

North Somerset Local Plan 2036

Issues and Options Consultation Statement – March 2019

Introduction

This document explains how North Somerset Council undertook consultation in on the North Somerset Local Plan 2036 – Issues and Options Document (Sept 2018). It sets out how North Somerset Council has sought participation from communities and stakeholders across North Somerset. It covers:

- Which bodies and persons were invited to make comments;
- How those bodies and persons were invited to make comment;
- The material that was subject to consultation
- A summary of the issues raised

This consultation statement complies with the North Somerset’s Statement of Community Involvement (SCI). The SCI outlines that the Council is committed to effective community engagement, and seeks to use a wide range of methods for involving the community in the plan making process.

North Somerset Council’s Statement of Community Involvement was adopted in March 2015. This replaces the former SCI which was adopted in February 2007 and needed updating because of changes in planning legislation and increased use of electronic communication in the planning process. This revised Statement of Community Involvement (SCI) sets out how the Council will involve the community and stakeholders in the preparation, alteration and review of local planning policy and the consideration of planning applications. The SCI proposed that the consultation methods and those engaged would vary according to the purpose of the consultation and the bodies or persons who the council were keen to involve.

Background

The Joint Spatial Plan (JSP) provides the new development context to 2036. This will roll-forward the existing proposals contained in all four West of England Core Strategies and identify the additional housing and infrastructure needed to 2036. It will identify the new housing requirement for North Somerset and new strategic growth areas and infrastructure requirements but will not contain specific allocations. This will be the role of the North Somerset Local Plan 2036.

The Local Plan 2036 starts from a strong base. The existing elements of the development plan (Core Strategy, Development Management Policies and Site Allocations Plan) are recently examined and up-to-date. This will need to be reviewed but much will remain fit for purpose and can be incorporated into the new document.

The main changes relate to the new planning framework to be provided by the JSP. This relates primarily to the new housing requirement for North Somerset and the additional capacity which

needs to be identified (summarised as urban living, strategic development locations and non-strategic growth), necessary infrastructure required (particularly highways), and the employment, community and other allocations needed to deliver sustainable development.

Consultation on the Local Plan 2036 formally commenced in 2016 when a consultation on a Pre-Commencement Document was undertaken. This was a notice of intent that a new Local Plan will be prepared for North Somerset for the period 2018-2036 and set out its scope, methodology and programme. The consultation on ran from 14 June – 21 July 2016.

In Autumn 2017, in parallel with the consultation on the JSP Publication version, a ‘Generating Ideas’ consultation was undertaken by North Somerset Council with those communities directly affected by the strategic development location proposals in the JSP. This was to start the process of involving communities in shaping the detailed work for these areas to be progressed through the Local Plan 2036. The Generating Ideas consultation ran from 22 November 2017 and 10 January 2018.

Following the above engagement and consultation a Local Plan 2036 Issues and Options Document was approved at Executive on 26 June 2018 for consultation in September following the summer break.

Purpose of the consultation

The purpose of the Issues and Options consultation was to identify land use and planning policy issues that would need to be addressed throughout North Somerset between 2018 and 2036. One main issue is how to accommodate the proposed housing growth within the district up to 2036. Options were presented for this for the Strategic Development Locations and for Local Housing Growth. The consultation also explored issues and options around employment growth and transportation within and through the district including the two major transportation hubs of Royal Portbury Dock and Bristol Airport, as well as green belt and making the most effective use of land within our towns (Urban Living).

In all cases the issues affecting the areas/topics were set out and the question asked whether or not we had identified the correct issues and options and whether there were others which we need to take account of.

Who was consulted?

The intention was to engage with residents, businesses and employees across North Somerset rather than just those affected by the SLD proposals. This was done through a variety of mediums, including a standard mail out to all on our planning policy data base, press releases, articles in the local ‘free’ papers across North Somerset, Facebook videos and focus groups.

[How we consulted](#)

The consultation on the Local Plan 2036: Issues and Options Document commenced on 3 September 2019 and ran for 3 months until 10 December 2019. During this period numerous consultation methods were used to inform the public of the consultation and maintain interest and momentum in the process. The following methods were used to consult:

[Website and online consultation](#)

The Councils Local Plan 2036 webpages contained all the details relevant to the consultation including a link to the online consultation system where people could comment on the questions set out in the document online.

This information, with a link to the website and to the online consultation system, was sent out to 1410 stakeholders who were registered on our Planning Policy database on 3 September 2019. The database includes parish councils, adjacent authorities and parishes, planning agents, statutory consultees, local pressure groups and organisations as well as individuals.

A further reminder e-mail was sent out on 7 December 2018 to 1,600 stakeholders¹ on our database to remind people that they only had a few days left to respond.

[Press/publications](#)

A double page article was put in the Sept/Oct issue of [North Somerset Life](#) setting out the dates of the consultation, how to respond and the issues and options that were set out in the plan. This is a free publication distributed to all households in North Somerset.

Similar articles were also put in the October 2018 issues of a number of the “free to door” papers/magazines- Gordano Living (includes Portishead and Pill), Nailsea and Backwell Living, Clevedon and Tickenham, Yatton and Congresbury (includes Cleeve Claverham and Churchill), Cheddar and Axbridge (includes Winscombe and Sandford), Long Ashton and Failand magazines.

Articles were put in the Town and Parish Digest on the 12 September and 21 November 2018 which is sent out to all parish councils and an article was put in Members Only which is circulated to all North Somerset Councillors.

[Posters](#)

On 11 November 2019 a [poster](#) was e-mailed to parish councils who were asked to print and display them at suitable places around their parish e.g. parish noticeboards, village hall, community centres etc. This was half-way through the consultation period and was intended to remind people to respond or inform people who weren't already aware that the consultation was happening.

[Social Media](#)

A social media campaign was launched in the first week of the consultation. The campaign involved releasing short informative videos about different topic areas covered in the Local Plan throughout the consultation period. The following videos were posted on Facebook:

¹ The number of stakeholders went up as people registered on the database to respond to the consultation.

- 1) [Local Plan 2036](#) – posted on **5 September 2018** this video provided a brief overview of what a Local Plan is and what issues were facing North Somerset. This post reached 26,346 users.
- 2) [Local housing by 2036](#) – posted on **9 October 2018** this video summarised the issue of non-strategic housing explaining how the Local Plan will need to find housing sites in the towns and villages across North Somerset. This post reached 13,388 users.
- 3) [Garden villages and new communities](#) – posted on **1 November 2018** this video set out where the proposed strategic development locations (SDL) were and the proposed number of houses and associated infrastructure for each SDL. This post reached 15,754 users.
- 4) [Getting around in 2036](#) – posted on **15 November 2018** this video summarised what potential transport schemes in terms of road, rail and public transport schemes will be proposed in the Local Plan. This post reached 12,647 users.
- 5) [Urban Living by 2036](#) – posted on **26 November 2018** this video explains how we will try and maximise development of brownfield sites in towns to accommodate housing growth. This video reached 9,428.

In the final week of the consultation the first video was posted again as a reminder that the consultation was coming to a close.

All the posts had a link to the Local Plan webpage where all the consultation documents could be accessed in full and where people could respond online. The total number of “Linked clicks” (i.e. people who actually clicked through to the website to find out more information) was 560.

Overall, the total reach for all five posts was 77,500. The video with the highest engagement rate was ‘Garden villages and new communities’ with a fifth of people who saw it interacting with it in some way.

As part of the social media campaign, and to try and engage with young adults aged 16-24 an “Insta Story” was posted on Instagram in October 2018. It asked the question “*I want the first home I buy or rent to be in North Somerset*”. Of those who participated 84% responded ‘yes’ and 16% responded ‘no’.

Focus Groups

As part of this consultation process workshops were held with representatives from the local communities where the Strategic Development Locations are proposed. The workshops developed upon the feedback from the ‘Generating Ideas’ consultation which was held in Nov/Dec 2018 and sought initial views from these communities on the proposed SDL’s. These workshops provided a more detailed and focussed exploration of the key principles and place-making elements for these areas which can then be further considered and refined through the Local Plan. The workshop dates with links to the feedback reports are set out below:

- [Banwell Garden Village Workshop](#) – 8 November 2018 from 7-9pm at Banwell Children’s Centre
- [Nailsea Urban Extension Workshop](#) – 20 November 2018 from 7-9pm at Tithe Barn, Nailsea
- [Backwell Village Workshop](#) – 12 November 2018 from 7-9pm at Backwell School

- [Mendip Spring Garden Village Workshop](#) – 14 November 2018 from 7-9pm at Churchill Primary School.

Some common themes emerged from the workshops such as:

- The importance of high quality good design and a variety of design styles – not homogenous bland volume housing building. Good design was considered essential in terms of the building styles and the overall masterplanning.
- The importance of getting the transport infrastructure, e.g. roads, as well as social infrastructure e.g. schools, doctors, community centres etc built first before the houses.
- Significant concerns about the impact of the proposed level of new housing on the existing road network.
- Concern about the impact on the environment in terms of impacting on wildlife and their habitats as well as visual impact on the landscape and the loss of countryside.

The more detailed comments can be viewed in the feedback reports from the workshops (see links above).

[Level of Response](#)

There were 537 respondents to the consultation with a total of 2095 comments. Of the 537 respondents 406 submitted their representation by e-mail, 24 by post and the remaining respondents responded online. The type of respondent is broken down as follows:

Individual/resident – 75%

Organisation – 5%

Local action group/campaign group – 2%

MP/Town or parish council/District councillor/adjacent authority – 5%

Development Sector – 12%

Business – 1%

A schedule of all the responses received is available to view on our website entitled [Responses Received to the Issues and Options Consultation \(Jan 2019\)](#)

Main Issues Raised

Section 1: Introduction

Why do we need a new Local Plan?

15 comments were made solely on the principle of producing the new Local Plan in advance of the examination and adoption of the submitted Joint Spatial Plan, all of which consider the Issues and Options document to be premature. It should be noted that these sentiments are echoed by significantly more responses, particularly those in relation to Strategic Development Locations.

The comments can broadly be summarised as concern that the Issues and Options document is pre-judging the outcome of the Joint Spatial Plan, and other related workstreams such as transport and green infrastructure.

How will the housing requirement be met?

41 respondents commented in respect of this question, 19 were from developer and landowner interests whose responses sought to increase the overall housing requirement and/or were framed to reflect the type or location of site being promoted. 14 were from individuals, many of whom were opposed to the proposed SDLs, 2 from parish councils and one from a neighbouring council.

Relationship to JSP

- Progress with Local Plan ahead of JSP is premature. Once adopted the JSP will set out the development requirements for the Local Plan. NSC is required to review and update local plan alongside the JSP.
- JSP overall requirement is likely to rise through the JSP examination as a result of issues relating to affordability and economic growth assumptions and applying standard methodology (9). Full objectively assessed need is at least 140,000 dwellings – this would require 35,000 dwellings in North Somerset. It will not meet the need for affordable housing.
- Standard methodology gives NSC a minimum housing requirement of 26,760 – the current apportionment is too low. JSP is not based on standard methodology, but NSC Local Plan will be.
- No evidence supporting the proposed need for 25,000 dwellings by 2036. If this is part of the JSP it should be made clear.
- Review of housing requirement is overdue – required in 2018.

The overall requirement is too low

- In terms of housing supply, the Local Plan must build in sufficient flexibility. In order to boost significantly the supply of housing and ensure a 5 year supply NSC should be allocating a greater amount than the minimum required.

