-considered as an Amber rating as it could add to highway capacity issues.</p> <p>SA OBJECTIVE 5: Minimise consumption of natural resources.</p> <p>Sub-Objective 5.1 Achieve reasonable access to sustainable transportation – frequency of bus services</p> <p>A Green has been awarded against assessment using Policy DM27, which gives the impression that Wrington has an acceptable and appropriate level of bus services. However this is not the case. Policy DM27 aims to ensure that “all new development is accessible by bus services and that services are provided at an appropriate level.” However, Wrington is served by one bus route only, the A2 which goes from Weston to Bristol Airport via Banwell, Winscombe, Sandford, Churchill and Wrington. These buses are available approximately hourly during the day but only to those destinations mentioned above. Surely to achieve a reasonable access to sustainable transportation, it is not just the frequency of bus services that should be taken into account – the destinations are also surely important!</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Weston is the only main town that can be accessed via public transport from Wrington. Residents would not be able to get to the other towns of Nailsea, Clevedon or Portishead, or the train station at Yatton, or the majority of the other service villages, making it impossible for the majority of residents to commute to work and start/finish at the standard office times.</p> <p>To get to Bristol, residents would be able to change at Bristol Airport and get the Bristol Flyer. However the earliest A2 bus leaving the village arrives at the airport at 8.12am. There is then the walk to the Flyer bus stop, wait for the next bus and journey into Bristol, which is at least 30 minutes at quiet times, much longer at rush hour. So it would be not possible to get to work in Bristol for 9am. The journey is also expensive. Even with the Flyer residents discount card, a return journey from Wirngotn to Bristol would cost £11.50 and then there maybe be an additional bus journey depending on the place of work in Bristol itself.</p> <p>Therefore, this assessment it is not Green, based on the fact that there is not an appropriate level of bus services from Wrington, due to the limited destinations that can actually be reached by bus.</p> <p>Sub-Objective 5.2 Proximity of bus stops</p> <p>A green has been awarded, however the nearest bus stops would only be 400m from the northern end of the site. Also, DM27 states that, “The nearest appropriate bus stops should be compliant with the necessary disability legislation with raised kerbs.” The nearest bus stops on Silver Street are not disability compliant. The bus stop leading into the village is on a normal unraised pavement, which is particularly narrow. The bus stop leaving the village has no pavement at all and is on rough ground by the Recreation Ground. The closest bus stops to the site that are disability compliant are outside the Golden Lion, which is over 800m from the site. This distance would score a Red. Neither of the bus stops closest to the site have a shelter, as recommended. Also, DM27 states that pedestrian access to the bus stops should be a well-lit, safe route with clear sight lines. The pedestrian access to the bus stops on Silver Street are poorly lit and on a road, on a sharp/ blind bend which does not have a foot way. As mentioned previously, installing a pavement here has not been shown to be possible. Therefore, this assessment needs to be amended to a Red.</p> <p>Sub-Objective 5.3 Achieve reasonable access to sustainable transportation – pedestrian and cycle ways</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>An amber has been awarded, however it is not considered that there is “safe and convenient connection to the surrounding area”. There are no footways on any of the roads surrounding the site or into the village. The roads are narrow and have a lot of HGVs, tractors and other farm vehicles using them. They roads are subject to surface water flooding and they are poorly lit. People walking on the roads wear hi-visibility vests even in the day and at night you need a torch to walk into the village. There are no cycle ways nearby and cycling is not considered safe on these roads.</p> <p>It has poor links to the surrounding area as it has no pavement or cycleway. The walk into the village is unsafe at a number of places where the footway disappears after Rickyard Road and then again on Silver Street into the village. There is a need to cross the road on Silver Street outside the Recreation Ground entrance where the pavement ends on one side of the road and starts on the other side. Crossing here is on a bend of the road, which is dangerous with children, pushchairs and wheelchair users. The facilities in the village itself are on roads without pavements, on a bend, with lots of parked cars at a busy road junction. The walk into the village really is treacherous in a number of locations, especially with children. The assessment for this sub-objective should be changed to Red.</p>	
14836321//2	Wrington Village Alliance	<p>On behalf of Wrington Village Alliance (WVA), I refer to the e-mail dated 1 August 2017 from Michael Reep and in particular reference to the above. We offer this document containing observations and comments relating to NSC’s Site Assessment, which we believe Council must take into consideration when considering this site.</p> <p>To simplify the process and avoid duplication of points raised, WVA have taken a copy of a document provided by Wrington Parish Council and have annotated it to show that we agree with the points raised and to provide additional narrative as appropriate.</p> <p>As a starting point we agree with the Wrington Parish Council’s general comments and observations detailed below pertaining to:</p>	 20170819 - Site Allocation Plan Review and Feedback v0c.docx (31 KB)

Comment ID	Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • Site Details • Site Suitability • Physical Factors • Planning Policy • Summary of Site Suitability and • Key Actions to explore to overcome constraints, ie. <ul style="list-style-type: none"> ◦ Flood Risk ◦ Local highway concerns But we have provided additional commentary regarding the individual SA Objectives as appropriate. ◦ Site Suitability ◦ Site Details – The industrial site to the west should not be described as “relatively hidden.” The “residential row” referred to comprises only 3 bungalows and the industrial site is clearly visible from the substantial majority of the proposed site. The proposed site access on to Havyatt Road will be almost opposite the entrance to the industrial site. The proposal to re-site some of the hedges would make the industrial site more visible, notably from first floor windows ◦ ◦ • Flood Risk Status In order to reflect the true situation, the following should be added to the first sentence;- “..with the surrounding lanes obstructed by water in flood conditions.” Photographic evidence is already with NSC to demonstrate this flooding. • Archaeology Any archaeological potential should be investigated. <ul style="list-style-type: none"> ◦ Landscape If built the site would be highly visible from the AONB and would impact on the green Wrington Vale landscape. It is suggested that the land has more than ‘moderate character’ and is arguably an essential element in the currently undeveloped landscape running alongside the river Yeo between Congresbury and Blagdon Lake. 	

Comment ID	Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> <li data-bbox="595 320 1912 555">• Ecology/Environmental There is already recorded evidence that the hedgerows on the site are used by bats for foraging. (Removing or re-siting hedges and any street lighting will be detrimental to these foragers.) It is suggested this section be re-worded as follows;- “The Congresbury Yeo (SNCI Wildlife site) flows to the south of the site and a watercourse flows through the site. There are hedgerows through and round the perimeter of the site, all having ecological value, some of these proposed for removal or relocation. The grazing land provides a valuable foraging and flight route link for bats, in comparison with the increasingly more arable use of land to the east.” <li data-bbox="595 592 1912 724">• Transport and highways It is suggested this be re-worded as follows;- “Local highways concerns have been raised eg narrow country roads, with very limited space available for commercial vehicle traffic associated with the industrial estates and no provision for pedestrians. A satisfactory solution would be required at the planning application stage.” <li data-bbox="595 761 1912 861">• Site Access Does ‘Yes’ mean there is access or that access will be satisfactory? Access is currently via a farm gate on a narrow country lane close to the brow of a hill and a blind bend. Please re-consider this apparently meaningless response. <li data-bbox="595 962 1912 1094">• Site/area character This site is remote from the village centre, but is outside the Settlement boundary and adjacent land to the north of Cox’s Green is Green Belt land with agricultural land on the east and south of the site. It therefore follows that the proposed development cannot possibly be described as compatible with surrounding uses and development of the site must have some impact on the openness of the Green Belt. <li data-bbox="595 1099 824 1126">• Physical Factors <li data-bbox="595 1131 1912 1299">• Topography There is a ridge running across the site in an east/west direction which will result in any development being highly visible from all angles. The presence of this ridge and the attendant surface water drainage to the north will consequently render parts of the site marshy at times of high rainfall and also results in flooding on Cox’s Green, Havyatt Road and Wrington Bridge. NSC already has photographs to support this aspect. <li data-bbox="595 1303 815 1331">• Planning Policy 	

Comment ID	Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • Whilst this Council is pleased to note that the “site is not currently or proposed to be allocated”, we would question whether the designation of a service village can now reasonably be allocated to Wrington as many of the facilities and RAG designations allotted in the document’s SA Objectives attached to this Assessment do not appear to stand up to challenge (See further comments below). We would also contend that the proposed development does not respect the character of the village and exceeds the limit of 25 houses set out in NSC’s Core Strategy CS32 para 4.85. • Summary of Site Suitability • Site availability We understand the site to be owned by an individual but the developer is promoting development of the site. Proposals by the developer to install footpaths along Cox’s Green northwards are confounded by land up to the highway being in the ownership of residents, not North Somerset Council and therefore safe pedestrian access from the site is not achievable without total compliance from those residents. • Site achievability • Viability constraints There exist constraints as to access, sustainability and flooding (see elsewhere in these comments). • Potentially competing sites It must not be overlooked that the same developer has an outline planning application for 59 houses on this site and adjacent, currently the subject of appeal (16/P/1291/O). • Status of development interest We would question the ownership of this land which we understand may be owned by an individual (Mr Islwyn Thomas) not Redcliffe Homes. <ul style="list-style-type: none"> ◦ Key actions to explore to overcome constraints ◦ WVA Note: We agree with the comments above. • Flood Risk This Council respectfully suggests that the Flood Risk team have not understood fully the nature and causes of flooding in this area of the village and have not taken into account the topography of the site, through which runs a ridge of land. This ridge defines that water draining to the north of the ridge flows on to Cox’s Green and Havyatt Road whereas to the south it drains towards the river Yeo. The river itself floods 	

Comment ID	Organisation	Comment	Attached documents
		<p>surrounding land at times of heavy rain (the industrial estate has suffered flooding in the past). North Somerset Council is already in possession of photographic evidence of flooding events relating to the site and without major works, no amount of planning conditioning will achieve a satisfactory result to deal with both surface water drainage (which will be exacerbated by the development of the site) as well as foul water and sewage removal. Substantial capital investment would appear to be necessary in order to provide increased surface water drainage capacity from Cox's Green to the west.</p> <ul style="list-style-type: none"> • WVA Note: We agree with the comments above. • Local highway concerns It is doubtful whether safe pedestrian access to the village could be achieved as the land which would need to be utilised in providing such is in the ownership of private homeowners and is arguably not Highways land. If such cannot be achieved, then the site remains unsustainable in planning terms as it cannot ensure a safe pedestrian access to the centre of Wrington. Any increase in traffic flows will add to the congestion and other difficulties already experienced in the centre of the village. WVA Note: We agree with the comments above. WVA Note: We agree with the comments above. The service provided by the "Branch Surgery" in Wrington is nonexistent; it is only available for extremely limited Doctor's Appointments; as and when Doctors are available. This is typically for only two Pre-booked appointments (08:30 and 08:45) on Wednesdays and Thursdays. No Nursing Appointments are provided.SA OBJECTIVE 2 : Support Communities that meet people's needsSub-Objective 2.1 Bearing in mind the acknowledged lack of safe pedestrian access to the village centre from the site, it would seem arguably more appropriate to designate this sub-objective as Red. (Note also the comments under 'Site Suitability' above.) • • Sub-Objective 1.4 This designation should now be Red. The provision of medical facilities within the village has been withdrawn. 'As the crow flies', the distance to the nearest facilities (Pudding Pie Lane, Langford) is circa 3km, but clearly cannot be reached that easily. Using road transport (car is the only reasonable way to reach it as there is no direct bus service), the distance from site to medical facilities is slightly in excess of 5km and this rating must therefore now be Red. • Sub-Objective 1.2 The football pitch on the recreation field is currently only available for use by the Wrington Redhill Football Club, not for wider community use, although this might change. An assessment of Red is therefore appropriate, not Amber. • SA OBJECTIVE 1 : Improve Health and well-being • WVA Note: We agree with the comments above. 	

Comment ID	Organisation	Comment	Attached documents
		<p>WVA Note: We agree with the comments above. It is clear that the settlement only has benefit of a very limited range of community facilities: a village shop with a Post Office counter service, 2 pubs, a primary school and village hall. Access to these facilities is along roads with missing and fragmented pavements for pedestrians. The nearest supermarket is over 12 km away at Clevedon. Most forms of recreation and leisure will involve a journey to Clevedon or Weston. Weston is accessible by public Transport (with difficulty) so journeys to these facilities will be made by car.</p> <p>Sub-Objective 2.2 In this Council’s view the village primary school has a limited capacity and any expansion would be both costly and disruptive in terms of increased staffing requirements and increased classroom facilities. Some classes are already having to be accommodated in ‘portakabin’ type buildings. This aspect should therefore be rated as ‘Amber’.</p> <p>WVA Note: We agree with the comments above. The “Pupil Projections from North Somerset Schools 2016 – 2020” is now available on the North Somerset Website. It shows the latest round of projections and has a spare capacity of 11 places in 2017 which is approximately 10%. The assessment and interpretation of these numbers must be questioned as the current NSC’s School Admissions website shows zero places available in Wrington C of E Primary School after the first round of allocations in 2017. Previous Pupil Projects for the years leading up to 2017 also show capacity at the primary school but historically it has always been oversubscribed with children within the village being directed to schools outside of the village, eg. Burrington Church of England Primary School. Two school aged children recently moved in to the village have been refused places at Wrington and have been directed to Burrington for Sep-2017. The placement of children in schools outside the settlement will require daily transport to and from school with the associated costs. This aspect should therefore be rated as ‘Amber’ or even ‘Red’.</p> <p>Sub-Objective 2.4 There is definitely not access to ‘a wide range of local job opportunities’ within the local settlement. Job opportunities within the settlement are very limited with most businesses employing a relatively small number of staff, many of whom commute into Wrington to work. We are not aware of any job vacancies currently advertised within the settlement. In this Council’s view, this aspect should be rated as a minimum of Amber.</p> <p>WVA Note: We agree with the comments above. In addition, the 2011 Census shows that 84% of the Wrington Ward travel to work by private car. This is borne out by a survey undertaken by WVA of employees of the Estates. This underlines the fact that the majority of people travel outside of the settlement for employment.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Sub-Objective 2.5 This Council maintains that it is arguable as to whether Wrington should be classified as a service village in view of the dilution of facilities available in recent times. There are grounds for re-visiting this designation which if upheld, would potentially dilute this assessment to Amber or even Red.</p> <p>WVA Note: We agree with the comments above. We also note that the wording is ambiguous; the description majors on “reasonable access to town Centre services and facilities” yet the assessment refers to town or service village. Which are not comparable in terms of services or access.</p> <p>Wrington is at the bottom of NSCs classification of Service Villages and has comparable scores to that of infill villages. The nearest Town Centre is 12km away at Clevedon and there is NO Bus to Clevedon necessitating a car journey.</p> <p>SA OBJECTIVE 4 : Maintain and improve environmental quality and assets</p> <p>Sub-Objective 4.2 WVA Note: We consider this site to be a Heritage Asset as it is recognised as the site of a former Village Green. It should therefore be rated as Red.</p> <p>WVA Note: We agree with the comments above.</p> <p>Sub-Objective 4.2 Please provide details as to what impacts can be mitigated. (note also our comments above under ‘Site suitability’.) There are acknowledged risks to the river Yeo SNCI Site as NSC suggests drainage for the site could be diverted to the river Yeo. It cannot for reasons explained elsewhere. There will also be impacts upon bat habitat, also acknowledged by the developer. The title of this sub-objective is to ‘protect and where possible enhance bio-diversity...particularly with respect to protected habitats and species’. This proposed development fails to enhance anything! It should therefore be rated as Red.</p> <p>WVA Note: We agree with the comments above.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Sub-Objective 4.3 The site will of course be highly visible from the Mendip Hills AONB, particularly as its straddles an elevated ridge running through the site and will also have a visual impact upon the properties existing on Cox’s Green and Havyatt Road. There is an argument that this rating should therefore be Red, not Amber.</p> <p>WVA Note: We agree with the comments above. In addition it should be noted that the Site falls within J2: River Yeo Rolling Valley Farmland. Long distance views to Mendips AONB. Any development on his site will have a negative impact on the locality, on Wrington Vale generally, on views from the Mendip Hills ANOB and from the elevated land to the north, especially when trees are not in leaf.</p> <p>The land is a stepping stone – a strip of land between ANOB and Green Belt.</p> <p>The River Yeo is to the south of the proposed site and is a designated Wildlife Site / SNCI and would be affected by increase surface water flow off site.</p> <p>North Somerset & Mendip Bats Special Area of Conservation (SAC) which is less than 5km away. It is unclear how the Developers will mitigate LUX levels from individual dwellings.</p> <p>The site is recognised by NSC as Greater Horseshoe Bat habitat for foraging.</p> <p>Sub-Objective 4.5 Without formal classification as BMV land, this designation is pure guesswork. We would urge an assessment be undertaken to clarify, since to build on BMV land would not be acceptable unless very pressing needs were demonstrated, but which to date have not been put forward.</p> <p>WVA Note: We agree with the comments above. In addition it should be noted that the NSC’s Historic Environment Records Officer has commented that “most of the area has been in agricultural use for the last 1,000 years”.</p> <p>Sub-Objective 4.6 Although the site is technically outside Flood Zones 2 and 3, there exist persistent flooding issues which have been the subject of multiple correspondence between this Council and NSC. It appears to this Council that there is a fundamental misunderstanding of the causes for the flooding but it is clear to this Council that any development on the site would only serve to exacerbate the flooding issues already in place. Conditioning any development is not the holistic solution to this problem and a full and comprehensive investigation in order to reach a proper and complete</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>understanding of the fundamental causes of the flooding needs to be undertaken. In the circumstances therefore, it is difficult, not to say nonsensical, (and potentially dangerous) to attribute a rating of Green to this objective, particularly when Sub-Objective 4.7 is rated as Red. It is noted also that there is no assessment of potential downstream impacts as there are obvious physical constraints at say, Tumbling Weir and Beam Bridge where flooding has been experienced in the past and the fields from Beam Bridge towards Congresbury and Iwood which are also flooded at times of heavy rainfall. Any further run-off from the site must aggravate flooding potential downstream.</p> <p>WVA Note: We agree with the comments above.</p> <p>Sub-Objective 4.8 Local residents frequently experience delays and traffic jams along Havyatt Road due to vehicles accessing the industrial estate as well as incoming and outgoing commuters using this lane to reach the A38. Nates Lane is very narrow and unsuitable for this purpose. It is inevitable that motor car will be the preferred means of leaving the site by residents, particularly those commuting outside the village. The bus service is generally unsuitable to meet commuters' needs and cycling is not to be recommended along the narrow access lanes into and out of the village. It follows therefore that any development on this site would add to highways issues already exacerbated by recent developments within the village, notably shop to residential conversions and so the objective should be rated as Amber and not Green.</p> <p>WVA Note: We agree with the comments above. The Developer's assessment of impact on local traffic was based upon Traffic Statistics which were collected during NS School Holidays are therefore flawed. All roads in to the proposed site are narrow lanes already struggling to cope with Heavy Goods traffic delivering to the Burnett Industrial Estate and Havyatt Business Park.</p> <p>All these roads (Coxs Green, Havyatt and Nates Lane) are in Flood Zone 2 or 3 and will prevent safe access to / from the site in times of Flooding.</p> <p>SA OBJECTIVE 5 : Minimise consumption of natural resources.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>Sub-Objective 5.1 To rate this as Green is a nonsense. Bus services in Wrington do not connect with any of the neighbouring settlements of Clevedon, Nailsea and Portishead and certainly not within a 30 minute timescale. Travelling time to Weston-super-Mare is currently well in excess of 15 minutes. There is no bus service to Congresbury or Yatton The only bus service through Wrington is service A2 which has a limited timetable with no service on Sundays or Bank Holidays and funding for which has recently been withdrawn by First as the service is claimed to be not viable. Red is the appropriate designation for this objective.</p> <p>WVA Note: We agree with the comments above. The 2011 Census records that 84% of all journeys to / from work are by car. This shows that the local Bus service is not a viable transport method for people travelling to their place of work from the settlement (or this development). The assessment does not take in to account the quality of the Bus Service which only runs between Wrington and Weston-super-mare and Wrington and Bristol Airport. There is no direct link to Bristol or any of the surrounding Towns of Clevedon, Portishead, etc.</p> <p>Sub-Objective 5.2 Although a bus stop may be close to the site, please note the comments set out above under Sub-Objective 5.1.</p> <p>WVA Note: We agree with the comments above.</p> <p>Sub-Objective 5.3 There are currently no pedestrian pavements enabling safe access to the village centre from the site, and although the developer has proposed a scheme to achieve such, the viability of that scheme/proposal is very much in doubt (see comments under ‘Site Availability’ above.). It is not easy to understand how cycle links could be improved either, with the narrowness of the access lanes to Wrington being one constraining factor. An appropriate classification for this sub-objective must therefore be Red.</p> <p>WVA Note: We agree with the comments above. In addition, the proposed footpath is in Zone 2 / 3 of the Environment Agency Flood Map and Floods on a regular basis making impassable to foot traffic.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>There are NO continuous pavements or cycleways providing safe access out of the settlement without bringing pedestrians and cyclists in to close contact with traffic.</p> <p>Access to Clevedon, Weston and Bristol involves crossing busy main roads (A38, A370).</p> <p>Sub-Objective 5.5 How can this rate as Amber (adjacent to the settlement boundary) yet be Red if it is outside the settlement boundary? Surely ‘outside the settlement boundary’ means outside the settlement boundary and the classification should therefore be Red.</p> <p>WVA Note: We agree with the comments above.</p>	

Document Section/Site	Barrow Hospital
------------------------------	-----------------

Comment ID	Organisation	Comment	Attached documents
5950689//2	Environment Agency	Barrow Hospital – Although the site is within land designated as Flood Zone 1, it is at risk from a potential breach of the Barrow Reservoirs. Accordingly, the Agency must advise against any ground floor sleeping accommodation within the reservoir inundation zone. The Council’s Civil Contingencies Officer/Emergency Planning Officer should be consulted in respect of this proposed allocation.	
14590529//27	Persimmon Homes Severn Valley	Barrow Hospital – the development industry consortium agree that this site has the potential to deliver in 5 years	




Document Section/Site	F Sweeting and Son, Station Road, Sandford
------------------------------	--

Comment ID	Organisation	Comment	Attached documents
5950689//5	Environment Agency	F Sweeting and Son, Station Rd, Sandford – The Agency has previously objected to a proposed development at this site however, if any buildings and associated drainage works are located out of the designated floodplain, development may be appropriate.	
14590529//28	Persimmon Homes Severn Valley	F Sweeting & Son, Sandford – The Site is detached from settlement, is not currently available (haulage yard) and lies adjacent to AONB. Objections have been submitted to the planning application from various consultees including: Environment Agency, Internal Levels IDB, Noise and Highways. Council assessment also recognise constraints in terms of pylon corridor, Towerhead Brook, contamination, archaeology, ecology, AONB, safe access, sustainability and viability. In addition, the Council confirm that a response was received from the Agent / Developer which cannot confirm the deliverability of this site	

Document Section/Site	Winford Coach Station, 10 High Street, Winford
------------------------------	--



Comment ID	Organisation	Comment	Attached documents
5950689//13	Environment Agency	Winford Coach Station – Although the site is primarily in Flood Zone 1, a small area of Flood Zone 3 is included. The Agency would advise that access and egress issues could arise, in the event of the B3130 flooding	
14590529//29	Persimmon Homes Severn Valley	Winford Coach Station - the development industry consortium agree that this site has the potential to deliver in 5 years.	


Document Section/Site	General comments on deliverability and site assessments
------------------------------	---

Comment ID	Organisation	Comment	Attached documents
14154817//1	Barton Willmore	There is a strong case for developing an urban extension at Pill Green , Easton in Gordano	 25514 A3 LMT jmm 170821 Scan ltr NSC Pill Green.pdf (209 KB)  Appendix A.pdf (425 KB)
8134145//1	Bleadon Parish Council	<p>Thank you for sharing this information and for giving us the opportunity to feedback. Bleadon Parish Council reviewed the content and noted that the schedule of 28 additional sites that have been identified in Part 2 of the document ‘Sites within the development Management process as at 26 June 2017’ requesting feedback for 21st August, does not contain sites within Bleadon.</p> <p>Planning sites for Bleadon are contained within Part 1 of the document highlighted above under the heading ‘Sites that will not be further assessed at this stage’.</p> <ul style="list-style-type: none"> • Land off Bridgwater Road, Bleadon; <i>Capacity</i> - 70 • Land North of Amesbury Drive, Bleadon; <i>Capacity</i> - 24 • Land off Purn Way, Bleadon; <i>Capacity</i> - 16 <p>Bleadon Parish Council would like to highlight to North Somerset Council their previous objections to the 70 dwellings off Bridgwater Road (17/P/1138/O) within Weston-Super-Mare Town Council and to the planning application of up to 16 dwellings at Purn Way (17/P/1351/0)</p>	
14891105//1	Turley Associates Ltd	<p>Overall, by failing to assess all potential sites, the Council have underestimated the potential supply of suitable and sustainable sites. We do not consider that this approach will result in sufficient modifications to the plan to enable the</p> <p>Inspector to find it sound. Our client’s site at Yatton (Stowey Rd) should be considered as an allocation and sufficient sites to accommodate the</p> <p>full 2,500 dwellings suggested by the Inspector should be properly tested.</p>	 FW N Somerset Site Allocations Plan - further assessment of residential sites.msg (423 KB)