- Housing crisis is a blight. Plan provides the opportunity to ensure a supply of new homes in sufficient volume to put an end to the housing crisis in North Somerset.
- Laney's Drove appeal identified 4.4 years so housing policies are not working – the need to build houses is the key issue.
- Proposed housing supply only provides a surplus of 82 over the 20 year period – no flexibility.
- Windfall allowance and urban living component are both optimistic. Need to provide more non-strategic growth.
- Concerns about deliverability of SDLs and unrealistic housing trajectories. Research indicates that average planning approval period was 6.1 years once legal interest in the land has been secured. On average larger schemes (over 2,000) delivered fewer than 200pa. Weston Villages was 93 dwellings pa.

Other issues relation to the overall requirement

- Need to break down overall need to identify local need.
- Need to clarify whether proposed housing figures are a minimum.
- Housing requirement should be continually reviewed and take into account census, economic climate, Brexit.
- Brexit will reduce scale of required development.
- 102,200 homes and only 82,500 jobs is flawed – to afford the housing requires 2 jobs per household so need in excess of 150,000 jobs. Applying this 80% ratio to Nailsea identifies only 3,400 jobs – means very few young people and families will be able to afford to move into Nailsea.

Encourage smaller scale opportunities

- Given previous completion rates, the proposed annualised rate is unrealistic. Need more positive approach to conversion of rural buildings to help boost supply. Focus on identifying smaller sites adjacent to larger settlement boundaries. Will deliver significant housing supply without long lead in times.
- Strategic sites should not be the main focus – recognise value of smaller scale developments through reviewing settlement boundaries or small scale allocations. Need to achieve 10% of housing allocations on sites of 1ha or less.
- Concern over over-reliance on SDLs given the cost of delivering transport improvements. Even if funding is secured, delivery will be over a longer time period. Need to increase non-strategic growth.
- Multiple dispersed allocations will not have such concentrated impacts or require such wide scale mitigation.
- Support small sites but need evidence to support suggestion that they achieve 40 dwellings/ha and as 'relatively easier to deliver'.
- Policies restricting development based on settlement boundaries and hierarchy should be dispensed with until housing crisis is fully resolved.

- Retain current policy which allows development adjacent to settlement boundaries – provides flexibility as a time when there is an under supply of housing.

Provide more development closer to Bristol

- Bristol is the main driver of the economy; the main challenge will be out-commuting. Strategy of self-containment hasn't worked. Identify housing sites closer to Bristol.
- Locate housing close to major employment centres and preserve character of rural North Somerset.

Consider Green Belt opportunities

- Need to consider additional Green Belt release.
- Need for a full and detailed Green Belt assessment – to include small to medium sized developments as part of adjustment of settlement boundaries.

Greater priority to environmental issues

- Development of less environmentally-sensitive areas.
- Need to protect green fields for general well-being, environment, leisure, farming and future generations. How can NSC ensure planning permissions are built rather than land banking?
- Need to protect corridors of green land dividing places, towns and villages.
- To continue building on floodplain would be grossly negligent.
- Given extent of Green Belt, floodplain and AONB it is unreasonable that NSC should be obliged to provide some 2,800 homes on a very limited area of remaining land.
- Redraft all planning policies so they are much shorter and practicable, prevent all development in AONB, Green belt and floodplain unless it is previously developed or required for national infrastructure, elsewhere assess all non-developed land to assess its use and to inform decisions on which land is suitable to be built on.

Brownfield land

- Core Strategy already includes policies which prioritise previously developed land, but it is not clear whether these policies have been effective.
- Measures should be introduced to ensure agreed developments, particularly brownfield sites are implemented and not delayed.

Weston-super-Mare

- It is sensible and desirable to focus growth on Weston.
- Based on average annual housing completions (absorption rate) in Weston over last 10 years of 346.2 dwellings pa and existing supply of 11,500, there is sufficient land to maintain absorption rates for over 33 years. However, no improved self-containment in Weston so directing further housing growth towards the Weston area is only likely to promote unsustainable patterns of growth.
- Without an adequate economic growth plan for Weston, people will commute to Bristol.

Other opportunities

- Shopping centres should be converted to residential.
- Need a more pragmatic vision focussed on strategic and non-strategic growth in locations where existing transport infrastructure can be improved and optimised more effectively – rather than a reliance on ambitious new infrastructure.
- Encourage more eco-homes which can be erected more cheaply and easily.
- Encourage more inspirational houses in the countryside.
- In areas of high housing demand, high rise development should be encouraged – close to transport hubs.

Other comments

- Support house building industry as a major employer and secure New Homes Bonus to top up council tax revenue.
- SDLs must be thoroughly tested to ensure they are deliverable, viable and located in areas which are or can be made sustainable.
- Location of developments appears to be driver by financial gain rather than the selection of the most beneficial locations for the community.
- Government should be asked to take account of local issues and not allow developers to exploit the rules and develop inappropriate sites not compliant with the good intentions of the plan.
- Sedgemoor supports joint working on cross border housing and transport infrastructure issues.
- Need to explain why the identified locations need more housing – there is no business case.
- Housing affordability is a significant issue which should be a major factor in shaping policies.
- Increasing densities on its own is not considered to represent a realistic option for growth – there is no evidence that this would deliver the level of growth required.
- Need to consider air quality improvements on A370.

[Sustainability Appraisal](#)

The draft Sustainability Appraisal Scoping Report was consulted on alongside the Local Plan Issues and Options document. The Scoping Report is the first stage which sets out the context, objectives and approach of the assessment. Five questions were set out in the Scoping Report and 49 comments were received in total. A full [schedule of the comments received](#) can be view on the Local Plan 2036 website. The comments have been summarised below:

Qu1: [Do you agree with the proposed Sustainability Appraisal Framework?](#)

A summary of the responses:

- Recommend a review of the criteria-based approach and SA objectives relating to access to services, including healthcare, schools, public open spaces
- Green belt should feature within the SA framework objectives

- Welcome approach for consistency with the JSP framework
- Concern that SA framework replicates the WoE JSP framework

Qu2: Is there any significant environmental, social or economic data missing or misrepresented?

A summary of the responses:

- Specific impact of proposed airport expansion on the above needed
- Health risks associated with increased vehicle emissions
- Water quality and quantity information missing from the environmental baseline section
- Areas sensitive to water pollution should be identified
- Reference should be made to latest climate projections, UKCP18
- Should seek to address shortfall in WoE affordable housing provision

Qu3: Have all relevant plans and programmes been referenced?

A summary of the responses:

The report should include -

- North Somerset and Mendip Bats Special Area of Conservation (SAC) SPD
- Emerging West of England Green Infrastructure Plan
- JSP Appropriate Assessment
- Health Impact Assessment
- Bristol Airport Expansion Master Plan to 2040
- UKCP18 climate change projections
- Emerging updated Strategic Flood Risk Assessment
- River Basin Management Plan for the Severn Basin district
- Water Framework Directive

Qu4: Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan document?

A summary of the responses:

- Cumulative impacts from additional housing, transport and airport expansion is required
- There is considerable transport and pollution poverty for which it is inadequately compensated
- More information on effects of recreation on legally designated sites
- Areas sensitive to water pollution should be identified e.g. source protection and drinking water protection zones

Qu5: Is the proposed methodology for the next stages of the Sustainability Appraisal correct?

A summary of the responses:

- Only correct if consultation responses are incorporated and evaluated
- The methodology for determining site allocations must be robust, justified and transparent

- Methodology insufficient for volume of development proposed
- Unacceptable as excludes detrimental impacts of airport expansion
- The SA baseline should provide a breakdown in the typologies of the housing need.

Section 2: North Somerset Wide Issues

1. Weston-super-Mare

Qu1: Do you agree with these issues or are there other challenges or issues which we have not included and how might the Local Plan address these?

Out of the 32 responses there was general agreement with the list of issues identified. Additional issues raised were housing affordability and a review of the strategic gap.

Generally, although the approach was supported, there were many comments which suggested a need for additional analysis before deciding on the policy approach as follows:

- Although there was some support for retaining the employment led approach the view was also expressed that there is a need to assess the effectiveness of the policy and potentially therefore re-assess it, including live work units.
- Similarly, an assessment of the effectiveness of redevelopment of brownfield sites up to now is needed before continuing the emphasis on this.
- Although the approach to the town centre is supported (three comments) viability needs to be addressed as more redevelopment would be forthcoming within the town centre if there was a review of CIL, affordable housing, car parking and policies to protect tourism.
- An assessment of retail and leisure needs is needed and a continuation of the approach of restricting edge and out of centre shopping to continue to protect the High Street.
- There are service and infrastructure deficiencies in Weston and these should be assessed, recognised and addressed before additional development (4).

The view was expressed that urban intensification cannot deliver the amount of growth needed and that more sites should be allocated anyway but also in order to address affordability (2).

Concern was also expressed that if densities are too high it will have a detrimental effect on placemaking and wellbeing.

2. Clevedon

Qu2: Do you agree with these issues or are there other challenges or issues which we have not included and how might the Local Plan address these?

There were around 25 responses which relate to Clevedon. The issues raised were widespread, but the most notable topic areas were the JSP contingency site for 1,000 houses east of Clevedon, green belt, employment and the type of housing required within the town.

More housing

Five responses related to the type of housing required within the town. Policies should recognise the need for sheltered housing (2) and that there is an under-provision for affordable and family housing.

Contingency site east of Clevedon

The contingency site was not supported (5) with flooding issues and alternative better sites, being the main reasons given.

Green Belt

There were three representations stipulating that any green belt releases should be definitely “small scale” but that this should be defined. The opportunities for green belt release here is considered contradictory to the lack of willingness to consider GB release between Bristol and the ring road.

Employment

Need to encourage an increase in employment and infrastructure
St Modwen’s site e of Kenn Road should be considered for mixed use

Other issues

Town centre-additional housing development opportunities will increase footfall and act as an impetus for regeneration of the town centre
Infrastructure-should be improved transport facilities between Clevedon and Yatton Station.
Ecology-more work needed to assess potential ecological effects of large scale development proposals on the coast and east of the M5.

3. Nailsea and Backwell

Qu3: Do you agree with these issues or are there other challenges or issues which we have not included and how might the Local Plan address these?

There were 68 representations to the Nailsea and Backwell section, with some of the points raised overlapping with sections 4.3 for the Backwell SDL and 4.4 for the Nailsea SDL.

Five respondents specifically claimed that the proposals were premature in advance of the JSP outcomes. It is for the JSP to test the principles and impact on wildlife, transport, flooding with 12 claiming that the developments would be better located adjacent to Bristol where more sustainable transport options exist, there would be less impact on bats, less impact on the character of Chelvey, Brockley and Backwell. A number objected to the SDL’s on the grounds that the scale of development was too large.

There were six representations in general support of the key issues raised although the majority of comments in relation to the issues were raised in relation to a particular issue.

Issue 3 - support the need to address the environmental implications on international protected habitats and floodplain areas however three respondents advised that much more work is needed to inform the impacts.

Issue 7 - redistribute some of the SDL growth around Nailsea. There were 7 responses in support of this including the Town Council however thirteen were against this proposal which would necessitate the removal of land to the north east of Nailsea from the green belt on grounds that exceptional circumstances have not been demonstrated, impact on wildlife, traffic through Wraxall and flooding. There was equal support and objection to small scale green belt release (6 each)

Issues 6 and 9 - There was support for improving the town centre and recreational and cultural facilities.

Issue 2 and 10 - A great number of comments (30) were directed at the impact on traffic of the developments and also the effect of the proposed new roads. Although it is considered that the transport improvements both strategic and local are vital, including public transport, nine representations raised the concern that it would not be possible to satisfactorily address the traffic issues arising from the proposals and that the transport proposals are undeliverable. Objections were raised to the transport hub at Nailsea and Backwell station, the unacceptable increase in traffic through Wraxall and Flax Bourton and the fact that the proposals would not benefit Backwell, or improve the capacity and safety issues on Station Rd and the A370 crossroads.