Comment ID	Organisation	Comment	Attached documents
7688737//1	Congresbury Parish Council	Village extension - service village Land off Wrington Lane, Congresbury 50 Approved (awaiting appeal decision) 15/P/2828/O - This site should not be on the list in view of the inspector's recent decision at appeal.	
7688737//3	Congresbury Parish Council	Countryside - Sousta Taverna, Congresbury 24 Pre-application 17/P/0125/PRE – The Parish Council is aware that this site is not in compliance with CS32, however we believe that this site should be considered as it would make the residents living in Station Close less isolated and is a sustainable site for potential development	
931233//1	CPRE North Somerset	<p>CPRE (Campaign to Protect Rural England) North Somerset welcomes the opportunity to respond to the North Somerset Council Consultation on the Site Allocations Plan – Further Site Assessments.</p> <p>We support a sequential approach to sites that accord with the Core Strategy.</p> <p>Weston-super-Mare being the second largest urban area to Bristol in the West of England should be a priority in terms of sites brought forward, followed by the towns of Clevedon, Portishead and Nailsea. These also have the greatest opportunity to re-develop brownfield land, are better served by public transport and offer a wider range of employment opportunities.</p> <p>Weston-super-Mare has a clear vision for the future offering opportunities for urban regeneration, much of this urgently needed. The result of this regeneration should be higher density, good quality housing that reflects local heritage and enhances the character of the town.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>We have not examined the sustainability assessments for the residential sites. Each local community should be best placed to comment on the specifics of these but we continue to be concerned for North Somerset's 'ordinary countryside', particularly around service villages. The environmental quality in terms of the daily life of the community for many of these sites should not be under estimated. It has a wide impact on health and wellbeing and is essential if we are to retain the rural character of North Somerset.</p> <p>Unfortunately, the hiatus brought about by the challenge to North Somerset's Core Strategy has meant many approvals that are not in accordance with the Core Strategy policies. Having approved these though, they should be considered as windfall and contribute to the overall numbers</p>	
5950689//14	Environment Agency	<p>The following comments must be noted: There shall be no development within any areas of functional floodplain.</p> <ul style="list-style-type: none"> • The Agency would request details of the application of the Sequential Test, where applicable. • Any development wholly or partly within flood zone 3a will be subject to the requirements of the Exception Test, including the provision of an appropriate Flood Risk Assessment (FRA). Any requisite FRA must provide, inter alia, full details of; the actual flood risk, all flood resistance/ resilience proposals and safe evacuation measures, to ensure the development and its users remain safe without increasing third party flood risk. Where appropriate, details of flood compensation proposals must be submitted. • Any development within flood zone 3a should avoid sleeping accommodation on the ground floor. 	
5950689//22	Environment Agency	<p><u>Pollution Prevention</u></p> <p>National Planning Policy Framework paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from</p>	


Comment ID	Organisation	Comment	Attached documents
		<p>contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution.</p> <p>Paragraph 120 states that local policies and decisions should ensure that new development is appropriate for its location, having regard to the effects of pollution on health or the natural environment, taking account of the potential sensitivity of the area or proposed development to adverse effects from pollution.</p> <p><u>Ground Contamination</u></p> <p>With regard to previously developed and/or operated sites, Government policy states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121</p>	
14605697//1	Grassroots Planning Ltd	<p>We have demonstrated within this response that technical work undertaken to support a forthcoming application for land to the west of the M5, Locking, can overcome the Council's concerns about the site and its suitability for development.</p> <p>Mitigation proposals such as a noise bund, acoustic fencing, and providing an offset to the Grumblepill Rhyne will ensure that the site's development will become acceptable in planning terms and as such, we consider that the site scores very highly and should be considered for allocation, to help the Council meet its five-year housing land supply deficit.</p> <p>The site is located in a sustainable location on the edge of Weston-super-Mare and as such is well placed for residents to be able to walk or cycle to everyday facilities as well as employment opportunities. Public transport can also be easily accessed from the site. In relation to the Council's own assessment, the site scores highly and needs to be allocated to meet housing needs now.</p> <p>We therefore ask the Council to further consider the site as an allocation for development of up to 120 dwellings in the Sites and Policies Plan Part 2, which can be delivered in the next five years.</p>	<p> Representations to NSC Assessment of Residential Sites (Part 1 of 2).msg (5.9 MB)</p> <p> Representations to NSC Assessment of Residential Sites (Part 2 of 2).msg (4.7 MB)</p>


Comment ID	Organisation	Comment	Attached documents
17400321//3	Walsingham Planning	<p>The instructions from the Inspector on the work that LPA needed to undertake following the hearings are clear and unambiguous. It is therefore extremely disappointing that the LPA has decided to attempt to row back on what was agreed during the hearing sessions, and has not tested the potential for the provision of up to 2,500 additional houses. Even if all of the 28 sites subject to this consultation were deliverable by 2026, they would only deliver a total of 1,812 dwellings. This falls significantly short of the figure of 2,500 dwellings that the LPA was asked to test.</p> <p>As set out above the reason for the LPA's failure to identify a sufficient number of sites is due to the unsound methodology that they have used, in particular the decision to limit the scope of the assessment to sites that were in the development pipeline before the Inspector issued her note (ID4) on 18th May 2017. This decision is counterintuitive and contrary to the Inspector's request for the LPA to work closely with the development industry. It also results in the exclusion of a number of sites, that are broadly in accordance with the Core Strategy and which could be delivered in the next 5 years</p> <p>An initial assessment of the sites that the LPA has shortlisted for highlights the pitfalls of limiting the exercise to sites currently within the development pipeline. For example:</p> <p>At least nine of the sites lie wholly or partially within Flood Zone 3a. A process that is not restricted to sites within the development pipeline would allow an assessment of whether there are sites in areas less vulnerable to flooding.</p> <p>Four of the sites are currently provisionally allocated for other uses in the SAP. These proposed uses would need to be re-provided elsewhere. However, there is no evidence that the LPA has identified alternative sites.</p> <p>One of the sites is unlikely to be deliverable due to environmental constraints, while a further two are unavailable due to land ownership issues.</p>	 Site Allocations Plan Further Residential Sites consultation.msg (4.5 MB)

Comment ID	Organisation	Comment	Attached documents
		<p>On this basis it is clear that not all of the sites subject to this consultation will be suitable for allocation. It is also clear that a number of sites that may be considered favourable are not necessarily preferable to those excluded from the process due to the LPA's arbitrary decision to only consider sites that were in the development pipeline before 18th May 2017.</p> <p>Should the LPA continue on their current path then the additional allocations that they propose will not be able to deliver the 2,500 dwellings that are required, and will also not necessarily be the best of the available sites. This is a fundamental flaw that will either result in the Inspector asking the LPA to go away and undertake a more robust sites assessment exercise, or in the worst case scenario finding the SAP unsound.</p> <p>In order to avoid this outcome we strongly urge the Council to pause the process and undertake a more thorough site assessment process. While there is understandably a desire to get back to examination as soon as possible, the current approach will undoubtedly result in further delays (or worse) in the future.</p> <p>However, it is also clear that the Council will need to identify additional sites and as such the following potential development land is commended to the</p> <p>Council:</p> <ol style="list-style-type: none"> 1) Land off Ebdon Road (circa 27 dwellings) 2) Land at Lynchmead Farm, Ebdon (up to 300 dwellings) 3) Land at Manor Farm, Collum Lane, Worle (up to 90 dwellings) 4) Land at Home Farm, Kewstoke (up to 630 dwellings) <p>These sites are known to the Council having previously been submitted in relation to the West of England Joint Spatial Plan Call for Sites exercise</p>	


Comment ID	Organisation	Comment	Attached documents
17568737//1		<p>Portishead Further Development Objection</p> <p>I feel very strongly that is not in the towns best interests to build further housing in the town at present.</p> <p>The roads are already struggling with the current volume of traffic, the high street is regularly congested in the mornings and again from 3pm onwards.</p> <p>The motorway junction for Portishead, despite recent expansion is still hazardous at rush hour and will only get worse if the volume of traffic from new residents from these proposed developments.</p> <p>Primary Schools routinely are over subscribed and being walking distance to your childs school is a rarity!</p> <p>The Dr's are struggling already and increasing the numbers using these services would only put them I've more pressure and compromise level of care.</p> <p>My daughter is nearly 2, we live on the village quarter and I am concerned that by the time she is of school age she won't be able to get a space at either Trinity or Portishead or in fact anywhere in Portishead and we end up out of the town which is a disgrace when we live less than 1 mile of 2 primary schools.</p> <p>Improvements need to be made (not empty promises) to infrastructure and services before any further expansion is made. Money and greed seem to be the driving force and common sense and the already shamefully state of our stretched services and facilities ignored.</p>	
15574465//2	Aston and Co.	<p>Landowners and developers contacted for delivery information</p>	<p> SAP Response_Aston_20.08.17.pdf (343 KB)</p>




Comment ID	Organisation	Comment	Attached documents
		<p>Q2) This question sought a response as to whether a site is under control of a house builder. No documentation in the form of option agreements, or copy Land Registry titles was requested to provide evidence in support of the information collated. The data supplied is therefore not robust, nor evidence based.</p> <p>Q5) It is unlikely that any developer seeking allocation of development land would identify constraints on its supply and they are notoriously optimistic in forecasting delivery/supply rates.</p> <p>Schedule of sites to be assessed</p> <p>Only '<i>Sites within the development management process as at 26th June 2017</i>' have been considered. The SAP examination for the existing local plan has identified a significant 5-year housing under supply and as the Inspector recognised this needs to be urgently addressed.</p> <p>The review undertaken is far too narrow to produce the desired outcome. The West of England Joint Strategic Partnership (JSP) is already significantly advanced in its consultations regarding meeting housing demand and has drawn in valuable site data. North Somerset District Council's (NSDC) Replacement Local Plan process has similarly undertaken a 'call for sites 2017' and is due to commence consultation this Autumn. The housing land availability assessment by NSDC needs to be much broader now and the review widened to have any hope of improving the 5-year land supply.</p> <p>It is acknowledged that NSDC, in common with many authorities face challenges meeting 5-year land supply. In this authority's case due to the twin constraints of flood zone and Green Belt that affect much of the district.</p> <p>They are not alone and Bath and North East Somerset have faced this challenge and thought broadly and widely to find solutions. In their case the dual challenges were the Bath and Bristol Green Belt and World Heritage Status. They took decisions to release land from Green Belt at East Keynsham (16/00850/OUT). Within NSDC the same detailed review is necessary and the three councils need to cooperate and collaborate more effectively in reviewing the Green Belt against its original defining objectives from 1954</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>So that solutions can be identified. It is not sustainable to continue to develop within areas at risk of flooding.</p> <p>The Inspector recommended closer working between NSDC and developers and land promoters. NSDC have not taken that recommendation forward in the necessary manner. We offered to be engaged but the scope of the review was so narrow that offer was rejected. A strategic review working with the JSP is necessary.</p>	
11854273//1	Rocke Associates	<p>The allegation in the joint response by the development industry, that the site selection process has been arbitrary and is lacking in transparency, is therefore fully endorsed by the specific example of my clients' omission site at Laneys Drove. It confirms that there is no robustly evidenced and properly justified basis to support the Council's contention that they are unable to make provision for the additional 2,500 dwellings held by the Inspector to be necessary in a manner that would be consistent with the Core Strategy policy framework.</p> <p>Having regard to the foregoing submissions, and those contained in the Joint Response of the Development Industry, the Council is strongly urged to review its approach to selection of the sites taken forward for further assessment. For reasons set out in the joint response, at the very least it should include all non-Green Belt sites put forward as omission sites and that are well advanced in the planning process.</p> <p>It should therefore include my clients' omission site at Laney's Drove. Failure to respond to the deficiencies of the process identified by the development industry, as thrown into sharp relief by the case of my clients' site at Laneys Drove, could, at best, further delay the Examination process, and at worst, result in a finding that the SAP is unsound.</p>	<p> North Somerset Site Allocations Plan Examination Consultation on Further Residential Site Assessments.msg (344 KB)</p>


Comment ID	Organisation	Comment	Attached documents
		<p>Unless these deficiencies are rectified, my clients intend to make further representations along the above lines in response to formal consultation in due course on the Council's response to the Inspector's preliminary findings.</p>	
16098881//1	Nailsea Holdings LVA LLP	<p>The instructions from the Inspector on the work that LPA needed to undertake following the hearings are clear and unambiguous. It is therefore extremely disappointing that the LPA has decided to attempt to row back on what was agreed during the hearing sessions, and has not tested the potential for the provision of up to 2,500 additional houses. Even if all of the 28 sites subject to this consultation were deliverable by 2026, they would only deliver a total of 1,812 dwellings. This falls significantly short of the figure of 2,500 dwellings that the LPA was asked to test.</p> <p>As set out above the reason for the LPA's failure to identify a sufficient number of sites is due to the unsound methodology that they have used, in particular the decision to limit the scope of the assessment to sites that were in the development pipeline before the Inspector issued her note (ID4) on 18th May 2017. This decision is counterintuitive and contrary to the Inspector's request for the LPA to work closely with the development industry. It also results in the exclusion of a number of sites, that are broadly in accordance with the Core Strategy and which could be delivered in the next 5 years.</p> <p>An initial assessment of the sites that the LPA has shortlisted for highlights the pitfalls of limiting the exercise to sites currently within the development pipeline. For example:</p> <p>At least nine of the sites lie wholly or partially within Flood Zone 3a. A process that is not restricted to sites within the development pipeline would allow an assessment of whether there are sites in areas less vulnerable to flooding.</p>	<p> Site Allocations Plan Further Residential Sites consultation.msg (319 KB)</p>