Issue 8 Employment comments largely related to Nailsea in particular Nailsea needs to deliver much more employment before this scale of housing is acceptable and to consider an employment led approach like W-s-M. It was also suggested that existing employment uses should be relocated to south west Nailsea.

Other concerns raised are

- Potential effects on heritage assets (Tyntesfield and Belmont Estates)
- Impact on High quality agricultural land
- School provision within Backwell needs a holistic approach including a single primary campus in the heart of the village
- Protection of the strategic gap between Backwell and Nailsea
- Need for affordable housing should be assessed as well as the need for housing for older people and provision of retirement homes

4. Portishead

Qu4: Do you agree with these issues or are there other challenges or issues which we have not included and how might the Local Plan address these?

There were 31 responses to this section. Three explicitly broadly supported the key issues set out.

Comments centred on the following topics

Growth

- It was most commonly felt that Portishead should not be the subject of additional development and should be allowed to consolidate past growth. In particular there was objection from individuals to any small scale green belt releases to accommodate employment or housing growth as this was considered to be the thin end of the wedge (5).
- Alternatively it was also considered that Portishead was well placed to support additional development given its proximity to Bristol (commensurate with infrastructure expansion), however there was strong (9) opposition to development before sustainable transport had been addressed and in particular the re-opening of the Portishead Railway Line.

- Representatives of the development industry generally supported additional development with a green belt review, particularly at Bristol Road, although not between Royal Portbury Dock and Portishead (effect on biodiversity directly and through increased recreational pressures and erosion of integrity of the Green Belt) and not before an SFRA and GI plan are completed.
- It was considered that additional employment land is needed to support the existing population and counteract out-commuting (2).
- There is a need for additional affordable housing and housing for the needs of older and retired residents as well as more housing for existing residents to move into.

Town Centre/facilities

- Two comments raised the issue of needing to address the on-going resilience of the town centre area and High Street should be a priority issue. The Local Plan presents the opportunity to ensure policies develop the necessary flexible approach to its future management and protection.

Impact of Royal Portbury Dock

Opinion was expressed both for and against any additional development at RPD both pro supporting employment opportunities for Portishead residents and against, the physical and visual impact of the Dock including the impact of traffic on the already congested A369 particularly at peak times.

5. Green Belt

Qu5: Do you agree with these issues or are there other challenges or issues which we have not included and how might the Local Plan address these?

There were around 124 comments made against this section. In general more comments were made in favour of Green Belt release on various scales, rather than retention of existing boundaries, but as for other areas of the Plan concerns were expressed that it was premature for the Plan to rule out green Belt release adjacent to Bristol in advance of the JSP examination.

Pressure for GB release in SW Bristol area

The greatest number of comments were in favour of Green Belt release adjacent to Bristol instead of the SDL locations (42) and some specified between the South Bristol Link and the edge of Bristol (10). The main reasons given were:

- Very small proportion of Green Belt needed (2%) compared to the large proportion of North Somerset which is Green Belt (40%) (18)
- The Green Belt has been in place for many years and fulfilled its' purpose of preventing sprawl in that time, but is now strangling Bristol, putting more environmentally sensitive areas at risk. (13)
- Development would be better related to employment, facilities and provide a more sustainable transport option. (22)

- Hypocritical to allow airport expansion in the Green Belt but not consider development adjacent to Bristol. (15)

Full Green Belt review

A number of arguments were made for a comprehensive Green Belt review, given the longevity of the existing Green Belt boundaries (13) with two suggestions for methodology. It was suggested this should go hand in hand with a site assessment. Amendments should reflect built development.

Local Green Belt amendments

The support for local green belt alterations outweighed the objections with 17 in general support and 5 additional suggestions for sites.

While there was some support for Green Belt release north of Nailsea (to accommodate some of the Nailsea SDL strategic growth) with accompanying extension around Backwell Lake, there were twice the number of objections to this suggestion.

Likewise although some support was expressed for alterations to the Green Belt to allow for additional airport expansion and associated uses (3), this was overwhelmingly outnumbered by objections to any encroachment into the Green belt around the airport (12).

There was only one response relating to support for GB release at Royal Portbury Dock to enable mixed use development.

There was support for no net reduction in Green Belt with compensatory designations around Backwell Lake and the Mendip Hills in lieu of GB loss adjacent to Bristol.

Other less frequently raised issues

There was a suggestion that all villages within the Green Belt should be inset and settlement boundaries eased to allow for small amounts of additional development.

Housing should only be allowed in the Green belt if it is affordable housing for local needs.

6. Central Parishes

Qu6: Do you agree with these issues or are there other challenges or issues which we have not included and how might the Local Plan address these?

There were 36 responses to this question and the comments are summarised below:

Support or agree with the issues raised.

There were 9 comments in support of the issues raised. 2 specifically raised local roads as the key concern, three highlighted flooding and one indicated that it would not be possible to retain the character of the villages in point 4.

Issues missed

There were 10 comments received relating to the omission of issues. These related to fairly wide ranging topics including:

- opportunity to incorporate zero carbon
- lack of detail in the SDL impacts
- adequate assessment of resulting traffic through Congresbury
- opportunities for community led housing (CLH)
- lack of reference to the rural economy, especially tourism
- public transport
- local services
- Impact on Mendip Hills AONB should also be included here
- Slowing climate change
- Lack of reference to future opportunities at Puxton
- Should be acknowledged that infrastructure should come first
- Ecological issues should be paramount

SDL's themselves

Premature in advance of the JSP outcomes

1 representation gave support to the SDL's with 7 representations disagreeing with them. Of these 2 stated that Green belt should be amended instead. One agreed with Banwell and the bypass but disagreed with Churchill/Langford.

7. Mendip Hills

Qu7: Do you agree with these issues or are there other challenges or issues which we have not included and how might the Local Plan address these?

There were a total of 48 representations on this section/question, many of them relating to issues about the proposed Strategic Development Locations at Banwell and Mendip Springs and almost exclusively raising objections especially with regard to Mendip Spring.

There was support for recognition of the importance of the AONB, but that this needs strengthening. In particular

- The significance of the AONB far outweighs the importance of the green belt adjacent to Bristol (15)
- The adverse effect on the AONB will be irreversible with no mitigation possible (14)
- It is fundamentally at odds with the principles of the AONB (4).
- The impacts will be contrary to the NPPF because of the environmental, ecological (including watercourses) and landscape impacts on the AONB itself and the adverse effects on local roads and villages, including Congresbury (16). Other less frequently raised issues were light pollution and the economic impact or reduced visitors because of the erosion of the setting.
- Impact on surrounding villages should be considered as an issue.
- The location adjacent to the AONB was also criticised by three members of the development industry on the grounds that it underestimates the adverse impacts on the AONB and will

unnecessarily restrict development. Other locations would be less constrained (e.g. The Vale and East of Clevedon)

Section 3: Local Housing Growth

Within the Local Housing Growth Section 212 comments were received. 26 of these were general comments, 81 were about the settlement hierarchy and 105 were in relation to settlement boundaries.

Local Housing Growth General comments

A number of the general comments on Local Housing growth were related to technical documents such as the Strategic Housing Land Availability Assessment and The Landscape Sensitivity Study, and about the role of neighbourhood plans in the planning process. These comments are summarised in the relevant sections below. In terms of overall comments about Local Housing Growth respondents felt that:

- The Joint Spatial Plan requirement for non-strategic growth will increase significantly following the JSP hearings in May.
- The plan places too much reliance on the strategic development locations to deliver its housing requirement and these are unlikely to be delivered, particularly in the short to medium term. Therefore, there needs to be more emphasis on non-strategic sites.
- The council need to undertake a detailed review of the Green Belt to ensure that potential development opportunities are not being overlooked.
- Certain designations should remain such as Green Buffers, Green Belt, Settlement Boundaries and Strategic Gaps.
- The impact on the Mendip Hills AONB should be a consideration when reviewing the boundaries of settlements in or adjacent to the AONB including Banwell, Churchill, Winscombe, Bleadon, Hutton, Sandford and Blagdon.
- Constraints should not be considered as absolute if they preclude the consideration of more sustainable options. Therefore, sustainable areas in the Green Belt and areas of flood risk should not be ruled out.
- Concern about the focus on green field sites when more sustainable brownfield sites should be prioritised.
- General support for the allocation of more small to medium sites.

Strategic Housing Land Availability Assessment

A small number of respondents commented on the Strategic Housing Land Availability Assessment (SHLAA) either in terms of specific sites, or regarding the methodology used. Comments included:

- SHLAA is based on the existing policy framework and as a result sites which might be suitable under a revised policy framework are excluded or not scored positively.
- Concerns as to why a large site in the SHLAA next to Bleadon is rated as 'likely' as Bleadon is not a town or service village.

- Concern that of the land identified and entered into the forward plan process, most sites have been discounted without full and proper wide ranging testing. That does not lead to robust plan making and is considered unsound.
- Cleve Parish Council expressed concern at some of the sites identified in the SHLAA and the LSA as although these sites have low landscape sensitivity they have other constraints.
- Two sites in the SHLAA in Claverham (West of Jasmine Lane and North of Chestnut Drive) are within the Neighbourhood Plan area and have been assessed as ‘potentially being suitable for development subject to further plan making’. A respondent felt that these sites were unsustainable and unsuitable for development in the context of Claverham NDP.
- The 'call for sites' and SHLAA process confuses residents, particularly where a Neighbourhood Plan is being developed at the same time. There needs to be clarity and transparency about the status of sites listed, where they are not part of any adopted Sites Allocation and are contrary to proposals in emerging Neighbourhood Plans.
- The site at Land at Dinghurst Road, Churchill – Respondents disagree with the category B: “less likely” categorisation. They feel it should be category A “likely”.
- Whilst the methodology Part 1 assessment excludes sites which are entirely within the AONB, it is considered that sites adjacent to settlement boundaries and which fall partly within the AONB and which propose housing of 10 units or more should, where development (including of infrastructure) falls within the AONB, also be excluded within Part 1 assessment. In terms of Part 2 assessment of SHLAA sites this should include reference to sites within the setting of the Mendip Hills AONB and consideration should also be given to the cumulative impact of the any SHLAA sites on the setting of the Mendip Hills AONB (*Mendip Hills AONB Unit*).
- Site reference HE18287 and has discounted as it is currently Green Belt. Respondent feels this should be reviewed in light of the potential release of the wider site by BCC and the findings of the JSP’s Stage 2 Green Belt Assessment. The site is identified as within fluvial flood zone 3b, however, the vast majority of the site in question is not within flood zone 3b. It would be helpful if this were clarified in the SHLAA table.

Neighbourhood Plans

Several comments were received regarding Neighbourhood Development Plans which are set out below:

- LPAs need to set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development to conform with para 65 of the NPPF and to promote sustainable development in rural areas.
- Clarity is needed between local Parish Council Neighbourhood Plans (NDP) & Parish Plans, district NSC Local Plans, regional Joint Spatial Plans (JSP) and Central Government directives, including those used by the Planning Inspector to seemingly override local and district decision making. Also, clarity between NSC Local Plan and associated SHLAA and local Parish Council allocations.

- Neighbourhood Plans should be in conformity with the Local Plan. It is expected some elements of Neighbourhood Plans may become out of date as the Local Plan progresses and further weight is given to emerging Local Plan policy.
- We would like to see more weight given to neighbourhood planning. It seems section 3 provides only a small paragraph on how neighbourhood plans will work and we believe more detail should be given and how North Somerset Council will adhere to these plans.
- A reference to Town Visions would be appropriate in this section.
- It is too easy for developers to set aside neighbourhood plans if they are considered not to be “up to date”. The revision of a plan requires the same process as approval of the original plan, including examination by an inspector and a referendum, a process which is costly and unlikely to be undertaken by a parish a second time. There is little assurance elsewhere in the document that NDPs will receive consideration and incorporation into the Local Plan. Developers seem to regard NDPs as being an easy target to set aside inconvenient policies. Policies are needed in the plan that will support and protect NDPs and ensure their long-term retention.