Comment ID	Organisation	Comment	Attached documents
		<p>Four of the sites are currently provisionally allocated for other uses in the SAP. These proposed uses would need to be re-provided elsewhere. However, there is no evidence that the LPA has identified alternative sites.</p> <p>One of the sites is unlikely to be deliverable due to environmental constraints, while a further two are unavailable due to land ownership issues.</p> <p>On this basis it is clear that not all of the sites subject to this consultation will be suitable for allocation. It is also clear that a number of sites that may be considered favorable are not necessarily preferable to those excluded from the process due to the LPA's arbitrary decision to only consider sites that were in the development pipeline before 18th May 2017.</p> <p>Should the LPA continue on their current path then the additional allocations that they propose will not be able to deliver the 2,500 dwellings that are required, and will also not necessarily be the best of the available sites. This is a fundamental flaw that will either result in the Inspector asking the LPA to go away and undertake a more robust sites assessment exercise, or in the worst case scenario finding the SAP unsound.</p> <p>In order to avoid this outcome we strongly urge the Council to pause the process and undertake a more thorough site assessment process. While there is understandably a desire to get back to examination as soon as possible, the current approach will undoubtedly result in further delays (or worse) in the future.</p>	
1018753//2	Natural England	<p>We have considered the assessments for the each of the sites listed. Overall we are happy the main potential environmental issues for each site have been identified, including with respect to the Mendip Hills AONB and North Somerset & Mendip Bats SAC. We also agree that most of these issues appear capable of being addressed however have concerns re: Youngwood Lane Nailsea</p>	


Comment ID	Organisation	Comment	Attached documents
14889313//1	Newland Homes	<p>.</p> <p>The instructions from the Inspector on the work that LPA needed to undertake following the hearings are clear and unambiguous. It is therefore extremely disappointing that the LPA has decided to attempt to row back on what was agreed during the hearing sessions, and has not tested the potential for the provision of up to 2,500 additional houses. Even if all of the 28 sites subject to this consultation were deliverable by 2026, they would only deliver a total of 1,812 dwellings. This falls significantly short of the figure of 2,500 dwellings that the LPA was asked to test. As set out above the reason for the LPA's failure to identify a sufficient number of sites is due to the unsound methodology that they have used, in particular the decision to limit the scope of the assessment to sites that were in the development pipeline before the Inspector issued her note (ID4) on 18th May 2017. This decision is counterintuitive and contrary to the Inspector's request for the LPA to work closely with the development industry. It also results in the exclusion of a number of sites, such as the Land South of William Daw Close, that are in accordance with the Core Strategy and which could be delivered in the next 5 years.</p> <p>An initial assessment of the sites that the LPA has shortlisted for highlights the pitfalls of limiting the exercise to sites currently within the development pipeline. For example:</p> <ul style="list-style-type: none"> • At least nine of the sites lie wholly or partially within Flood Zone 3a. A process that is not restricted to sites within the development pipeline would allow an assessment of whether there are sites in areas less vulnerable to flooding. • Four of the sites are currently provisionally allocated for other uses in the SAP. These proposed uses would need to be re-provided elsewhere. However, there is no evidence that the LPA has identified alternative sites. • One of the sites is unlikely to be deliverable due to environmental constraints, while a further two are unavailable due to land ownership issues. On this basis it is clear that not all of the sites subject to this consultation will be suitable for allocation. <p>It is also clear that a number of sites that may be considered favorably are not necessarily preferable to</p>	 Newland Homes appendix 1 (11.9 MB)

Comment ID	Organisation	Comment	Attached documents
		<p>those excluded from the process due to the LPA's arbitrary decision to only consider sites that were in the development pipeline before 18th May 2017.</p> <p>Should the LPA continue on their current path then the additional allocations that they propose will not be able to deliver the 2,500 dwellings that are required, and will also not necessarily be the best of the available sites. This is a fundamental flaw that will either result in the Inspector asking the LPA to go away and undertake a more robust sites assessment exercise, or in the worst case scenario finding the SAP unsound.</p> <p>In order to avoid this outcome I strongly urge the Council to pause the process and undertake a more thorough site assessment process. While there is understandably a desire to get back to examination as soon as possible, the current approach will undoubtedly result in further delays (or worse) in the future.</p>	
14824321//1		<p>It is now clear from NSDC interim response that it wishes to exclude what is in our view an available, sustainable and deliverable sites from any consideration whatsoever from its evidence based on an arbitrary date set by them of 26th June 2017. Clearly Rectory Farm has made very meaningful and purposeful attempts to engage NSDC well in advance of this date (I stress that it is Rectory Farm's view that this date has absolutely no meaning or relevance) and yet remain totally overlooked. This in our view must be unsound and should be remedied immediately by NSDC.</p> <p>Rectory Farm considers it has been unfairly and unlawfully omitted from due consideration in this allocations process. I ask that NSDC take the necessary steps to ensure that this matter is now rectified in advance of submitting the next modifications of the SAP to the Inspector for consideration.</p>	<p> NSDC SAP Objection letter 2 16.08.2017 2.pdf (232 KB)</p> <p> NSDC SAP Objection Letter 1 16.08.2017.pdf (245 KB)</p>
17506209//4	Pegasus Planning	<p>The land that is the subject to this letter, in association with adjoining land between the urban edge of Easton in Gordano and the M5 motorway presents a very strong option for addressing the issues highlighted by the Inspector in ID/4.</p>	<p> Site Allocations Plan Further Residential Site Assessments - Land at Plummers Hill Easton-in-Gordano.msg (1.0 MB)</p>

Comment ID	Organisation	Comment	Attached documents
		<p>The site forms a relatively small pocket of land to the west of Pill through to Junction 19 of the M5 motorway. Land directly to the north on the opposite side of the motorway sits beyond the Green Belt designation and is largely land associated with the Dock.</p> <p>The effect of the M5 motorway and the service station at Junction 19 has an effect on the strength of the Green Belt in this location.</p> <p>The land is identified as falling within cell 77a of the West of England Stage 2 Green Belt Assessment (November 2016) and is assessed by the authorities in relation to the 5 Green Belt purposes as set out below:</p> <ol style="list-style-type: none"> 1. Checking the unrestricted sprawl - Limited Contribution <p>Small area of land contained by the built-up area of Eastern in Gordano, motorway and motorway service station, development would therefore not increase the perception of sprawl.</p> <ol style="list-style-type: none"> 2. Preventing neighbouring towns merging into one another – Limited Contribution <p>A small area of land between the port and Eastern in Gordano, this land is separated from the port by the motorway – currently play a limited role in separation given the presence of the motorway service station.</p> <ol style="list-style-type: none"> 3. Assisting in safeguarding the countryside from encroachment – Limited Contribution <p>Large proportion of site given over to motorway service station, some limited agricultural land and woodland. Cut off from wider countryside by the motorway, built development and the A369. Therefore, plays a limited role in assisting the safeguarding the countryside from encroachment.</p> <ol style="list-style-type: none"> 4. Preserving the setting and character of historic towns - No contribution 5. Assisting in urban regeneration, by encouraging the recycling of derelict and 	

Comment ID	Organisation	Comment	Attached documents
		<p>other urban land – Limited Contribution</p> <p>The cell has played a role in checking the unrestricted sprawl of the nearby urban area however the construction of the M5 and the built-up area of Pill has created a more defensible boundary close to the urban area and resulted in a small area of land which is cut off from the wider countryside.</p> <p>Accordingly, it can be said that the Stage 2 Green Belt assessment does not rate the Green Belt in this location very highly.</p> <p>We submit that the land can sustainably address the immediate issues identified by the Inspector in ID/4. It would equally and at the same time address housing needs in the longer term to 2036.</p>	
17506209//1	Pegasus Planning	<p>Our clients land is located to the south of the village of Langford settlement boundary. The proposed site is south of the southern fringe of Langford, which forms part of the settlement of Churchill as defined by the Core Strategy. It is understood that this land has not previously been promoted or assessed by the Council. However, it is now available for development.</p> <p>As the Council is aware our clients have successfully secured consent on land to the west of Says Lane, Langford for 43 dwellings and have a further application pending (17/P/1200/O) for 41 units. This second parcel of land is one of the sites which has been reassessed by the Council as part of the current review. We believe both sites to be suitable for residential development and this third parcel of land would be complimentary to these other sites.</p> <p>Churchill is identified as a Service Village within the settlement hierarchy and as such is a suitable location for residential growth, due in part to the range of services and facilities available within the village. It is acknowledged that this parcel of land is closer to the boundary of the AONB than my client's other land</p>	<p> Site Allocations Plan Further Residential Site Assessments - Land south of Langford Bristol.msg (1.1 MB)</p>

Comment ID	Organisation	Comment	Attached documents
		<p>interests at Churchill. My clients have already began preparatory work for a landscape assessment of the site and this will underpin any future site layout option for the site.</p> <p>The Council has been asked by the Inspector to consider the identification of sufficient land to accommodate 2,500 for allocation, The Inspector in making these recommendations has sought to boost the supply of housing and increase flexibility and choice.</p> <p>We believe that the Council should have undertaken a more thorough assessment and review of opportunities in and around its most sustainable settlements to understand what their capacities might be to accommodate additional development. With the key focus being on identifying the least environmentally sensitive and those which are best related to the adjacent settlements.</p> <p>We believe that a greater strategic overview needs to be taken and from this viewpoint sites such as this offer a credible option to deliver significant proportions of development. Sites like this can be designed in such a way to link into the existing sites and given our client's other land interests at Churchill this can be easily achieved</p> <p>It is important to note that this land is being promoted by our clients who have a developer ready to rake the site forward. The site is therefore available and deliverable within the next 5 years. Our clients have fundamental concerns with regards to the Council's approach to the identification and assessment of necessary additional sites. Whilst these issues have been touched on above we reserve the right to comment on these again when modifications on the SAP are consulted upon later this year. Our site is not within the AONB or Green Belt, is not the subject of any land use designation and is not near any heritage assets. Whilst it is beyond the settlement limit, it is highly suitable for residential development. Accordingly, we believe this site should be considered for allocation.</p>	

Comment ID	Organisation	Comment	Attached documents
17506209//2	Pegasus Planning	<p>An application was made on this site, in outline for up to 24 units, on 5th July 2016. The Council ultimately resolved to refuse the scheme on 23rd February 2017. The scheme was refused, under delegated powers, for two reasons namely that the site is remotely located from the services and facilities within the village and due to the schemes landscape impact. The application is now the subject of an appeal (APP/D0121/W/17/3176151) which will be dealt with via a hearing on 22nd and 23rd November 2017. Our client maintains that the development of this site is in conformity with Policy CS32 of the Core Strategy.</p> <p>We note that landowners and developers were contacted regarding delivery during June. However, we have no record that our client was approach regarding this site. We note that in publishing the schedule on 20th July that only sites within the development management system would be assessed and only sites which are broadly in conformity with the Core Strategy framework would be considered.</p> <p>In the absence of definitive criteria, it is difficult to comment as to why a site did not progress, however we assume this is purely because of our site being the subject of an appeal and as such the Council would not wish to prejudice any decision on that appeal.</p> <p>We would at this point draw attention and similarities between this site and land to the north of Venus Street, which is proposed for allocation. This site was originally not proposed for allocation by officers. However, members resolved to allocate the site despite at the time an application was pending.</p> <p>We would suggest that a consideration as to whether it complies with the Core Strategy would be an evaluation against the strategic policies and nothing more significant than this. This would seem logical as an allocation merely establishes that the principle of development is acceptable and does not consider the detail.</p> <p>Core Strategy</p> <p>The North Somerset Core Strategy identifies a need to deliver a minimum of 20,985 houses by 2026. As is widely recognised the Council has consistently failed to meet its annual delivery targets. The Core strategy through Policy CS14 that Service Villages have an important role to play with a minimum distribution of</p>	<p> Site Allocations Plan Further Residential Site Assessments - Land east of Brinsea Road Congresbury.msg (1.2 MB)</p>

Comment ID	Organisation	Comment	Attached documents
		<p>2,100 dwellings for this category. The policy also identifies that at Service villages there will be “opportunities for small-scale development of an appropriate scale either within or abutting settlement boundaries or through site allocations.” It can be concluded therefore that residential allocations at Service Villages are possible and whether a site is within or outside the settlement boundary is not significant. However, the scale is important as well as other strategic policy issues such as the Green Bet, nature conservation, historic environment and other environmental protection policies.</p> <p>Policy CS32: Service Villages identifies Congresbury as a Service Village. The policy indicates that sites delivering more than 25 units must be brought forward as allocations either through the Local Plan or Neighbourhood Plans. The policy also includes 7 criteria which relates to the design of individual sites.</p> <p>The site in question is located adjacent to the settlement boundary. It is not the subject of any land use designation and is not near any heritage asset. site has been submitted on numerous occasions as part of the various calls for residential land and has the reference number HE14227. The December 2014 assessment considered this site. As part of the assessment no adverse impacts were identified on the surrounding area and the only environmental impacts were loss of greenfield and within a 5km consultation zone. The assessment concluded that the site had potential for a residential use.</p> <p>When the site was reassessed by the Council prior to the consultation on the Publication Version of the SAP in November 2016, the site was not considered suitable for allocation. With the reasoning being that it would have an adverse impact on the landscape and was poorly located. We consider this assessment to be flawed given that the site is no less further away from facilities than sites which have been granted consent or proposed for allocation (e.g. land at Venus Street). Equally, the site is not located within a sensitive landscape location.</p> <p>We consider that this site along with other similar sites on the edges of sustainable settlements such as Congresbury should have been reassessed as part of the Council’s assessment as to how it might successfully achieve allocations for up to 2,500 houses.</p>	