Landscape Sensitivity Study

- One specific comment regarding the fact that The Landmark Practice undertook a detailed analysis of the land at Black Rock (SHLAA Ref: [HE18124](#)) in both summer and winter conditions and they reached a different conclusion to the North Somerset Landscape Sensitivity Study regarding the site and land to the North of Hollis Avenue (paras 6.4.21).

Settlement Hierarchy

Qu8: What are your views on the options for a revised settlement hierarchy?

A total of 81 comments were received in relation to settlement hierarchies. The majority of support was for options 1 and 2, or a combination of both which included a new tier but also reassessed the position of all the settlements. There was also some support for option 3, although this was more limited. The general comments included:

- Settlement hierarchies are unrealistic and inflexible. It ought to be possible to identify the opportunities and constraints in all the major settlements - either they are sustainable and suitable for growth or they aren't.
- Current policy is too restrictive for infill villages and is preventing suitable, sustainable, high quality development from coming forward.
- There should be flexibility in the emerging Local Plan to enable appropriate sustainable small-scale development.
- Accurate up-to-date assessments of the sustainability of each settlement is required, including an assessment of broadband availability.
- An overall strategy for North Somerset with the council building genuinely affordable homes near communities according to their need would be preferable to tinkering with hierarchies.
- It is essential that the needs of rural settlements across the authority area are assessed and meaningful growth apportioned to them to ensure their ongoing vitality and viability.

- New development can improve existing services and facilities and ensure that they are maintained and not lost due to lack of support.
- No discussion in the plan as to what tier the service villages will be allocated to – suggestion of an additional tier for SDLs.
- The current hierarchy doesn't work as Yatton has had significantly more development than the neighbouring larger settlement of Clevedon during the Core Strategy plan period.
- Hierarchy review should consider how travel demand, particularly car use, could be managed and reduced, impact on the SRN and the ability to deliver necessary infrastructure improvements.
- House builders Federation suggests a combination of all 3 options is the most flexible as the settlement hierarchy needs to be as permissive as possible.
- Portishead has grown massively in the last 20 years. Shouldn't receive anymore growth
- The plan seems to be accommodating regional growth not district growth.
- A review of the hierarchy needs to be undertaken in association with a detailed review of planning constraints to ensure all communities have the ability to grow either through a permissible policy approach or by way of specific site allocations.
- The council should provide evidence to demonstrate how many dwellings have so far been delivered through the current CS policy and identify any barriers experienced.
- A review of the contribution smaller settlements can make is welcome – a combination of all options should be applied to ensure settlements are not unnecessarily constrained.
- A review of the hierarchy is more relevant to the tiers beneath the four towns.
- Strategic Gaps – No national guidance for Strategic Gaps. The Strategic Gaps conflict with the settlement strategy to focus the majority of development at the most sustainable settlements.
- Concern that revising the settlement boundary and changing the terminology will be viewed as just trying to promote ease of development.
- The council need to draw on a wider choice of sites and smaller villages will play a role in delivering these sites – particularly the small sites required by the NPPF.
- Sustainable modes of development should be prioritised to allow people to work on the land e.g. small holders.
- Options 2 and 3 disadvantage people who rely on public transport.
- Is the concept of hierarchy familiar to and well understood by local communities? Each community thinks of itself as an individual case, and should be treated as such.
- The hamlet of West End is wrongly classified in the hierarchy - it should be reclassified as countryside.

Regarding the different options the following specific comments were made:

[Option 1: Keep the existing hierarchy but re-asses the position of each settlement within the hierarchy.](#)

This option had the support of around 18 respondents who chose it as they favoured option. The respondents were a mix of local residents, parish councils, the development industry or people

promoting particularly sites which would be acceptable under the existing hierarchy. The reasons for this being the preferred option amongst these respondents were:

- The established hierarchy makes sense as it orders settlement by size and it is the larger settlement that should be the focus of development as they already have the necessary infrastructure and services.
- Introducing an extra tier, as suggested in Option 2, would over complicate the policy position. Option 1 was well understood and established.
- Support for the existing settlement hierarchy amongst a number of respondents promoting land a Churchill/Langford stating that it should remain as a service village given its range of services and facilities.
- Option 1 is appropriate, and the other settlements are so constrained.
- Hallam land support Option 1 stating that housing and employment growth should be directed to Clevedon.
- Option 1 enforces decision making based on the evidence available and removes the opportunity for political fudging and blurring of the lines of accountability for planning decisions.
- Town and Parish Councils which supported option 1 included Portishead, Long Ashton, Cleve, Bleadon (if Bleadon remains as an infill village), Barrow Gurney and Backwell (if Backwell remains as a service village).

Reason for not supporting Option 1 were:

- Options 1 and 2 don't work as towns are constrained and the current hierarchy has still resulted in large scale housing in service villages.
- Option 1 is too restrictive and prevents future development from coming forward as it has been demonstrated in the last two to three years.

[Option 2: An expanded hierarchy with an additional tier between Service and Infill villages.](#)

Of those respondents that specifically supported an option 7 people supported Option 2 with support being from the development industry with sites to promote in smaller settlements and from local residents who felt that their settlement could benefit from some small scale housing development. Reason for supporting Option 2 were:

- Inclusion of an additional tier for larger infill settlements and smaller services villages would give the capacity for small scale growth where appropriate.
- Support from Banwell Parish Council as it was felt it spread the load of accommodating the non-strategic growth across more settlements.
- Congresbury PC support option 2 as they feel they would fit better in the additional middle tier as they are not as big as other service villages but larger than most infills.
- Option 2 would allow small scale growth in small villages that could help them become more vibrant communities.

- Support for this option if there was the caveat that smaller villages than could not access services in larger settlements were excluded.
- Cleeve suggested as being suitable for the additional tier.

Reasons for not supporting Option 2 were:

- An extra tier takes the focus away from the established principle that the larger settlements should rightly remain the focus for sustainable development.
- Expanding the hierarchy seems an artificial way of justifying more development in already unsustainably developed locations.
- Option 2 will unnecessarily increase pressure on smaller villages, like Bleadon.

Option 3: Growth based strategy. Group together settlements with capacity for housing sites with a tightly worded criteria-based policy to guide where development will go.

There was a similar level of support for option 3 as option 2 with 7 respondents indicating support for this option. These were mainly from the development industry and the reason for supporting this option was primarily that it was felt it give more flexibility for delivering housing sites. General comments in support of option 3 included:

- Option 3 could provide for greater flexibility but the use of the term “tightly worded” seems to indicate an unwillingness for flexibility on behalf of the council.
- Welcome separate growth based policy to ensure smaller settlements, hamlets, locations within the Green Belt but close to larger settlements do not become unnecessary blighted by restricting all and any development.
- Option 3 allows more flexibility that would help to achieve small scale sustainable infill opportunities on the periphery of Backwell located in the Green Belt and outside the settlement boundary. This would remove the need for 700 homes on the edge of Backwell.
- Support for this option as it presents a positive and pragmatic approach to accommodating growth over the plan period.
- Support for Option 3 as would be favourable to a site in Claverham (Newland Homes)
- Option 3 allows for settlements close to each other and which share services and facilities to provide a focus for new housing development.
- Support Option 3 - Due to the failure of planning policies in the past to plan for the housing needs for North Somerset and the inability of the Council to be able to demonstrate a 5 year land supply, the settlement hierarchy has been completely undermined by development management and appeal decisions. Therefore Options 1 and 2 are unrealistic as they currently don't work.
- Option 3 is more flexible, reduces the possibility of villages stagnating and offers choice and opportunity to accommodate appropriate levels of growth in all settlements.

Reason for not supporting option 3 included:

- Option 3 could lead to more travel between smaller settlements to reach everyday facilities.

Alternative Options

A number of respondents suggested a combination of options primarily a combination of options 2 and 3 whereby villages and hamlets nearby the Service Villages could take some additional level of development, or a combination of options 1 and 2 which would include a new tier but also reassessed the position of all the settlements.

Settlement Boundaries

Qu9: What are your views on the options for revised settlement boundaries?

There was a general level of support for maintaining settlement boundaries and an acceptance that they are a useful planning tool to guide where development should go. Based on the respondents who expressed a specific preference for one of the proposed options, there were 27 comments in support of Option 1 which proposes keeping the policy that allows sites to come forward adjacent to the settlement boundary and 24 comments in support for Option 2 which removes the policy allowing sites to come forward adjacent to the settlement boundary. Those favouring Option 1 were primarily from the development industry or people who had sites to promote, whereas those supporting Option 2 were parish councils or local residents. In terms of overall general comments about settlement boundaries respondents felt that:

- A large number of respondents felt that settlement boundaries needed to be rigorously maintained to avoid villages merging and to preserve the individual character of villages and prevent ad hoc, inappropriate development of greenfield sites/countryside.
- Settlement boundary review should be done alongside a green belt review to ensure that opportunities are not missed and there is a consistent approach to planned future development.
- The current strategy of allowing development adjacent to settlement boundaries is flawed. It offers uncertainty for local communities and should be discontinued.
- Abbott Leigh Parish Council would like a boundary re-drawn to recognise the old village fence. They also feel that the boundary should be re-drawn at Pill and Easton-in-Gordano to include Ham Green. However, they strongly opposed the adjustment of boundaries which would permit major new Green Belt development. Would like boundaries adjust to reflect recent development, retain a boundary but allow sites to come forward adjacent to settlement boundary.
- Clevedon Town Council feel that its boundary could be expanded to incorporate Kenn, or at least expanded up to the M5 barrier with Kenn. There is an anomaly at Land west of Kenn Road, Clevedon where the significant allocation and business park are outside the settlement boundary and not physically attached but merit inclusion within the Clevedon boundary.
- There are suitable small scale infill sites in the village of Portbury, Tickenham, Abbots Leigh which can be accommodated to the benefit of the village.

- Tickenham PC would like the settlement boundary to be removed but would be happy to have some low key development of small dwellings suitable for those wishing to downsize or for younger families.
- Wraxall and Failand are the result of disparate ribbon development but have a strong rural character and it would be difficult to draw settlement boundaries that would be readily accepted by residents. The rural character of these areas should be conserved and remain as 'countryside'.
- Settlement boundaries should not be adjusted where it would result in the loss of green belt. Settlement boundaries should respect neighbouring parishes. Adjusting the settlement boundary to the north of Nailsea would both result in a loss of greenbelt and detrimentally impact on the parish of Wraxall.
- You are just adjusting the settlement boundaries so you can build more houses rather than for the benefit of the communities.
- Settlement boundaries are important to prevent inappropriate development of greenfield sites.
- There should be an option for the removal of boundaries which would work in accordance with option 3 in the settlement hierarchy section of growth led strategy.
- When does 'adjacent' become 'sprawl'?
- Support for revision of settlement boundaries but with a mixture of options 1 and 2 – policy should be adapted to allow growth adjoining the Settlement Boundaries of service villages in the Green Belt to allow small scale growth.
- Settlement boundaries cannot be considered in isolation from other aspects of the plan.
- There is a mix of approaches to settlements within North Somerset's Green Belt – some are washed over, some are inset. A consistent approach would be better moving forward.
- Recent amendments to Policy CS32 have eroded the purpose of settlement boundaries of Service Villages. If rural communities are to be maintained then a rigorous settlement boundary policy should be reinstated and adhered to.
- Settlement boundary should be given to Portbury to allow much needed small scale residential development. This would fit with option 3 of the settlement hierarchy section which removes settlement categories.
- A relaxation of the settlement boundary around Nailsea is necessary to facilitate more appropriate development locations. This would also require a local review of the Green Belt boundary.
- The current approach to Green Belt effectively facilitates the stagnation of those settlements entirely within the green belt by excluding genuine sustainable development opportunities from detailed assessment.
- The 'adjacent to' policy should also apply to infill villages e.g. Claverham.
- Cleeve should be an inset village because, based on para 140 of the NPPF, it does not fit the 'open character' needed for inclusion in the Green Belt. The boundary should then be amended to include the site at No.3 Main road.
- There should be an enabling policy in the JSP to allow for green Belt review to take place at Local Plan level.