Comment ID	Organisation	Comment	Attached documents		
		<p>It is important to note that this land is being promoted by our clients who are experienced developers who have achieved several permissions within North Somerset during the last three years and are in the process of delivering units on these sites. Accordingly, we can confirm that this site is available and deliverable within the next 5 years.</p> <p>We consider that the Council's selection and re-assessment process considering the clear guidance from the SAP Inspector to be fundamentally flawed. The Council has missed significant opportunities to consider potentially suitable sites and thus will fall significantly short in its efforts to allocate up to 2,500 houses. We suggest that the Council undertakes a more thorough and comprehensive review of available land for residential development.</p> <p>Our site is not within the AONB or Green Belt, is not the subject of any land use designation and is not near any heritage assets. Whilst it is beyond the settlement limit, it is highly suitable for residential development. Accordingly, we believe this site should have been re-considered and should be allocated for development</p>			
14590529//1	Persimmon Homes Severn Valley	<p>This is a joint response to the consultation by North Somerset Council on its response to the Inspector's letter (ID4) of the 26th June 2017, following hearings into the North Somerset Site Allocations Plan.</p> <p>This statement is agreed by</p> <table border="1" data-bbox="528 1107 1749 1289"> <tr> <td data-bbox="528 1107 943 1209"> <p>Name:</p> <p>Paul Davis</p> </td> <td data-bbox="947 1107 1749 1209"> <p>On behalf of:</p> <p>Persimmon Homes</p> </td> </tr> </table>	<p>Name:</p> <p>Paul Davis</p>	<p>On behalf of:</p> <p>Persimmon Homes</p>	
<p>Name:</p> <p>Paul Davis</p>	<p>On behalf of:</p> <p>Persimmon Homes</p>				

Comment ID	Organisation	Comment	Attached documents		
		<table border="1"> <tr> <td data-bbox="521 280 943 395">Name: Robert Wilding</td> <td data-bbox="947 280 1756 395">On behalf of: Gladman Developments Ltd</td> </tr> </table>	Name: Robert Wilding	On behalf of: Gladman Developments Ltd	
Name: Robert Wilding	On behalf of: Gladman Developments Ltd				
		<table border="1"> <tr> <td data-bbox="521 472 943 587">Name: Lucy White</td> <td data-bbox="947 472 1756 587">On behalf of: Redcliffe Homes</td> </tr> </table>	Name: Lucy White	On behalf of: Redcliffe Homes	
Name: Lucy White	On behalf of: Redcliffe Homes				
		<table border="1"> <tr> <td data-bbox="521 654 943 769">Name: Dr Tom Roche</td> <td data-bbox="947 654 1756 769">On behalf of: MacTaggart and Mickel Homes</td> </tr> </table>	Name: Dr Tom Roche	On behalf of: MacTaggart and Mickel Homes	
Name: Dr Tom Roche	On behalf of: MacTaggart and Mickel Homes				
		<table border="1"> <tr> <td data-bbox="521 836 943 951">Name: Jeff Richards</td> <td data-bbox="947 836 1756 951">On behalf of: Taylor Wimpey</td> </tr> </table>	Name: Jeff Richards	On behalf of: Taylor Wimpey	
Name: Jeff Richards	On behalf of: Taylor Wimpey				
		<table border="1"> <tr> <td data-bbox="521 1018 943 1133">Name: Peter Stockall</td> <td data-bbox="947 1018 1756 1133">On behalf of: St Modwen</td> </tr> </table>	Name: Peter Stockall	On behalf of: St Modwen	
Name: Peter Stockall	On behalf of: St Modwen				
		<table border="1"> <tr> <td data-bbox="521 1200 943 1315">Name: Mark Jackson</td> <td data-bbox="947 1200 1756 1315">On behalf of: Gleeson Homes</td> </tr> </table>	Name: Mark Jackson	On behalf of: Gleeson Homes	
Name: Mark Jackson	On behalf of: Gleeson Homes				

Comment ID	Organisation	Comment	Attached documents		
		<table border="1" data-bbox="528 288 1749 469"> <tr> <td data-bbox="528 288 943 395">Name: Jeff Richards</td> <td data-bbox="947 288 1749 395">On behalf of: Edward Ware Homes</td> </tr> </table> <p data-bbox="528 507 860 533">The statement is in two parts:</p> <ol data-bbox="589 571 1666 667" style="list-style-type: none"> <li data-bbox="589 571 1397 596">1. Comments on the Council's overall methodology in document CD2 <li data-bbox="589 603 1666 667">2. Brief comments on site assessments. More detailed comments on sites will be submitted by individual contributors in their own representations. <p data-bbox="528 705 1727 801">The statement is submitted in response to the documents issued for consultation prior to their presentation to the NSC Executive Committee and we will comment further following the decision of the Executive in response to a formal consultation by the Inspector.</p> <p data-bbox="528 839 1738 1008">In submitting these comments, whilst we accept the need to press on with the consultation, necessitating a short consultation period in August which is not ideal, we are nevertheless disappointed and concerned at the time being afforded to the Council to collate and review all the comments between the 21st August and their consideration by Executive on 5th September. Therefore we consider full copies of all comments should be provided to members of the Executive in advance of the meeting.</p> <p data-bbox="528 1046 779 1072">Part 1 – Methodolog</p> <p data-bbox="528 1110 1704 1174">Inspector Burden's letter to the Council (ID4) establishes firm and clear advice to NSC on the approach which needs to be adopted in order to achieve a sound plan.</p> <p data-bbox="528 1212 1738 1340">ID4 reaffirms the verbal advice provided by Inspector Burden to the participants at the Site Allocations Examination. In light of her conclusions that the Sedgefield approach is the correct approach to calculating the 5 year housing land requirement and a 20% buffer must be applied to that requirement, she has found that the Council is unable to demonstrate a 5 year supply of housing and moreover she concludes that</p>	Name: Jeff Richards	On behalf of: Edward Ware Homes	
Name: Jeff Richards	On behalf of: Edward Ware Homes				

Comment ID	Organisation	Comment	Attached documents
		<p><i>“there are sound reasons for considering that there are a number of sites within the SAP which are unlikely to come forward for development in the timescale envisaged by the Council, either within the first five years after adoption of the SAP, or in the remaining period of the CS to 2026.”</i> (Paragraph 13, ID4). Within this context, the Inspector concludes that a 20% non-implementation allowance should be applied to the overall residual housing requirement, and that <i>“a level of up to 2,500 units would...provide more certainty that the 20,985 dwellings required by the CS would be delivered by 2026”</i> (paragraph 20, ID4).</p> <p>At no point in her letter to the Council does the Inspector invite further discussion on the calculation of the additional housing allowance. Indeed, in reply to the Council’s initial response at the Examination that finding sites for an additional 2,500 dwellings would be ‘challenging’, she reaffirmed that the Council should aim to provide them. NSC’s role at this stage is therefore limited to testing the provision of additional allocations and draft proposed modifications to the Plan to achieve the additional site allocations. It is within this context, we comment on the provisions of CD2.</p> <p>Paragraphs 1 and 2 of CD2 broadly agree with the Inspector’s assessment of what is required. However in paragraph 7 the Council expresses concerns regarding the derivation of the additional housing requirement and revisits the calculation of the additional site allocations allowance reopening the examination debate and the Inspector’s findings (ID4). That approach is fundamentally wrong. It is our collective view that:</p> <ul style="list-style-type: none"> - option (a) is not an appropriate basis for calculating the allowance for additional site allocations, - option (c) is wrong because it assumes the 5,665 is guaranteed and can be treated in same way as completions and - (d) relates to 5 year supply only. <p>Therefore the only realistic and appropriate option is (b). The Inspector is absolutely clear in paragraphs 2, 3, 20, 22 and 27 of her letter to the Council (ID4) that the figure to be tested is up to 2,500. This is necessary to achieve a flexible supply capable of delivering the adopted housing requirement of 20,985 over the plan period, which itself is not based on an up to date OAN and is not NPPF compliant.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>In testing the 2,500 figure, the Council must not fall into the trap of only considering sites which are broadly consistent with the Core Strategy. This might rule out sites in the development pipeline which are nevertheless deliverable. The Inspector also made it clear during the Examination that it would be necessary to revisit the strategic gaps designated in the emerging SAP. The assessment should identify all sites within the development pipeline and carry out a balancing exercise to assess deliverability against policy. This should take account of the Inspector's comments in paragraphs 23 and 26 of ID4. In addition paragraph 23 of ID4 says CS14 does <i>'not constitute a straight jacket to be achieved'</i>, but is a <i>'broad distribution of new dwellings'</i> and further says sites which are broadly consistent with the CS spatial strategy is a <i>'starting point'</i>.</p> <p>Furthermore, the Council has not assessed those omission sites which are in accordance with the Core Strategy simply on the basis they are not currently in the 'development pipeline' which is contrary to paragraph 24 of the Inspector's letter. Omission sites should not be dismissed at this stage simply on the basis they have not met the Council's threshold for being in the 'development pipeline'. We note the sites now being assessed include those with recent EIA screening requests or pre application 'discussions' (rather than formal pre application submission). It could be argued that omission sites which have been promoted through the correct channels over a significant period of time have a greater evidence base demonstrating deliverability and will be ready for application submission ahead of some of these sites now being assessed. There are also omission sites at appeal which are considered to be in accordance with the Core Strategy, but have again been dismissed as they are not current applications. This is despite there being a clear evidence base on their deliverability, with reasons for refusal being primarily based on the Council's consideration at the time that it could demonstrate a five year supply, which is clearly no longer the case.</p> <p>Despite offers from the development industry and the Inspector's recommendation (para.25 of ID4 <i>'Developers who wish to promote omission sites may assist the Council through the preparation of a delivery trajectory for those sites'</i>) to provide deliverability information on these omission sites, the Council has not been willing to accept submissions. We would note given the low threshold that it would be a simple exercise for most promoters to undertake the work to facilitate these sites into the 'development pipeline'. The Council has therefore fundamentally failed to <i>'to work closely with the development</i></p>	

Comment ID	Organisation	Comment	Attached documents
		<p><i>industry,</i> ' as recommended by the Inspector in paragraph 25 of ID4, to truly understand the position of the omission sites.</p> <p>By not properly testing all potential sites and, in particular all sites which are in the development pipeline, the Council have underestimated the potential supply. Looking at the sites in Part 1 of CD2a and assuming the 27 sites are in the figures, there are 9,221 units on remaining sites in 4 categories. Further accepting the removal of green belt sites (7,760), taking account of the Congresbury appeal being dismissed (80) (2nd application was approved and included in the Council's five year housing land supply statement), double counting of the Cox's Green application (28), the 'Land north of Chestnut Drive, Claverham' application (85) being withdrawn, that leaves 1,268 units on non green belt sites which should be included in any assessment. Adding this 1,268 to the 1,812 units the Council have identified (CD2a Part 2) produces a total of 3,080 which if discounted by 20% gives a total of 2,464.</p> <p>Setting aside Green Belt sites, the process by which sites have been selected as being broadly in conformity with the Core Strategy (and therefore included in Part 2 for further assessment), or deemed to be contrary to the Core Strategy framework (and therefore consigned to Part 1 and not subject to further assessment) is neither transparent nor robust. For example,</p> <p>all non-PDL 'countryside' sites are consigned to Part 1. However, many Part 2 sites are 'greenfield' and 'countryside' to the extent that they are outside settlement boundaries as currently defined, but are included in Part 2 because they are categorised as 'town' or 'village extension' rather than 'countryside'.</p> <p>In addition, had a sound review of the settlement boundaries (to include existing developments) been undertaken then some of the omission sites may now be adjacent rather than detached from the settlement boundaries.</p> <p>Moreover, some sites that were previously identified (in ED36) as being in conformity with the Core Strategy framework and therefore to be considered further, are now excluded from further consideration on the basis that they are now considered not to be in conformity with the Core Strategy framework. Given</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>that the Core Strategy framework has not changed in the interim it is difficult to comprehend the justification for this reassignment.</p> <p>The categorisation of sites in CD2a as ‘town’, ‘village extension’ and ‘countryside’, and indeed the reassignment of some sites to a different category from that to which they were assigned in ED36, is therefore arbitrary, lacking in transparency and unjustified by evidence. Given the importance in the Council’s approach of a site’s categorisation to whether it is taken forward for further consideration under Part 2, or rejected as a potential development opportunity at the Part 1 stage, this is a significant flaw in the site selection process. It is therefore imperative that all non-Green Belt sites in the development pipeline are properly considered, and not rejected on the basis of an arbitrary and non-transparent process of categorisation that is neither supported by evidence nor justified.</p> <p>CD2 paragraph 12 uses the previous Statement of Common Ground regarding agreed deliverable supply to justify that only 3,859 units are disputed and that any discount should only be applied to this figure. This is wrong. Any dwelling not actually completed and already delivered may not come forward for a variety of reasons. The sites agreed in the SoCG for the purpose of assessing a 5 year housing land supply are units that SHOULD be delivered not WILL be delivered. The purpose of applying a non-implementation rate is to make an allowance for any units not yet completed and not coming forward.</p> <p>The Inspector has asked the Council to test the allocation of additional sites to accommodate up to 2,500 units. This test is important because the Inspector needs evidence of the implications of providing sites for an additional 2,500 units, which are required to meet the level of need identified in evidence. The qualification of the number by the words ‘up to’ provides flexibility when determining the results of the test. However it does not provide a justification for reducing the requirement to as low as 386 from the outset as the Council does in CD2 paragraph 15. The need is circa 2,500 not 386.</p> <p>CD2 is critical of DCLG and LPEG sources for determining the discount. However:</p> <p>The DCLG table is from a slide presentation by DCLG Director of Planning Ruth Stanier at the September 2015 HBF Conference, based on original DCLG research from an analysis of published Glenigan data on</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>planning applications and permissions. It has been presented in evidence by HBF to a number of plan examinations and, for example when submitted in representations on the Plymouth and South West Devon Plan was accepted by the Councils and included in their own evidence to justify the contingency in their Housing Land Supply.</p> <p>The DCLG slide shows that whilst the number of homes being granted planning permissions and in the planning pipeline has been increasing in recent years, there has been a 30%-40% gap between permissions and housing starts, as well as the finding that 10%-20% of permissions are '<i>dropping out</i>'.</p> <p>The Council argue that a non-implementation rate in the DCLG research relates to permissions and should not be applied to allocations. However this suggests the discount should be higher as it is likely non-implementation of allocations will be higher than permissions.</p> <p>In response to LPEG, the Council say the issue is about boosting medium to long-term supply and so is irrelevant. However, this uplift is necessary to compensate for the over optimism of the Council's trajectory and provide greater certainty of a 5 year housing land supply in the future. This can be achieved by the same 20% uplift, providing that sites with an early prospect of delivery are allocated (or permitted) to provide this 20% uplift.</p> <p>CD2 says the specific LPEG recommendation has not been taken forward in the Housing White Paper. However, what the White Paper does include is a whole raft of measures to increase delivery including a housing delivery test which specifically refers to a 20% buffer on 5 year housing land supply if delivery falls below 85% of the requirement, which it already does in North Somerset.</p> <p>The Inspector has recognised that further sites should be allocated in the SAP to secure delivery over the remainder of the CS period (paragraph 19 of ID4) and that sites allocated in the SAP may contribute towards supply required for the new Local Plan. Notwithstanding the Council's view that constraints make it difficult to find sufficient sites, new allocations will be needed next time as the proposed JSP strategic sites (if allocated) will not on their own meet likely North Somerset housing needs and due to the infrastructure requirements may present similar delivery issues to the current ones.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>The Council identifies that a different approach was taken by the Inspector in the BANES Place-making Plan Examination and suggests the same approach should be adopted in North Somerset for consistency. However, each plan is different due to the particular circumstances that apply at the time within the specific plan area. Firstly, the shortfall in BANES is specifically in Bath at the end of the plan period rather than a lack of delivery which needs to be addressed in the first 5 years. In addition the plan identifies safeguarded land at Keynsham, which whilst only to be released as part of a Local Plan Review, does provide a release valve given a review is intended in 2018. Not only that, there is a clear difference between the BANES examination, where the Inspector did not examine 5 year housing land supply in detail and the SAP, where the Inspector did, which highlighted the delivery problems which the Council now have to address.</p> <p>The Inspector says at paragraph 25 of ID4 the aim should be to increase the likelihood of delivery through a wider choice of sites. We agree:</p> <p>It is not just about identifying new sites but working harder to ensure existing sites come forward quicker and work to reduce the time taken to determine applications at all stages, including outline, reserve matters and discharge of conditions.</p> <p>In allocating more sites the Council should seek to maximise housing supply from the widest possible range of sites by size and market location so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. A wider variety of sites in the widest possible range and locations also ensures all types of house builder have access to suitable land and this in turn increases housing delivery. In addition the Housing White Paper emphasises that a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p>	
14590529//2	Persimmon Homes Severn Valley	<p>Part 2 – Individual Site Assessments Comments</p> <p>The following sets out general comments in relation to specific sites where agreed by all contributors. More detailed comments will be included in individual responses.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>The Council has only produced site assessments for those sites which are on the Part 2 list, but we consider that the Council should widen its net to include sites in Part 1 which are in the development pipeline. Accordingly, the Council should publish site assessments for these sites and liaise with the development industry regarding their delivery rates if these are not already known.</p> <p>However in terms of the deliverability of sites, again the Inspector was clear that the majority of the new sites identified should be deliverable within the 5 years but this does not need to be case for all sites, providing they are delivered by 2026. However it is then important that the majority of sites are deliverable in 5 years.</p> <p>Only 9 sites are recorded to be in control of a housebuilder (answers to Q2 on the deliverability forms) and this also includes a number of options which would need to be exercised before the sites could be delivered. We also note there are very few volume housebuilder interests in this list:</p> <ul style="list-style-type: none"> • Strongvox (Wilsons Gardens WSM) • Anchor retirement (Harbour Rd Portishead) • MacTaggart & Mickel (Nailsea) • McCarthy & Stone/Yourlife Extra Care (173 Kenn Rd, Clevedon – subject to planning contract) • Freemantle (Cadbury Garden – option) • St Congar Community Co Housing Ltd (St Andrews Congresbury) • Vowles Parks Ltd (Coombe and Shipham sites x2 Winscombe – but note park home developer) • Redcliffe Homes (Cox’s Green, Wrington) • There are a number of apartments and smaller retirement products (and hence higher densities which potentially inflate numbers) especially in Portishead (in particular, two sites in Harbour Road include 94 apartments with planning permission and 93 sheltered units proposed by Anchor Living) and Clevedon (173 Kenn Rd site for 60 retirement homes (proposed by McCarthy & Stone/Yourlife Extra Care), together with 21 apartments from a conversion of Waverley House), which will impact on wider provisions for family and affordable dwellings We also note a that number of the assessments raise viability issues. 	

Comment ID	Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • The assessments and the Sustainability Assessments do not always tally (eg. All Saints Lane Clevedon the notes say that it abuts the listed grounds of Clevedon Court with a potential to impact on the setting but SA4 rates the site green - not close to any heritage assets.) <p>Sites that are so constrained at this stage (as confirmed by the Council in its constraints sections of the assessments) that they should be deleted from Part 2, as identified in the following section</p>	
14590529//30	Persimmon Homes Severn Valley	<p>Persimmon Homes Severn Valley (PHSV) support the joint statement submitted on behalf of a number of developers. From that we emphasise the following general principles:</p> <ul style="list-style-type: none"> • The Inspector has provided clear advice that housing land supply should be assessed on the basis of the Sedgefield approach, with a 20% non implementation allowance. • The Council's role at this stage is to test the requirement for an additional 2,500 dwellings to provide certainty and build in flexibility. • It is not appropriate to reopen the Examination debate. • We do not consider the Council has addressed site/units unlikely to come forward within the existing SAP allocations. • Consistency with the Core Strategy (CS) is only a starting point (ID4 paragraph 23) • Omission sites that are in accordance with the CS but not in the development pipeline have not been assessed and neither have all other potential sites in the development pipeline been assessed. • Interpretation of whether or not sites are broadly in conformity with the CS is not transparent or robust. • The 20% discount should apply to all units not completed and should not be discounted further. • The provenance for the 20% is robust and supported by evidence. • Any new allocations that do not come forward in the short term will in any case help to meet JSP requirements. • Current circumstances in North Somerset are different to those in the BANES Examination. • There is a need to identify a wider range of sites including more to deliver existing allocations. 	

Comment ID	Organisation	Comment	Attached documents
		<p data-bbox="589 320 864 347">1. <u>Comments on Sites</u></p> <p data-bbox="521 456 1733 616">2.1 PHSV consider there are 2 major flaws in the Council’s site assessments. Firstly a number of sites in the CD2a Part 2 list are more constrained and less likely to come forward than other sites in the development pipeline and omission sites. Secondly, that is made worse by the very limited list of sites the Council has tested despite, identifying others in Part 1 of the schedule having potential, which have not been assessed</p> <p data-bbox="589 655 931 683">1. <u>Farleigh Fields Backwell</u></p> <p data-bbox="521 722 1749 855">3.1 Our first concern relates to the treatment of Farleigh Fields, Backwell. Whilst the site (together with 4 others) is at appeal and awaiting a decision, that does not mean the site could not be assessed and allocated in the SAP. This is demonstrated by land at Cox’s Green, Wrington, which is included as a site at appeal in CD2a Part 1, but a smaller site is also included in Part 2. and assessed for lower numbers.</p> <p data-bbox="521 890 1744 1054">3.2 Farleigh Fields is owned by PHSV, all the recognised constraints have been resolved through the planning application and appeal process (including a Section 106 Agreement) so a Reserved Matters application for a first phase could be submitted quickly. In comparison there are other sites assessed by the Council with far less certainty of delivery, given the need to demonstrate delivery is a key requirement throughout the Inspector’s letter.</p> <p data-bbox="521 1094 1749 1294">3.3 There are 7 sites which have been assessed with no delivery profile, either because there has been no response from landowners or agents or because the response cannot confirm delivery. These are Dauncey’s Hotel (10 units), Queensway/Midhaven Rise (35), Waverley House (21), Lower Bristol Road 916), South of Cadbury Garden Centre (21), Sweeting and Son, Sandford (16) and Winford Garden Centre (11). Whilst these only total 130 units, significantly they are on smaller site where delivery should be more certain and they are important for the supply of sites for smaller builders.</p>	


Comment ID	Organisation	Comment	Attached documents
		<p>3.4 There are 2 issues regarding the interpretation of ‘broadly consistent’ with the CS. There are 5 sites which involve the loss of employment land, including land currently in active employment use. These are Harbour Road/Gordano Gate, Portishead (93), Harbour Road/Serbert Road, Portishead (93), 173 Kenn Road, Clevedon (60), Old Mill Road, Portishead (350) and Wyndham Way, Portishead (35). These generally are larger sites and total 631 units but their development for residential or substantially residential use conflicts with CS policies CS20 and CS31 and the submitted SAP employment policies. In other words these sites are considered acceptable, even though on any reasonable interpretation, they are not ‘broadly consistent’ with the CS. Therefore this interpretation could and should be applied to other sites.</p> <p>3.5 There are then a series of sites, which whilst they exceed the indicative CS scale for development outside settlement boundaries, having been included are clearly considered by the Council to be ‘broadly consistent’ with the CS. However one exception is Youngwood Lane, Nailsea which proposes 450 dwellings against the policy guidance of 50 in CS32. That is 9 times the policy limit. In comparison, 220 dwellings at Farleigh Fields would be a similar 8.8 times the CS32 figure of 25 dwellings. We agree that the scale of provision proposed at Youngwood Lane is necessary to deliver the CS housing numbers but that the principle needs to be applied more widely to release more sites like Farleigh Fields, where as recognised by the Inspector (ID4 paragraph 19) and like Youngwood Lane, the scale of schemes is restricted and without the benefit of a positive allocation in the SAP the negotiation of planning permission could delay delivery.</p> <p>3.6 The Inspector commented that the Council’s assumed rate of delivery in their housing trajectory is optimistic so that their 5 year supply is unlikely to be delivered (ID4 paragraph 13). It is important that the Council avoid making the same mistake in considering the additional sites. However, the delivery information provided by the developers seems to have been accepted without question and we consider this results in unrealistic assumptions on a number of sites, in particular an excessive number of units in the first year of production and an excessive delivery per annum on flatted developments.</p> <p>3.7 We also note that the Part 2 list includes sites with C2 units and Park Homes, which have not previously been include in the Councils’ 5 year housing land supply and therefore should be discounted.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p data-bbox="521 323 819 352"><u>Details of Farleigh Fields</u></p> <p data-bbox="521 387 1756 451">3.8 In addition to the issues set out above and the need to apply general principles consistently, there are a number of reasons why it is appropriate to allocate Farleigh Fields in the SAP, as follows:</p> <ul data-bbox="600 491 1756 651" style="list-style-type: none"> <li data-bbox="600 491 1756 555">• The principle of residential development at Backwell accords with the Spatial Strategy of the Development Plan <li data-bbox="600 587 1756 651">• Policy CS32 supports additional housing at the Service Villages which enhances the sustainability of the settlement. <p data-bbox="521 691 1756 754">- Backwell is identified as a Service Village and the Council accept that it is a suitable and sustainable location for residential development.</p> <ul data-bbox="600 794 1756 1361" style="list-style-type: none"> <li data-bbox="600 794 1756 890">• The Backwell Neighbourhood Plan does not allocate any housing sites at Backwell but does support housing development that would be of a scale which is appropriate to the size and character of the settlement. <li data-bbox="600 922 1756 954">• The NP does not restrict housing to allocated sites or to sites within the settlement boundary <li data-bbox="600 986 1756 1050">• The emerging JSP indicates the need for additional housing at North Somerset and identifies Backwell/Nailsea as a potential location for a further 3,600 dwellings <li data-bbox="600 1082 1756 1145">• Additional housing at Backwell would accord with the adopted and emerging spatial strategy for the area. <li data-bbox="600 1177 1756 1241">• The LPA identifies Backwell as the most sustainable Service Village beyond the main towns in North Somerset. <li data-bbox="600 1273 1756 1361">• Residents have a choice of sustainable transport modes including walking and cycling and public transport (with access to a mainline Railway Station and frequent bus services 	