- There should be no new sites or settlement boundary reviews in the Green Belt.

Option 1: Adjust settlement boundaries to include new allocations within the boundaries and retain the current policy which allows sites to come forward adjacent to boundary.

This option was preferred by the development industry. Specific comments on this option include:

- Helps meet the governments pro-growth agenda as it allocates site plus allows some flexibility for sites to come forward at a time when there is a significant under supply of housing.
- Provides flexibility going forward which is needed due to the high reliance on large scale SDLs with associated infrastructure and land ownership delivery risks.
- The most flexible options and provides a solution to the 5 year housing land shortfall.
- Would allow for additional flexibility for non-strategic windfall sites to come forward and development adjacent to Service Village boundaries which is sustainable.
- Can lead to speculative applications by developers with disagreement about what is or is not adjacent to a settlement boundary.
- Would provide the widest possible range of sites in terms of size and market location.
- Would allow suitable infill proposals to come forward that would have minimal effect on exiting local communities and the integrity of the wider Green Belt.
- Support for Option 1 but without the size threshold for sites coming forward adjacent to the settlement boundary. Instead there should be a criteria based policy for each proposal that comes forward adjacent to the settlement boundary. Persimmon and Strongvox felt that 25 dwellings adjacent to Service villages is an arbitrary figure.
- Review of settlement boundaries in Portishead should take into account the numerous constraints surrounding the town.

Option 2: Adjust settlement boundaries to include new allocations within the boundaries but remove the current policy which allows sites to come forward adjacent to the boundary.

Option 2 was mainly supported by parish councils and local residents as it was felt that this option gave the most certainty to communities in terms of which housing sites would come forward during the plan period. Comments included:

- A number of parish councils supported this option including Banwell, Backwell, Barrow Gurney, Blagdon, Bleadon, Burrington, Congresbury, Flax Bourton, Long Ashton, Winscombe and Sandford and Wrington.
- Backwell parish council felt that this option provides local communities with a full understanding of the scale and location of growth planned for the local area. BPC agrees with the advantages of this option as expressed in the Issues and Options Document. Providing the Local Plan makes adequate provision for new housing to meet the strategic housing requirement set out in the JSP it will be unnecessary to retain the current flexibility in the policy to allow additional housing beyond the settlement boundary.

- Blagdon parish council feels the current boundary does not include the entire village which leads to some confusion.
- Bleadon parish council feel that they do not need their boundary amended as they have the potential for some small-scale allocations within the existing boundary. The current policy should be amended to ensure that the size of any housing development adjacent to the settlement boundary is limited in number to no more than 10% of the existing homes in the parish (currently circa 500 homes).
- Burrington parish council felt that sites should be identified and boundaries drawn to reflect development opportunities in consultation with local residents and parish councils.
- Congresbury PC favour Option 2 as they feel Option 1 is unfair in that it allows a settlement which has adjusted its boundary to be liable to further growth. The purpose of settlement boundaries is to control growth so maintaining a policy allowing development adjacent is reducing the weight settlement boundaries have.
- Option 2 should be done with community consultation before any sites are allocated.
- Flax Bourton parish council support option 2 as it provides a clear cut policy for a village as to where development will or will not be allowed.
- Option 2 is better as growth should be inherently plan-led.
- Long Ashton parish council prefers options 2 as it would remove uncertainty from the planning process and avoid unwanted speculative applications. Any revision to settlement boundaries needs to be undertaken in conjunction with affected parishes.
- Option 2 is supported by Wessex Water as a plan-led process enables infrastructure to be planned and delivered in a timely and co-ordinated manner.
- Wrington parish council and some residents support option 2, but without new allocations.

Reason for not supporting option 2 included:

- If the council pursue option 2 it is unlikely that the annual windfall target would be met which would impact on the delivery of its annual housing requirement and would have implications for the councils 5r year supply.
- Option 2 is too restrictive which would restrict the flexibility available to the council to bring forward new sites.

Section 4: Garden Villages and New Communities

Garden Villages and new communities (Q10 – Q26)

The bullet points listed below identify some of the key issues raised for each of the Strategic Development Locations. For a comprehensive schedule of responses to the consultation see the [Responses Received to the Issues and Options Consultation \(Jan 2019\)](#).

There was a general comment that the proposals have not yet been confirmed in the JSP and therefore the consultation is premature. Many of the comments centred on the principle of these developments which is being addressed through the JSP.

Banwell Garden Village

- JSP should be confirmed before details are progressed through Local Plan
- Housing at Ashton Vale more compatible with JSP spatial strategy
- Banwell an unsustainable location and viability not established
- Case has not been presented for all alternative scenarios including distributing the housing at the larger settlements by minor local adjustments to the Green Belt
- An up-to-date SFRA is required. Flooding issues need to be prioritised. Development needs to be located on higher ground out of the fluvial floodplain.
- Scale of development will have significant impact on local environment, and AONB. Ecological issues need to be prioritised.
- Scale of development should be capped to avoid adverse ecological issues.
- Vision supported and some support for Garden Village. Banwell is close enough to Weston-super-Mare for new residents to travel to work in Weston by cycling or new public transport services. Meanwhile, Banwell village has long needed a bypass and construction of new houses will contribute to the cost of its construction.
- Vision should better incorporate high quality green infrastructure at all scales
- Also support for a separate settlement.
- Caution that visual appearance is not a twee mock village
- Concern that road infrastructure will not be prioritised over housing and business growth and the upheaval this may cause.
- a new M5 junction would probably be key to the success of a community here.
- Concern over potential impacts upon Congresbury.
- new development should not impact on the character or encroach on the village of Banwell and should be designed to utilise the current road network and promote rail and public transport for commuting
- Increased traffic pressure through Sandford, Churchill and A368. Banwell-Sandford and Churchill Bypass should be considered as a single entity.
- principles will need to address the phasing of delivery in relation to the Weston Villages development to ensure that the development does not undermine the delivery of the existing key regeneration sites

- no significant new employment opportunities in these areas, although some support for new provision. However again, transport infrastructure needs to be prioritised.
- Vitally important that design principles are not watered down due to viability.
- Mixed support for both Alternative Scenarios, and some support for development between M5 and Summer Lane. Constraints to development alternatives noted.

Mendip Spring Garden Village

- Strong objection to the principle of development in this location; conversely some support.
- Impact on AONB
- Impact on local road network and unsuitable narrow local roads. Concern over impact on A38 and A370.
- No employment in the area so proposals will encourage car use. Houses should be built close to jobs. Development would be a commuter village.
- SDL at Long Ashton or the Vale a better option
- Consultation is premature of the JSP being agreed.
- General area suffers from water dispersal problems.
- Significant effects on local environment, and wildlife habitat. There should be a commitment to ecological net gain.
- Impact upon character of existing villages.
- Area has little or no public transport provision
- Loss of agricultural land.
- Desperate need for affordable housing but concerns that houses would not be affordable.
- Concern on flooding from Mendips.

Backwell

- Strong objection to proposal
- Premature in advance of JSP
- Backwell will no longer be a village
- Vast majority will commute to Bristol
- Impact upon agricultural land and wildlife.
- Traffic through Backwell is a real problem now.
- Impact upon local services and facilities.
- Existing roads not suitable in Backwell
- Minimal existing employment
- Flooding affects surrounding area around Nailsea and Backwell
- Supporting transport infrastructure is not affordable.
- Development at the existing larger settlements is more sustainable and more rapidly deliverable than the Garden Village proposals.
- Some support for the vision.
- Impacts upon heritage assets.

Nailsea

- Some support for expansion of Nailsea; some views that homes should be built closer to Bristol
- An alternative of building to the north of Nailsea was suggested, however some comments that this would be unsuitable including due to flood risk, landscape, and ecology. Also, no justification to remove Green Belt to north.
- Development to the south and west would be on some of the most fertile and attractive land that surrounds the town.
- The Plan is premature pending the outcome of the JSP
- Support vision to retain the gap between Nailsea and Backwell to safeguard their separate identities and accommodate attractive and convenient walking and cycling routes to the station
- Tickenham Road unsuitable for traffic.
- Potential for strategic transport route to link through to Lulsgate.
- Strain on existing transport route and public transport
- Ecology impacts particularly on Horseshoe Bats, and particularly from new roads
- Proximity to station was seen as a good attribute, but limited rail capacity for commuters
- Infrastructure improvements are a priority
- A sensitive environmental policy/ strategy is required to take into account air quality, the water environment, sensitive landscapes and habitats.
- Potential impact on Towerhouse Wood
- pressure on the Internal Drainage Board in this area
- Adverse impact on West End. Improvement to more tightly wrapping the development around the edge of Nailsea.

Section 5: Urban Living

Section 5 and Questions 27-32

There was a general level of support for principles expressed in this section concerning the efficient use of land in towns and the use of brownfield sites. 72 responses were received in total. The approach set out in the Weston Town Centre SPD and the issues raised regarding the A370 corridor were also supported. The need to extend the approach to other towns particularly Portishead and Clevedon were commented on. Other issues raised included:

- The need for Masterplanning of specific areas to include design briefs covering height parameters, zones, quantifying housing numbers including affordable housing and flexible approaches to development.
- A placemaking guide should be commissioned to help deliver solutions for urban living and better design guidance is required.
- Highway England supports the concept, but state that JSP mitigation may not be sufficient to accommodate trip generation from the allocation and policies to manage car-ownership and public transport provision required as part of the urban living concept.
- Need for robust evidence to support the additional 1,000 dwellings in Weston-super-Mare. Some comments related to the difficulties in achieving the levels of growth required, or whether the current 40dph target is being met. It was suggested that the urban living and the non-strategic growth quantum should be combined. Also, that brownfield sites be revisited to ensure a supply of affordable housing.
- The 'urban living' figure of 1,000 seems unambitious. Sustainable intensification of Weston Town Centre would be desirable.
- Developers generally were supportive of the efficient use of land but expressed the need for flexibility when setting densities and policies to allow for lower densities where clearly justified or if other Council policies and other considerations genuinely impact the level of viable density achievable.
- Higher densities should be a guide and not used as a tool to prevent development.
- The inter-relationship between density, house size (including any implications from the introduction of optional Nationally Described Space Standards and / or accessible / adaptable homes standards), mix and developable acreage on viability should also be carefully considered.
- Whilst there was support for adjusting density according to accessibility and sensitivity of location there was no overwhelming support for a particular option. Option one was not favoured by some of the villages as they did not support higher densities in villages where vernacular design to maintain and respect the local character is required. A blanket approach was not favoured as regarded as unlikely to provide the wide variety of housing typologies required. It was suggested that there was a need for variety not prescriptive standards and that design should be determined by strategic considerations, local characteristics and housing mix. General support was expressed for options 3 (transport

hubs and service centres and some for option 4 (Master planning) or for a combination of options.

- Weston Town Council expressed concern about too high a density particularly in outer areas of Weston and adjoining parishes.
- Should set up a Rochdale Envelope for the Town Centre. That would guide developers/planners in terms of what is achievable and attract investment to implement/deliver it.
- Sufficient car parking needs to be included based on an assessment of demand
- Ensure urban parks, green spaces and green infrastructure are an essential part of urban living. Recognise there will be increased pressure on existing green spaces.
- Better cycling and mobility vehicle use needs to be included to make towns safer. Better public transport needed.
- Should recognise that community-led development (self-build and custom build) and retirement living can deliver higher densities. Specific plots or % allocations for these types of project should therefore be included within the masterplan framework.
- The Environment Agency were concerned about flood risk in Weston-super-Mare and stated that there should be less vulnerable uses at ground level, or no sleeping accommodation on the ground floor.
- The town centre should be supported by free, but time-limited, parking.
- CS14 (Distribution of new housing) and DM36 (Residential densities) should be combined
- Support urban living in towns as it reduces the pressure on villages.
- Persimmon suggested that an additional 150 units could be provided at Hayward Village and South West Strategic Developments an additional 30 on the site at Oldmixon.
- Urban living decreases rural living and increases flood risk.
- Clarity is sought as to whether minimum densities would apply to Weston Villages.
- Affordable houses close to employment and facilities are needed should consider Dolphin Square and possibly the Sovereign Centre.

Section 6: Employment

Questions 33-37

There were 60 comments relating to the five questions within this policy area, which were largely supportive of the principle of encouraging the delivery of economic growth within the district and particularly at Weston-super-Mare but did raise concerns about the policy mechanisms linking employment delivery to housing growth.

Comments that were made can be summarised within the following eight broad topic areas:

- Employment led delivery – the link between jobs and homes
- Evidence base
- Local jobs
- Allocations
- Transport
- Current and future business needs
- How to attract new businesses to the area
- References to specific sites

Employment led delivery – the link between jobs and homes

Parish Councils and local residents were generally supportive of maintaining a link between the delivery of jobs and homes, although comments were made that this should not restrict affordable housing coming forward. There was one suggestion that the employment led approach should also be applied to other settlements.

The development industry responses, whilst still broadly accepting of the need to deliver employment as well as housing, largely objected to retaining a formula based approach where housing delivery is explicitly linked to job numbers. Reasons for these concerns are:

- Delivering residential first can unlock employment sites that are otherwise undeliverable
- Housing delivery is constrained by this approach, which in turn hinders economic growth
- It would be inappropriate to continue to promote this approach at Weston but not other areas
- The past focus on office jobs is too narrow, this should be reviewed
- A more flexible approach is needed, it would be preferable to dispense with the jobs to homes ratio and look at what is needed on a site by site basis instead

Evidence base

Concerns that it is unclear what is meant by 'economic growth' and this should be defined.

Numerous comments that any future policies (particularly a revised version of SA4) should be based upon the Employment Land Review findings, although there were some queries over the Employment Land Review process.

Suggestion that the Economic Plan should form part of the evidence base.

A few comments queried whether evidence exists to prove that the previous employment led strategy has worked.

Local jobs

General support for ensuring job delivery within Weston-super-Mare to reduce out-commuting or prevent it getting worse, some comments that significantly more jobs are needed than have been planned for previously.

Planning policies should allow and encourage working from home and the provision of local jobs for local people, at local centres as well as on employment sites.

Allocations

Suggestion that more allocations should be made, particularly in Weston but also in adjoining parishes.

Concern that existing allocations shouldn't just be rolled forward, but should instead all be re-assessed.

There could be a risk of affecting land values if too much land is allocated.

Transport

Significant amount of concern that employment growth must be linked to transport infrastructure – both existing and proposed.

Particular references to connectivity around Weston (specifically the A370 and M5) and access to and from Royal Portbury Dock and Bristol Airport.

Suggestions that public transport should also be a key focus.

Current and future business needs

A number of themes came up within the responses, suggesting what current and future business may need, which can be summarised as follows:

- Flexible space and flexible terms
- Access to skilled labour
- Range of premises types should be available
- Modern premises
- Digital connectivity
- Good transport links
- Serviced sites (as opposed to speculative buildings)
- Streamlined planning processes

How to attract new businesses to the area

Suggestions made include:

- Improve the gateway and entrance to Weston-super-Mare and ensure high quality design
- Ensure and promote efficient digital connectivity
- Make sure there are a selection of different types of premises available, particularly affordable units
- Incentivise them by offering discounted rates/taxes, particularly within Weston Town Centre
- Improve local transport routes and improve access to the M5
- Have local schemes in place to train apprentices
- Ensure that sites are available for growing companies
- Encourage businesses to co-locate with other similar uses
- Support the needs of tourism businesses
- Promote the area, effective marketing and branding may help

References to specific employment sites:

- Land west of Kenn Road Clevedon – this existing employment allocation should be reviewed
- Land east of Junction 21 – should be considered for mixed use employment linked to a bypass
- Land east of Clevedon – promoted as a strategic site that can deliver housing and employment
- Locking Parklands employment – suggest that the allocations in this area should be revisited and consolidated
- Land south west of Royal Portbury Dock – the port is a strategically important asset and will require additional land over the plan period

Section 7: Bristol Airport

Q38: What are your thoughts on the four proposed options for a Bristol Airport policy in the new Local Plan 2036? Do you have a preferred option?

There were 56 comments relating to this policy area. A large majority of those who expressed a view on the options supported Option 1: Retaining the existing policy for a northside inset. The airport was seen as having reached a natural limit. Green Belt release was seen as a precedent and as reducing local influence over airport development. Some support for Option 1 was provisional, pending proof of future needs and adequate surface access provision.

Removing only the existing airport area from the Green Belt received no support. Given airport permitted development rights, and the application of very special circumstances, it was not seen as making a difference to the type of development that happens south of the runway.

A small number of respondents supported one of the two options proposing a larger deletion of Green Belt land. These included Bristol Airport and Business West, who welcomed the certainty this would provide for long-term planning. Support also came from promoters of development elsewhere, in the hope that it signals a willingness to reconsider Green Belt generally. Others rejected these two options because there are too many uncertainties associated with airport planning to make such provision. It was argued that if land were to be removed from the Green Belt, the appropriate boundary would need to be tested. Wessex Water expressed concerns over proximity to a sewage treatment works.

Many respondents were concerned by matters other than the four identified options, wanting a strategic, planned approach to:

- rail/rapid transit access
- employee access from surrounding villages
- off-site passenger car parking
- mitigation for biodiversity and public rights of way
- development opportunities close to the airport.

A point often made was that the planning of the airport site should be secondary to resolving surface access issues. Concern was raised that some surface access improvements could damage the environment, for example, mass transit or links to the M5.

Some declined to comment because not enough facts are yet in the public domain. There was a feeling that expansion seems inevitable but with no apparent overall plan available.

Section 7: Transport

Qu39: Are there any other transport issues or challenges that have been missed? How can they be addressed in the Local Plan?

There were 87 comments relating to this policy area. The following themes emerged:

- the I&O document lacks detail and is premature given the studies yet to report;
- the Joint Transport Study will determine transport strategy, confining the Local Plan to the most local elements;
- trips per person may have fallen by 6% but this is a small amount;
- driverless cars could increase trips by making them easier;
- live-work units can reduce commuting – superfast broadband is being rolled-out to support rural economic vitality;
- more traffic makes rural areas less safe for all road users – improve public rights of way network and maximise its accessibility for different kinds of user, introduce traffic calming / lower speed limits, consider the impact on level crossings;
- allowing rural development can enable improvements to, e.g., cycle routes in the vicinity;
- support for walking / cycling but safe routes between villages are needed – aspirations need backing with resources;
- support for public transport, with better linking of homes and facilities, a true network;
- support for park-and-ride but sites in Green Belt would undermine its openness and add to noise and light pollution;
- park-and-ride encourages people to drive towards town instead of seeking alternatives – removes congestion from Bristol by increasing it elsewhere;
- hub parking at stations would draw in traffic – Nailsea & Backwell attracts drivers from a long way west because it is the last parking before Temple Meads, which is why it always fills up;
- stations need improving – Nailsea & Backwell is unusable for some;
- buses are caught in congestion – dedicated-route alternatives may not be feasible within the plan period;
- congestion on the M5 corridor is not only an issue for Weston-super-Mare but also the centre and south of the district and elsewhere – the Local Plan needs to elaborate on the JSP proposals, ensuring that the impacts of development on the strategic road network are not severe;
- there are existing and growing problems at Junction 19 because improvements have not kept pace with development over the past 60 years;
- access for the Port to the motorway and rail networks must be maintained;
- the M5 needs a new northbound service area and a second Avon crossing, which could be road/rail, making it an alternative to using the Portishead branch for passenger trains;
- contradictory statements are being made about Junction 21A and Churchill Gate improvements;
- a Junction 21 relief road offers an interim solution to enable development to continue;
- improved access to the airport should precede any expansion;

- airport parking needs a comprehensive strategy to address nuisance suffered by surrounding communities;
- development proposals – airport, housing – will increase emissions and the cumulative impact on road traffic levels has not been considered;
- little regard has been shown for climate change;
- development should be as close as possible to Bristol to reduce commuting distances and facilitate walking / cycling – if the SDLs proceed, where will residents work?
- a balance of uses, not just housing, is needed, and more attention to good design;
- parking standards hold back aspirations for higher density housing but conversely there is dissatisfaction with recent developments providing less than is needed;
- mitigation proposed is inadequate – South Bristol Link traffic is far greater than forecast;
- there is scepticism that SDL mitigation will receive the necessary funding;
- the timetable for SDL mitigation is over-ambitious or inappropriate, e.g. two rail crossings required, works placed in different phases need to come forward together;
- despite the mitigation, bottlenecks would remain and worsen, e.g. A370 through Flax Bourton, B3130 through Tickenham;
- SDLs should not be developed without mitigation in place, but delay would impact on housing build-out rates, taking them beyond 2036;
- if reliance on SDLs threatens housing delivery, ready-to-go alternative sites based around existing infrastructure and public transport, or requiring less extensive new works, would provide resilience, e.g. Ashton Vale or North of Nailsea;
- new roads could severely affect ecologically sensitive areas, through land take, barrier effects, air pollution, light and noise – also need to consider SSSI hydrology and ensure floodplain connectivity and avoid impacts on the special qualities of the Mendip Hills AONB;
- public health concerns include air pollution and noise from transport;
- new roads promote further traffic growth;
- rail connections to Bristol Airport would despoil the Green Belt;
- there is concern at potential impacts on existing properties – safeguarding of transport schemes needs proper evidence.

Section 9: Potential New Policy Areas

There were 382 comments submitted on this section of the plan with the most commented on topic area being Affordable Housing which had 45 comments. The comments on each topic area are summarised below:

Self-Build housing

Qu40: Are there any other options for how the Local Plan can deliver self-build and custom housing schemes?

There were 16 comments relating to this policy area that were generally supportive facilitating self-build homes, although there was a clear division between developers and other interested parties on the best way to achieve this. Comments included:

- The development industry generally consider that a policy requiring a proportion of plots on large sites could be unworkable and may also not satisfy need as people who wish to build their own home would usually prefer more bespoke rural locations. They largely responded that specific allocations for self-build would be preferred.
- Parish Council and resident responses were generally positive, supporting the principle of a proportion policy and welcoming a mix of housing types, although some concerns were raised that the level of need is unknown and it is unlikely that self-build properties will make a significant contribution to housing needs overall.
- A few comments mentioned the self-build register and queried whether this is reflective of actual need for self-build plots, there was concern from the development industry that the register can over inflate actual need and that the register statistics should be supplemented with secondary data sources. A suggestion was made that the register should be published so that local builders can contact those registered to advise them of opportunities.
- Other options suggested referred to encouraging self-build by releasing small sites beyond settlement boundaries, offering preferential treatment to custom builders wanting to bring forward non-allocated sites and incorporating community led schemes such as co-housing in to any policy.