Comment ID	Organisation	Comment	Attached documents
		<p>- By allocating only 3% of the Service Village housing requirement to Backwell the emerging Site Allocations Plan fails to take the opportunity to focus more development at the most sustainable Service Village.- The scale of development is appropriate at Backwell.- 220 homes at Backwell only equates to 10.4% of the overall Policy CS14 dwelling requirement for Service Villages (2,100) and 11.6% growth in the village. It has no material implications for the Spatial Strategy, is not disproportionate and would still represent lower levels of growth than planned at other less sustainable villages.</p> <ul style="list-style-type: none"> • In accordance with the Council’s assessment of other sites, allocation would not be inappropriate because the site lies outside the settlement boundary as Policies CS14 and CS32 require such sites to be brought forward as Site Allocations • the unique nature of the site, surrounded by development on all sides such that it is essentially infill development rather than a new incursion into open countryside • It is essential that suitable unallocated sites outside settlement boundaries be allowed to come forward immediately and without further delay <p>3.9 In addition the Council have previously considered the allocation of Farleigh Fields. The North Somerset Executive considered the submission draft of the SAP on 2nd February 2016, when the original Committee documents did not propose to allocate Farleigh Fields, confirmed its existing status as outside the development boundary, but identified Local Green Space on the same area originally proposed as such in the neighbourhood plan. This effectively left 2 areas of ‘white land’. However, the Executive Committee deleted a proposed site at Oldmixon and replaced it with Farleigh Fields, with the Local Green Space retained, effectively as in the planning application.</p> <p>3.10 The Executive Committee decision was called in by the SPED Scrutiny Panel who on the 23rd February referred the decision back to the Executive, who on 24th February resolved that ‘The Consultation draft Sites and Policies Plan Part II: Site Allocations be approved for public consultation but</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>with the exclusion of both the land north of Oldmixon Road, Weston-super-Mare (Hutton Parish) and the land at Farleigh Fields, Backwell from the list of sites allocated for new housing.’</p> <p>3.11 We note a planning application on the Oldmixon site was subsequently allowed on appeal for 150 dwellings.</p> <p>3.12 Farleigh Fields is a deliverable site in the development pipeline. As such we completed a delivery profile form when the Council consulted with landowners of sites they have assessed. This was an attempt to work with the Council as the Inspector urged in ID4 paragraph 25. It is therefore disappointing that there has been no response from the Council</p> <p>3.13 PHSV also control 3 allocated sites where delivery has been delayed and we comment on those as follows.</p> <p style="padding-left: 40px;">1. <u>Moor Road, Yatton</u></p> <p>4.1 Schedule 1 of the SAP identifies a number of constraints on this site relating to heritage, ecology, surface water drainage and highways, which have all been resolved in the course of progressing the submitted planning application, 16/P/0888/F. The one remaining constraint is the replacement/relocation of rugby playing pitches, which is subject to a Sport England objection. In determining the application the Council will need to take a view on this in the light of a replacement provided by the rugby club themselves and the need to consider the SE objection against the urgent need to boost the supply of housing in assessing the planning balance. The application is a full application which would allow early delivery, which is a key consideration as only 6 of the Part 2 sites are full applications, together with 1 full matters application, but a further 13 sites are only at pre-application or EIA stage and unlikely to deliver units for some time.</p> <p style="padding-left: 40px;">1. <u>Land to the West of Winterstoke Road, Weston-super-Mare</u></p>	

Comment ID	Organisation	Comment	Attached documents
		<p>5.1 Similarly to Moor Lane there is a playing field issue related to this site and Schedule 1 of the SAP says ‘loss of sports pitch needs to be address.’ Again a solution is available as the use of the former poor quality grass pitch with no changing facilities is being transferred to a new 3G pitch at the adjoining Weston-super-Mare FC stadium, in addition to the main stadium grass pitch. Despite protracted discussions, Sport England have made it clear they will continue to object in principle to the loss of a grass pitch. When the planning application is submitted the Council will again need to make a similar judgement to that required at Moor Road when considering the planning balance. However, in the light of the Council including another site at Midhaven Rise in CD2a Part 2, also requiring the replacement of a football pitch, we assume it is a judgement that the Council are willing to make.</p> <p>1. <u>Phase 2 Winterstoke Village</u></p> <p>6.1 Planning application 12/P/1510/OT2 for the second phase of Winterstoke Village was registered on 13th September 2012 and remains undetermined for a number of reasons. PHSV has been working with the Council through a series of regular meetings to resolve all the issues. However as all of Phase 1 is either built or consented, the resolution of this application is now a matter urgency if continuity of delivery is to be maintained. One issue still to be resolved relates to the calculation of jobs to meet CS policies requiring a job-led approach. The issues raised by the Inspector in ID4 paragraph 15 are very real and if not resolved on this application could act as a further constraint on delivery both here and more widely at Weston Villages. As with the replacement playing field issues it is likely that the Council will need to make a judgement.</p> <p>1. <u>Conclusion</u></p> <p>7.1 The Council’s approach does not demonstrate a commitment to boost significantly the supply of housing in accordance with the Inspector’s determination of the need for a 20% buffer. The buffer of supply will help to ensure there is a realistic prospect of achieving the planned levels of housing development by offering flexibility of supply, helping to ensure there is choice and competition in the</p>	


Comment ID	Organisation	Comment	Attached documents
		<p>market for land and deliver the national policy requirement to boost significantly the supply of housing. The buffer also helps to address the concerns of the Inspector that some sites may not come forward as anticipated in whole or in part in the light of the Council's optimistic assumptions in the trajectory and the time it takes to deal with planning applications, together with any other unpredictable events.</p>	
5752225//1	GVA Grimley	<p>Former Moss Land, West of Locking Parklands (Lock3/SAP7)</p> <ul style="list-style-type: none"> • This site is in accordance with the Core Strategy i.e the site is situated adjacent to the settlement boundary of a major settlement, so could already be considered under existing policy which allows limited development in these locations. • The site should not be discounted on the basis of the Strategic Gap designation given the findings of the Inspector at the hearing session on this matter requiring the Council to revisit these designations, and explicitly stating that she would not expect sites to be discounted from a review on this basis. • The site can be delivered with the adjoining developments of Locking Parklands and the remainder of the Moss land within the existing allocation which are providing the required infrastructure to allow this land to come forward. The land can start to make a contribution within the 5 year period as the adjacent allocated land is expected to start on site in 2018. • An EIA Screening request 17/P/1800/EIA1 has been submitted for this land to the Council in July 2017 so this site is now in the 'Development Pipeline'. A copy is appended to this letter (appendix 3). • There are no known technical constraints as to why this site cannot come forward, the flood plain designation which does affect part of the site can be addressed through the drainage strategy for the remaining sites Weston Villages some of which also fall within the same designation. 	<p> GVA St Modwen Comments NSC Additional Sites FINAL 18-08-17 COMPLETE lr.pdf (5.5 MB)</p>

Comment ID	Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • The site clearly performs significantly better than the site now being assessed by the Council to the East of Locking Parklands and West of the M5 for reasons outlined in the Development Industry response. The same can be said for the assessment land at Station Road, St Georges. <p>We therefore respectfully request that the above mentioned sites are considered as part of the current assessment exercise and we would of course be happy to assist in providing any further information that will assist in this process.</p> <p>Land West of Kenn Road, Clevedon (Clev 2/HE14174)</p> <ul style="list-style-type: none"> • The site is in the ‘Development Pipeline’ and the current planning application, which was submitted in July 2016, has now been supplemented with updated drainage and acoustic strategies (July 2017) which robustly demonstrate that all technical issues are now resolved and a residential led mixed use site is truly deliverable. The site is also deliverable within 5 years and will be built out by the site owner St Modwen (which includes St Modwen Homes). A copy of the latest submitted parameters plan (July 2017) and Design and Access Statement is appended to this letter (appendix 1) to further demonstrate the deliverability of the site proposals under current application 16/P/1901/O. • A development trajectory form was filled in by GVA as requested by the Council following the hearings but this has not been published in the current suite of documents, nor is there any evidence of any assessment of the findings. I therefore enclose the form for the benefit of the Inspector (appendix 2). • The site is not deliverable for employment uses as fully justified in the planning application submission and submissions to the SAP. The Council has continually failed to engage with the owners throughout the SAP and application process to gain an understanding of this issue which is contrary to national guidance and the Inspector’s recommendations (ID4 para. 25). • The Council has not produced (either during the application or through the SAP process) any sound evidence to justify the retention of the site for employment uses or provided any analysis of the detailed 	


Comment ID	Organisation	Comment	Attached documents
		<p>marketing evidence provided within the Economic Statement that supports the application (and summarised in our SAP submissions).</p> <ul style="list-style-type: none"> • The Council’s evidence (ED41) produced after the hearings (as requested by the Inspector) further confirms the position presented by GVA and St Modwen that there is not sufficient demand to bring the site forward for employment development. Document ED41d is a record of commercial enquiries that the Council has received and referred to this specific site. The records shows that the Council have only referred 5 different occupier enquires in the last 9.5 years, the most recent of which was over 5 years ago in March 2013. Even with these enquiries, for reasons as set out within the application and submissions to the SAP, the site could still not come forward given the scale of these enquiries. • The application proposals are mixed use and will deliver 3 acres of employment land and we are seeking an allocation on this basis. This is the only way of securing employment provision on this site. • If the Council has genuine concerns regarding retaining employment sites within the District then this is completely undermined by the current list of assessment sites which includes those already in active employment use. In particular we do not understand the logic of considering the sites at 173 Kenn Road (60-75 units), Clevedon, and Mill Road, Portishead (350 units) for residential use as they comprise existing occupied employment buildings including tenants who do not wish to relocate (indeed it appears at Mill Road that no alternative provision has been found for them). Furthermore, even if these sites did come forward this is not likely in the short term. • The site adjoins one of the largest existing employment sites in the District; has planning permission for employment development; and is proposed to be allocated for employment in the SAP. Therefore, to now consider the site as ‘countryside’ and therefore contrary to the Core Strategy on grounds of sustainability is completely contradictory to the Council’s approach to the site to date accepting development in this location as being sustainable. • Furthermore the fact the Council has not extended the development boundary of Clevedon to accommodate the existing or proposed employment sites is a unique proposition within the District. Had a 	



Comment ID	Organisation	Comment	Attached documents
		<p>robust review of the boundaries taken place then the site would either be adjacent or within the settlement boundary and therefore meet the Council’s criteria for assessment.</p> <ul style="list-style-type: none"> • The position remains that one of the District’s major settlements identified for significant growth still has no major proposed residential allocations which will deliver the required growth and any meaningful contribution to family dwellings and affordable housing, noting the schemes being proposed in the SAP appear to be retirement, care or apartment schemes 	
4193569//6	Portishead Town Council	<p>Portishead Town Council has carefully considered the Further Sites Assessments of the Sites Allocations Plan and wishes to make the following comments:</p> <p>We do not consider that there has been strategic planning in relation to the Further Sites Assessments: it is our opinion that sites delivering less than 1000 dwellings cannot be described as strategic.</p> <p>We object in the strongest possible terms to the description “Part 2 sites broadly in conformity with the Core Strategy framework which will be assessed”. The proposed Portishead sites are certainly not in conformity with the Core Strategy. They are designated for the provision of employment as stated in the Local Development Plan and the Core Strategy that aims to ensure that towns such as Portishead develop sources of employment for local residents.</p>	

Comment ID	Organisation	Comment	Attached documents
		<p>In all the site assessments related to Portishead it is stated that “Sub-objective 5.4 Achieve reasonable access to sustainable transportation proximity of site to railway station Amber Nearest rail station is between 2 and 5 km”. This is patently untrue as there is yet to be a railway station in Portishead and it is currently more than 10kms to nearest existing station at Nailsea & Backwell.</p> <p>Again in all the site assessments related to Portishead it is stated that “Sub-objective 2.2 Achieve reasonable access to a full range of educational facilities – primary education Assessment Using information from ‘Pupil Projections from North Somerset Schools 2015-2019’ Amber Primary school within settlement with limited capacity”. This is also untrue as demonstrated by the fact that 8 reception age children will begin their life at primary school in Portbury because there is no capacity for them in Portishead. This will be exacerbated by the now approved building of 94 flats at Serbert Way with a projection of an additional 21 primary places required. In effect this is one new primary school class.</p> <p>Again “Sub-objective 2.3 Achieve reasonable access to a full range of educational facilities – secondary education Assessment Using information from ‘Pupil Projections from North Somerset Schools 2015 -2019’ Green Secondary school within settlement”. There is a secondary school but the criteria fail to recognise that this school is bursting at the seams, yet again exceeding its PAL for entry in September 2017 and expecting to have a total of 2,200 students in 2018.</p> <p>With specific regard to Old Mill Road, this is an existing area of significant and thriving employment for Portishead: it provides a breadth and depth of jobs at all levels for local residents irrespective of any arbitrary planning use classes. Portishead has very little other land available for such a range of employment opportunities so it is crucial for its future sustainability that Old Mill Road continues to support all the businesses currently there.</p> <p>Other suggested sites are designated for employment but are not currently in use as such. Of those listed only one matches with its planning application number ie 17/P/1229/F; those identified as Harbour Road Gordano Gate Employment allocation, Harbour Road Serbert Way and Site V2 Harbour Road either do not have the correct planning application number or it does not exist on the web site so we are unable to view</p>	