Affordable Housing

Qu41: Do you have any views on the review of affordable housing policies?

There were 45 comments relating to this question. There were a number of comments relating to how a new affordable housing policy should reflect the new definition as set out in the NPPF (2018) and that affordable housing should on be required on sites of 10 or more houses in line with the NPPF. There were also a number of comments about the need for affordable housing in villages and rural areas, but this should be specifically for local people. A summary of the comments is listed below

- Affordable housing is needed in rural areas. The council should allocate land specifically for entry-level exception sites.

- The Pill and Easton-in-Gordano and Abbotts Leigh survey for their Neighbourhood Development Plan has identified a need for affordable housing in the neighbourhood plan area.
- Affordable housing targets should be realistic, not aspirational and based on a robust assessment of viability.
- Concern that the current target is not being met and therefore a higher target would be unachievable.
- The 35% minimum target set out in the JSP is supported (2) and should be followed through in the Local Plan policy.
- Provision of affordable housing should be commensurate with local need.
- There should be more guarantee that developers will deliver the required number of affordable homes, and the number agreed through planning permission. Developers should not be allowed to reduce the number of affordable home once planning permission has been granted unless there are very exceptional unforeseen circumstance on site affecting the viability.
- There seems to be an acceptance that affordable housing targets will not be met due to viability – this should be challenged.
- Developers should have to provide more affordable housing.
- Affordable housing should be provided at villages and there should be a local connection criteria so affordable housing is for local people.
- The new policy should only apply to 10 or more dwellings to be compliant with the NPPF.
- The council definition of affordable housing should be updated to reflect the revised NPPF and include starter homes, discounted market sell housing and other affordable routes to home ownership.
- Need a revised SHMA to which takes into account the new NPPF definition of affordable housing.
- The level of affordable housing should be determined through the viability assessment of the Local Plan.
- Current affordable housing target is achievable across the authority area.
- The JSP requirement for 35% on sites of 5 or more will be difficult to deliver in Weston due to viability issues. There is also the risk that it would “squeeze out” small and medium housebuilders if the affordable housing requirement is too high and the threshold too low. It is also untested at examination and carries very little weight
- Questioning the reliability/accuracy of viability assessments (HBF)
- Development should be 90% affordable to meet local need across the district.
- Information is not available to make an informed decision – what is the cost of an affordable home?
- The council should build affordable homes
- A full review of affordable housing is supported.
- Need a balance of housing mix of size and tenure
- Affordable housing policies should consider the affordability of public and other transport options from their location to major areas of employment.

- A Land Value Tax could deliver a more reliable route to affordable housing.
- Affordable properties should have this status in perpetuity.

Woodland Neighbourhoods

Qu42: Do you have any views on our intended approach to Woodland Neighbourhoods?

There were 17 comments relating to this question with comments relating to the protection of trees, impact on the Green Belt and general character of the landscape, and comments as to whether this policy should only apply to the two areas identified. Comments included:

- It would be inappropriate for this policy to apply to only these two areas, as there are many areas within North Somerset where mature landscaping limits the external effect of such development on the openness of the Green Belt.
- Protection of trees is seen as critical and extensions or developments which would harm protected trees or the wildlife within Woodlands should not be allowed.
- Concern over equality implications of such a policy which seems to favour people who live in large houses in large grounds, over other residents in the Green Belt who may have smaller properties.
- Where Woodland Neighbourhoods are located in consultation bands A to C, as identified in the North Somerset & Mendip Bats Special Area of Conservation (SAC) Guidance on Development SPD, there is potential for even modest development to impact on horseshoe bats, we would therefore expect this to be a consideration, which ever approach is taken forward (Natural England).
- Important that the openness of the Green Belt is protected and there is no visual impact from larger extensions.
- Important to retain the Woodland Character and stop loss of trees.
- Some agreement that a more relaxed approach should be taken to extensions in Woodland Neighbourhoods.
- Planning policy should be consistent across the district.
- Clarification sought on what is meant by “a more relaxed approach” and the proposed acceptable size of extensions in these areas.

Health Impact Assessments

Qu43: Do you have any views on our intended approach to Health Impact Assessments?

There were 23 comments relating to this question with comments particularly in terms of when Health Impact Assessments should be required and what they should cover. Comments included:

- Consideration needs to be given to the elderly given the aging population and the extended life expectancies.
- General concern about how the amount of proposed development will impact on access to health care facilities.

- HIA's should be considered at an early stage in the planning process and practical actions/mitigations identified early on.
- The impact on health from Bristol airport was raised by a number of respondents in relation to noise with the following report being referenced:
<https://www.gov.uk/government/publications/chief-medical-officer-annual-report-2017-health-impacts-of-all-pollution-what-do-we-know>
- HIA's should be required where there are several proposed developments in the same area to assess the cumulative effect, particularly in relation to air pollution.
- HIAs should only be required where a significant impact on the health and wellbeing of a local population has been identified.
- Where developments are in accordance with the Local Plan HIA's should not be required as impacts on health and wellbeing should have been considered and addressed during the plan making process.
- Any policy needs to include a specific guidance to what will be required in an HIA and what size scheme they will be required on.
- They should not be an unnecessarily onerous requirement and should be proportionate to the size of the development proposed.
- HIA's are important to protect and improve community health.
- Green infrastructure and access to it are important parts of health and well-being.

Climate Change

Qu44: Should new policy aspire to zero carbon development?

34 responses were received, 18 of which were fully supportive of new policy to aspire to zero carbon, 6 responses stated that it was not appropriate/or achievable to aspire to zero carbon development and 8 comments did not directly answer the question but provided some feedback. A summary of the responses:

- Agree and strongly support
- Viability will need to be a key consideration
- Net zero is an unachievable goal, some realistic objectives should be set out in policy
- Need to adopt a flexible and pragmatic approach to suit individual circumstances
- This is set out in national policy via building regulations and national technical standards
- Where zero carbon can't be met should be low net carbon
- Proposed garden village locations are at odds with such an aspiration and do not fit with the environmental issues of carbon reduction – to reduce emissions by 50% by 2030 to limit global temperature rise
- Recommend that also considers the role of development in climate change adaptation and resilience, including water efficiency and SuDS
- New communities should have a solar farm attached to it
- New homes and especially commercial buildings should incorporate renewable and low carbon technology

- Without this the council is unlikely to meet its carbon reduction target
- The role of Community-Led Housing should not be underestimated, schemes demonstrate innovation is possible
- May be overly prescriptive, any such requirement for a specific standard wider than mandatory standard can only be expressed as an aspiration
- Any local requirement should reflect governments policy for national technical standards/ building regulations
- Starting point for energy reduction should be energy hierarchy of energy efficiency, renewable energy and finally low carbon energy
- Climate change should be embedded within the entire local plan
- Any requirement should reflect NPPF paragraph 150b with emissions reduced by location, orientation and design.

Qu45: Should new policy require a significant increase in use of renewable and low carbon energy generation?

27 comments were received, 16 of which were supportive, 3 were not supportive and 5 did not directly answer the question. A summary of responses:

- All new housing should increase renewable and low carbon energy generation
- If dwellings built to Passivhaus energy generation requirement should be low
- New homes and commercial buildings should (be mandatory) to incorporate solar PV
- Particularly solar PV in construction of social and affordable housing
- May compromise the delivery of other required infrastructure
- Not considered any increase is in accordance with national policy
- Large scale housing development needs to include solar and electric charging points
- Any requirement should reflect NPPF paragraph 150b with emissions reduced by location, orientation and design
- Increased to 20 and 40% would be preferable
- Support in appropriate places, urban roof space before solar farms on ecologically or agriculturally important land

Qu46: Should local plan identify suitable land for large scale renewable energy generation to support new development?

22 comments were received, 11 of which were supportive, 5 were not supportive and 4 did not directly answer the question. A summary of responses:

- Should allocate to support Strategic Development Location, is essential to make them truly sustainable, incorporate into viability assessment
- Unlikely that there are many suitable areas without environmental drawbacks
- Support appropriate/ small scale renewables in the right locations - roofs

- All development should incorporate renewables – wind turbines, solar, heat pumps
- Renewable energy can have negative as well as positive impacts on wildlife, landscape and people’s enjoyment of the environment
- Local plan presents an opportunity to identify where technologies would best be accommodated
- Integrated renewables/ solar tiles should be mandatory to make them self-sufficient
- Not suitable on green belt/ AONB or good agricultural land with significant land use and visual impacts

Qu47: Where a new policy sets a % reduction in carbon emissions, if this cannot be met on-site, should a mechanism be introduced to collect off-site carbon emission payments?

19 comments were received, 8 of which were supportive, 5 of which were not supportive and 4 did not state a clear preference. A summary of responses:

- Would be difficult to measure and police, achievable onsite targets should be set in first instance
- Not payments but a carbon balancing scheme
- Any scheme should be verifiable and local and dealt with on their merits
- Developers should respect required carbon limits within the development
- Better to have an incentive rather than a punitive measure
- This will not reduce carbon emissions – will offer an opt-out opportunity
- Need greater consideration of impacts that climate change may bring
- Care will be required in application of this to retirement housing to ensure do not compromise viability of development

Flood Risk

Qu48: Do you have any views on our intended approach to flood risk?

There were 33 comments relating to this policy area. Some respondents misunderstood the aim of the proposed approach, which is to ease development within existing urban areas, for which there is higher-tier policy support. They took it to mean that land with the same risk of flooding around the towns could also be acceptable for development.

Several respondents considered that any relaxation of flood risk constraints would be irresponsible at a time of climate change and could even be unsound. Others questioned the capacity of existing infrastructure to take additional flows: sewer flood risk information should be taken into account. Natural environment bodies advocated the use of upstream, multi-functional green infrastructure to reduce flood risk while also providing other benefits.

The more flexible approach proposed was supported by those with a development interest in higher-risk areas, but opposed by those with sites elsewhere, who considered that flood risk should be a more inflexible constraint than, for example, Green Belt.

It was pointed out that a distinction between towns and villages based on priorities for flood defence is false if they are protected by the same defences. This applies to most settlements on low-lying land if the risk is solely tidal. Extension of the proposed approach to cover smaller settlements was advocated in order to provide more options for non-strategic growth. Parish councils were generally content that their villages should continue to be excluded.

Development on previously developed land in the countryside

Q49. Do you have any views on our intended approach to development on previously developed land in the countryside? What type of sites may be suitable for residential redevelopment?

There were 25 comments relating to this question with the majority of respondents supporting the approach to broaden the types of uses allowed on previously developed land in the countryside to include community uses. Some supported allowing residential development on PDL in the countryside if it was in sustainable locations, and others felt that a new policy should be much more permissive allowing a range of uses, including residential, to maximise the development of brownfield land. Comments are summarised below:

- Residential development on previously developed land in the countryside should only be allowed where transport infrastructure exists, and it is in sustainable locations.
- Brownfield development should be encouraged.
- There may be many suitable residential opportunities on PDL in the countryside and a policy which is more supportive of this would be welcomed.
- Policy needs to be flexible enough for each site to be decided on its merits for the suitability for residential use.
- The current policy of not allowing uses other than employment on PDL in the countryside has discouraged investment and left sites vacant and neglected.
- Previously developed land has ecological value, and this should be considered in terms of any development on PDL.
- A number of respondents objected to allowing residential development on PDL as it was felt it would lead to further erosion of the countryside. However, other uses such as employment or community uses are supported.
- Previously developed land should be allowed to be redeveloped for all alternative uses subject to the usual development control criteria.
- Previously developed land in the countryside should only be developed for residential uses if it is by a Community Lead Housing Group.
- Concern over the use of sporting facilities in the Green Belt which are no longer required being labelled as PDL to try and obtain planning permission for residential development.