Comment ID	Organisation	Comment	Attached documents
		<p>the planning content of these. Excluding Old Mill Road these sites plan a total of 231 dwellings again with significant impact on the infrastructure of Portishead.</p> <p>Old Mill Road has considerable value to the town in terms of its economy and ongoing vibrancy which we cannot afford to lose.</p> <p>It is our view that any change to the employment character of Old Mill Road would have a detrimental effect on the town: the proposal of 350 dwellings as part of a mixed use scheme would significantly impact on traffic flows within the town; the types of jobs offered are low level, part time and poorly paid for the most part, and completely inadequate as compared to jobs lost from the existing employment offer; all our schools are full to overflowing; and our medical centres are overstretched due to their inability to recruit sufficient medical staff.</p> <p>Portishead Town Council writes to object strongly to the inclusion of 350 dwellings at Old Mill Road as being “broadly in conformity with the Core Strategy framework”. We call upon the Executive Member responsible for this document to withdraw any reference to this number of dwellings on land allocated for employment. As a town that has absorbed so much development over recent years with little extra employment we cannot afford to lose any site with existing employment.</p>	
17400353//1	Pegasus Planning	<p>The land that is the subject to this letter, in association with adjoining land between the urban edge of Bristol and the South Bristol Link present a very strong option for addressing the issues highlighted by the Inspector in ID/4.</p> <p>Aside from the playing field between Elsbert Drive and Rose Meare Garden’s the undeveloped area between the South Bristol Ring Road and Highridge Green, within which the subject land sits, is within the Green Belt. The effect of the new South Bristol Ring Road has an effect on the strength of the Green Belt in this location.</p>	 P17-1777 NSC RW.PDF (2.0 MB)



Comment ID	Organisation	Comment	Attached documents
		<p>The land is identified as falling within cell 59b of the West of England Stage 2 Green Belt Assessment (November 2016) and is assessed by the authorities in relation to the 5 Green Belt purposes as set out below:</p> <ol style="list-style-type: none"> 1. Checking the unrestricted sprawl of Bristol - Limited Contribution Small area of farmland and recreation use between the urban edge of Bristol and the newly constructed South Bristol Link (SBL). New road forms a strong physical boundary feature 100-300m from the urban boundary which encloses the cell. 2. Preventing neighbouring towns merging into one another - No contribution 3. Assisting in safeguarding the countryside from encroachment – Limited Contribution <p>The cell comprises mainly agricultural land immediately adjacent to the urban area. It is affected by the route of the South Bristol link which limits its connectivity with the wider countryside</p> <ol style="list-style-type: none"> 4. Preserving the setting and character of historic towns - No contribution 5. Assisting in urban regeneration, by encouraging the recycling of derelict and other urban land – Limited Contribution <p>The cell has played a role in checking the unrestricted sprawl of the nearby urban area however the construction of the SBL has created a more defensible boundary close to the urban area and resulted in a small area of land which is cut off from the wider countryside. Accordingly, it can be said that the Stage 2 Green Belt assessment does not rate the Green Belt in this location very highly.</p> <p>We submit that the land can sustainably address the immediate issues identified by the Inspector in ID/4. It would equally and at the same time address housing needs in the longer term to 2036.</p>	

Comment ID	Organisation	Comment	Attached documents
17400353//2	Pegasus Planning	<p>Yatton Rugby Club is not on the list of 28 sites being considered, despite being a site that is broadly consistent with the spatial strategy of the Core Strategy. However, neither is it listed as a site that will not be the subject of further assessment. We submit there it is a valid site to assess within the current phase of the examination the SAP. As the site has been known to the Council since our letter of representation of April 2016, there is no justification for the Council being silent on the assessment of this land.</p> <p>The 28 site assessments do not reveal a definitive officer view on several sites. However, it is clear is that the assessment raise significant concerns regarding several of the larger options that are considered (e.g. Land north of Youngwood Lane, Nailsea and Land west of the M5, Locking Parklands).</p> <p>We do not comment at this stage on the individual assessments as formal consultation on proposed modifications will follow after 5th September. However, we are concerned that the Council’s review has been constrained by the options it has assessed and therefore that it has overlooked sustainable development opportunities by taking too narrow view on the sites to be assessed. Yatton Rugby Football Club should have been assessed for its sustainable development potential in the context of generating flexibility in housing land supply to 2026.</p> <p>The Club currently hosts fifteen different teams and plays an important role in the local community. Historically it has operated from pitches both on the land that is the subject of this letter, for which the club control the freehold and from playing fields to the west, where the club’s lease is ending.</p> <p>The land to the west, known as ‘Land at Moor Road’ is proposed for allocation in the Publication SAP, with a capacity estimate of 60 dwellings. The site is currently subject to a planning application from Persimmon for 83no. dwellings (16/P/0888/F).</p> <p>To the east ‘Land at North End’ is also allocated in the Publication SAP for 170 dwellings. Here a planning application (15/P/0946/O) for 170 dwellings has a resolution to approve subject to S106.</p>	 BRS.6625 16.08.17.pdf (431 KB)

Comment ID	Organisation	Comment	Attached documents
		<p>As can be seen from an inspection of the emerging policies map, this leaves what is left of the Rugby club sandwiched between two developments totalling around 250 dwellings. Evidently this is a sustainable location for additional housing development.</p> <p>As a result of the loss of the pitches at Moor Road, and due to the desire to continue to expand the club, alternative land has been identified on the edge of Yatton/North End. It is the club's intention to relocate to new premises, and build a high quality, purpose built facility for the club to meet its current and future needs. Discussions are underway with the landowner. This will result in the current facility/land being surplus to requirements during the pan period.</p> <p>Given the proposed allocation of land directly adjoining the Rugby club, and in the context of the exercise that the Council is now engaged with, we submit that the Plan should enable the development of the land for housing, by either by a site-specific allocation and/or by the extension of the housing development boundary. The receipts from the sale of the land would enable relocation to take place.</p> <p>In addition, a permissive policy enabling new recreational facilities in the Yatton/North End area should be included in the Plan. The Site Allocations Plan should be proactive in enabling both outcomes</p>	
9143521//1	Richards Developments	<p>At paragraph 22 of the note issued on 18th May 2017 (ID4) following the closure of hearings the Inspector states:</p> <p>"I consider that the Council should test the potential for the provision of up to 2,500 additional houses in order to identify the environmental costs of allocating a wider choice of housing sites. Furthermore, where new allocations are to be made, there is a need to identify and allocate sites which can be made available for development at an early date to help meet the five year supply as well as secure the overall delivery of the housing requirement by 2026."</p> <p>The instructions from the Inspector are clear and unambiguous. We are therefore extremely disappointed to note from CD2 that the LPA has not undertaken the work that has been requested.</p>	<p> Richards Developments Appendix 1.pdf (1.8 MB)</p> <p> Richards Developments Appendix 2.pdf (138 KB)</p>

Comment ID	Organisation	Comment	Attached documents
		<p>Firstly, at paragraphs 7 to 16 of CD2 the LPA seek to reopen discussion on the figure of 2,500 dwellings and make the case for a lower figure. This is inappropriate as it is not within the scope of work requested by the Inspector, and is clearly an attempt to row back on what was agreed during the hearing sessions.</p> <p>Secondly, the LPA is not testing the “potential for the provision of up to 2,500 additional houses”. Even if all of the 28 sites on which the Council is seeking comments are deliverable by 2026 they would only deliver a total of 1,812 dwellings. This falls significantly short of the figure of 2,500 dwellings that the LPA was asked to test.</p> <p>The key reason that the LPA has been unable to identify sufficient sites to meet the 2,500 dwelling requirement is the methodology that they have used, specifically:</p> <ol style="list-style-type: none"> 1. The LPA has decided to exclude sites where an application or pre-application request was not submitted before 18th May 2017. 2. The LPA has decided to exclude any sites that do not fully comply with the Core Strategy. <p>Despite the Inspector noting at paragraph 23 of ID4 that: “A further potential constraint to the identification of additional allocations is the distribution of housing identified in Policy CS14. However, CS14 refers to the “broad distribution of new dwellings” which indicates that the net additional dwellings listed in the policy do not constitute a straight jacket to be achieved, and that there is some flexibility for the distribution of housing provision within the settlement hierarchy in the CS.”</p> <p>This methodology has resulted in the LPA discarding a number of sites that could enable them to achieve the 2,500 dwelling requirement. One of these sites is the Land at Sousta Taverna, Congresbury. The Pre-Application Request submitted in respect of the site and the Pre-Application Report issued by the LPA are included at Appendices 1 and 2 respectively. While it is acknowledged that the site is not directly adjacent to the settlement boundary for Congresbury (a Service Village), the documents demonstrate that:</p> <ul style="list-style-type: none"> • The site is in a sustainable location, within walking distance of St Andrew’s Primary School (500 metres) and the local shops on Station Road (600 metres). It is also well served by public transport, with nearby eastbound and westbound bus stops (200 metres) that provide access to both Weston-super-Mare and Bristol. 	

Comment ID	Organisation	Comment	Attached documents
		<ul style="list-style-type: none"> • A third of the site is previously developed land with existing compatible uses on either side. • There are no technical constraints that would preclude development. • A high quality development of around 24 dwellings could be delivered. • The site can be delivered within the next 5 years. <p>Should the LPA continue with their current approach then the additional allocations that they propose will not be able to deliver the 2,500 dwellings that are required. This is a fundamental flaw that will either result in the Inspector asking the LPA to go away and undertake a more robust site assessment exercise, or in the worst case scenario finding the SAP unsound.</p> <p>In order to avoid this outcome I strongly urge the Council to pause the process and undertake a more thorough site assessment process now. This will enable them to identify sufficient sites to deliver the 2,500 dwellings that are required. While there is understandably a desire to get back to examination as soon as possible, the current approach will undoubtedly result in further delays (or worse) in the future.</p>	
11683201//1	c/o Pegasus Group	<p>Our clients have fundamental concerns with regards to the Council's approach to the identification and assessment of necessary additional sites. Whilst these issues have been touched on above we reserve the right to comment on these again when modifications on the SAP are consulted upon later this year.</p> <p>The site west of Wolvershill Rd Banwell represents a highly suitable location for development with no constraints that prevent development coming forward within the next five years. As such this can meaningfully contribute to addressing the Council's Five Year Housing Land Supply and the Examining Inspector's set target to allocate a further 2,500 new homes under the SAP.</p>	 BRS.6523 NSC JCM 17.08.17.pdf (530 KB)

Comment ID	Organisation	Comment	Attached documents
17520449//1	UTC	<p>UTAS Claverham UK hereby make Written Representations to the Site Allocations Plan - Further Site Assessments and contends that the Further Site Assessments should include its land at Claverham, being:</p> <ol style="list-style-type: none"> 1. The Commercial Aerospace Works (the main site) 2. Field to the North <p>The Main Site is already proposed for a residential led allocation with the draft Claverham Neighbourhood Plan and this should be confirmed and strengthened through allocation in the SAP given the brownfield nature of the land and its strong credentials as a deliverable and developable sit</p>	<p> UTAS Claverham UK Comments on Site Allocations Plan 'Further Site Assessments' Consultation Aug 2017 - Final.pdf (554 KB)</p>
17566785//1		<p>The methodology has resulted in the LPA discarding a number of sites that could enable them to achieve the 2,500 dwelling requirement. One of these sites is the Land North of Greenhill Road, Sandford. An outline planning application for up to 93 dwellings has been submitted for the site (Ref: 17/P/0887/O) and has yet to be determined. While it is acknowledged that the application is not wholly in accordance with the Development Plan as the majority of the application site falls outside the settlement boundary for Sandford (an Infill Village), the application documents demonstrate that:</p> <ul style="list-style-type: none"> • The site is in a highly sustainable location, directly adjacent to Sandford Primary School and within walking distance of the local convenience store (Sandford Village Stores). It is also well served by public transport, with the two nearby bus stops (located in front of the school) providing access to both Weston-super-Mare and Bristol. • There are no technical constraints that would preclude development. • A high quality development of around 93 dwellings could be delivered within the next 5 years. 	<p> Representation - Progress Land 21.08.17.pdf (544 KB)</p>

Comment ID	Organisation	Comment	Attached documents
		<p>Should the LPA continue with their current approach then the additional allocations that they propose will not be able to deliver the 2,500 dwellings that are required. This is a fundamental flaw that will either result in the Inspector asking the LPA to go away and undertake a more robust site assessment exercise, or in the worst case scenario finding the SAP unsound.</p> <p>In order to avoid this outcome I strongly urge the Council to pause the process and undertake a more thorough site assessment process now. This will enable them to identify sufficient sites to deliver the 2,500 dwellings that are required. While there is understandably a desire to get back to examination as soon as possible, the current approach will undoubtedly result in further delays (or worse) in the future.</p>	
2596033//3	Winscombe and Sandford Parish Council	<ol style="list-style-type: none"> 1. It was noted that the Woodborough Road, Studley site had not been included as a listed site although it was known the pre-planning advice had been sought for residential homes in this location (16/P/0872/PRE – retail store at ground floor and 9 No. residential units above (comprising 6 No. one bed flats and 3 No. three bed duplex apartments at first and second floor level), with associated parking with 10 No. houses (a terrace of 3 No. three bed houses, a terrace of 4 No. two bed houses and 1 No. three bed house and a pair of two bed, semi- detached houses). 2. It was noted that pre-planning advice had been sought for up to 42 new residences at Mooseheart, Woodborough Road on land in the AONB. This land would normally be afforded a high level of protection against development of this kind. 	

Report run at 30 Aug 2017 16:19:54. Total records: 128.