Holiday accommodation in the countryside

Qu50: Do you have any views on the conversion of holiday accommodation to residential use in the countryside? What approach should future policies take?

There were 15 comments relating to this question which varied in terms of the responses. Comments included:

- The policy should encourage live/work units instead of conversion to solely residential as it would provide rural economic activity.
- Policy must prevent the incremental expansion of the number of buildings in isolated rural locations.
- The policy should be less restrictive as change of use of holiday accommodation to residential would contribute to the significant housing shortage that currently exists.
- The policy should be more restrictive, and conditions attached to planning permissions more stringent.
- The current policy should not be changed.
- Change of use to residential should have to demonstrate that the infrastructure for permanent residential use is in place.
- Policy DM57 should be more flexible to enhance rural business and tourism.
- Change of use is acceptable as long as the scale is appropriate.
- The re-use of isolated buildings should be encouraged for rural and agricultural workers.

Minerals

Qu51: Do you have any views on our approach to minerals?

There were 14 comments relating to this question with most responses advocating either: keeping existing local plan policy on minerals development strong or strengthening it to prevent/mitigate for adverse impacts (4 responses), opposing hydraulic fracturing (fracking) (5), or opposing expansion of /extensions to existing mineral workings (2 responses).

One respondent felt that it was difficult to comment without more information on possible fracking and mineral extraction. Another who opposed fracking in North Somerset also questioned why there has been no local information on what this may entail in communities, and queried how the Local Plan addresses the fracking issue.

Amongst town and parish council responses, Long Ashton PC felt that the overall policy on minerals should remain unchanged, but the local impact must be more effectively monitored and infrastructure strengthened to facilitate the movement of extracted materials. Portishead Town Council assumed that there will be no minerals proposals in or near Portishead.

The Coal Authority said that any eventual site allocations can be assessed against Coal Authority data such as on coal resources to ensure any potential sterilisation effects are properly considered. They added that development can usefully remove hazards from former mining activities.

Electric Vehicle Charging Points

Qu52: What are your views on our proposed policy approach to electric vehicle charging points?

There were 24 comments relating to this policy area and there was a general level of support for the inclusion of a policy that requires provision for charging of electric vehicles. Most of the

comments were relating to the implementation and timing of such a policy and the impact it might have on viability and the delivery residential development. Comments included:

- The requirement for electric vehicle charging points must be part of a wider comprehensive transport strategy.
- A few comments stated support for the National Infrastructure Assessment July 2018 by the National Infrastructure Commission that Local Authorities should be preparing for 100 per cent electric vehicle sales by 2030. This would include local authorities working with charge point providers to allocate 5 per cent of their parking spaces (including on-street) by 2020 and 20 per cent by 2025 which may be converted to electric vehicle charge points. This should also happen at Bristol Airport.
- Concerns regarding the capacity on the existing electricity network and the level and type of charging points that can be accommodated. Suggestion that the Council will need to engage with electricity suppliers to determine the capacity of the network to accommodate electric vehicle charging points and any requirements to reinforce existing cables and sub-stations.
- Concerns that the cost of providing electric charging points may impact on the viability of housing schemes and in turn impact on housing delivery, particularly in terms of the type of charging point that may be required as some are more expensive than other, and the proportion required on site. Suggestion that it is necessary to establish the costs of such infrastructure and take these into account in considering the viability of the plan.
- A Local Plan policy maybe a bit premature as a national standardised approach may be implemented through building regulations in the future. The council should await the outcome of the Department of Transport's consultation which is looking into this matter.
- There is no prevailing form of technology associated to electric vehicle charging points at present. Any policy should be sufficiently flexible to deal with changes to emerging technologies and practices as this is an area that is still evolving.
- Consideration should also be given for charging provision for existing properties.

Green Infrastructure

Qu53: Are there any other policy areas you feel need to be considered – either new policies, or amendments to an existing policy?

There were 31 comments relating to this policy area. The great majority were judged to support the concept of green infrastructure (GI) and its protection/enhancement/provision.

However, one respondent stressed the need to ensure that land being selected actually does contribute to the purposes of GI and the need for incentives to improve the land for ecological purposes. (They opposed sterilisation of a particular land parcel as GI).

Persimmon Homes Severn Valley felt that an approach to GI in the Local Plan, and to environmental and ecological mitigation, will need to accord with recent European Court of Justice Rulings and emerging government guidance, (including government consultation on a single consistent national approach to treatment of net gain for biodiversity).

There was much support for a strategic solution that would integrate and thus enhance mitigation across SDLs (Avon Wildlife Trust, Long Ashton Paris Council, Natural England (NE), West of England Nature Partnership). Wessex Water supported the indicated approach, with catchment based water management etc.

NE advised that sufficient evidence should be obtained to inform site allocations and underpin the strategic mitigation solutions for bats for the SDLs, and for mitigating/ managing increased recreational pressure on European sites and SSSIs.

There was a degree of support for preparation of a WoE GI Plan to support the JSP; (from The National Trust, Natural England and Mendip Hills AoNB unit).

There was a degree of support for creation of a broad ecological zone, (Avon Wildlife Trust and WoE Nature Partnership) while another respondent advocated an ecological zone for Bleadon.

There were a number of responses from Town and Parish Councils, with support for protection of existing green spaces first (Blagdon); protection of habitats (Bleadon), creation of species rich wildlife corridors (Bleadon), and securing of management/maintenance for GI through planning conditions (Nailsea Town Council). Wrington PC advocated enhancing existing green ecology rather than trying to mitigate impacts of development.

There were some references to Natural Capital. WoE Nature Partnership noted the lack of clearly developed funding mechanisms to enable delivery/ long term gains in natural capital. Wraxhall and Failand PC would accept a Natural Capital approach to parks and gardens, but saw possible difficulty applying it to lightly managed green space.

NE and the Woodland Trust advocate achieving net gain for biodiversity through the planning process; NE supports use of the Defra biodiversity metric to help quantify this.

Other Policy Areas

Q54. Are there any other policy areas you feel need to be considered – either new policies, or amendments to an existing policy.

There were 37 responses to this question with a range of topic areas where respondents felt that policies should be amended or that new policies should be introduced. There were a number of comments relating to the delivery of different types of housing such as homes for the elderly, community-led housing and re-use of empty homes, as well as a comment about the need to provide a genuine mix of housing types and tenures. A summary of the comments is set out below:

- **Housing for the elderly:** The SHMA indicates a need for 4,600 homes for older people with varying levels of support. The North Somerset Local Plan needs to contain clear and specific policies that encourage the delivery of specialist forms of accommodation for the growing elderly population. A flexible policy is needed to allow development of such schemes outside settlement boundaries.
- **Education:** Land for specialist and mainstream education should be allocated.

- **Live-work units:** A policy specifically to encourage live-work units should be included in the Plan.
- **Watercourses:** A policy that provides a joined-up approach to development involving watercourses should be included.
- **Trees and the natural environment:** Greater emphasis on the importance of protecting and enhancing the natural environment, particularly in terms of woods and trees, particularly irreplaceable ancient woodland, aged and veteran trees. Also need to look at increasing canopy cover by introducing trees into new developments.
- **Climate:** All policies should consider how they are consistent with the fifth carbon budget 2028-2032. North Somerset Council should publish as detailed carbon action plan explaining how carbon emissions will be reduced.
- **Transport:** A more co-ordinated joined up approach to transport.
- **Gardens:** A policy is needed to prevent people tarmacking their gardens and this results in loss of shade/vegetation/habitats for wildlife
- **Empty homes:** A policy in the new Local Plan is needed in line with the WECA authorities.
- **Community-Led Housing:** A new policy recognising the multiple benefits that CLH can bring to an area and setting out mechanisms through which CLH will be supported and encouraged within North Somerset.
- **Environment agency:** Numerous comments from the Environment Agency on issues such as flood defences, groundwater source protection, protection of otters and other flora and fauna and that the Local Plan should identify and ensure delivery of an Environmental Net Gain approach.
- **Review Policy DM57:** *Policy DM57: Conversion, reuse and new build for visitor accommodation in the countryside* in the Development Management Plan (July 2016) is overly restrictive. A less restrictive approach whereby the merits of each case is considered individually, would support greater enhancement of leisure and recreation facilities which would contribute to the rural economy.
- **Review Policy SA7:** A review of the Strategic Gaps policy should be undertaken for the new plan period.
- **Employment:** A commercially evidenced review of the employment allocations should be carried out. A robust policy to protect employment land is needed as existing employment sites and allocations are often lost to residential development.
- **Access to sports facilities and encouraging active lifestyles:** Sport England made numerous comments particularly emphasising the importance of providing good quality, easily accessible playing pitches and sports facilities as part of any new major housing development and the importance of protecting existing facilities. Also the importance of ensuring active lifestyles are encouraged through the design of new developments e.g. easily accessible, usable cycle ways, safe walking routes, access to parks and open space etc.
- **Heritage:** A Heritage Topic Paper should be prepared setting out the issues, opportunities, risks and challenges facing North Somerset's historic environment and how an appropriate response could provide a positive proactive strategy for the conservation of the historic environment, including assets most at risk (Historic England).

- **Crime:** Liaison with Avon and North Somerset Constabulary will be required to ensure appropriate designing out crime measures are incorporated at the earliest possible stages.
- **Access:** All the new walking/cycling paths which are mentioned in the document should become multi-user paths.
- **Nationally Described Space Standards (NDSS):** There should not be a policy requiring the NDSS for market housing (as is currently the case with DM42). Requiring NDSS for market housing has implications for the affordability and deliverability of houses.
- **Extensions and annexes:** The plan does not give any consideration to the effect on housing capacity of the construction of extensions and annexes. These local developments must make a considerable contribution to the effective number of “homes”, and their effects should be taken into account.
- **Housing mix:** Need a policy which delivers a genuine mix of housing type and tenure.
- **Sustainable Drainage Systems:** Policy needs to required consideration/inclusion of SuDs in new development at pre-application stage.
- **Sewage Treatment:** Development should be restricted around sewage treatment works. Proposed new development management policy wording suggested by Wessex Water.

Sites submitted through the Issues and Options Consultation.

There were 60 sites submitted through the Issues and Options consultation which are set out in the schedule below. Of these sites 23 were new sites that hadn't been submitted in previous call for sites and haven't been assessed through the SHLAA process. The third column of the below table identifies the sites which are new sites. All the new sites have been mapped and given a SHLAA reference number and will now be assessed through the SHLAA process. All the sites can be viewed via our [online mapping system](#).

Site name	Size (ha)	Issues and Options SHLAA 2018 site (if yes include site ref) and notes on any revision	Auto-generated SHLAA ref - to be used as SHLAA referencing.
Land north of Sandford	70.3	New site	HE18587, 588 & 589
Land at Summer Lane, Banwell	2.91	New site	HE18592
Laurel Farm, Banwell	12.2	New site	HE18593
Land to the west of Wyndhurst Farm, Langford	3.5	New site	HE18590
Land east of Stock Lane, Langford	55	New site	HE18598
Land at proposed Nailsea SDL	4.7	New site	HE18591
Manor Farm, Congresbury	4	New site	HE18597
Park Farm, Banwell SDL	1.3	New site	HE18594
Land south of Englishcombe Road	9.5	New site	HE18599
Stowey Road, Yatton	4	HE18179 – same site.	HE18179
Land off Colliters Way, Highridge	7.0	Part of larger HE18286. Latter now revised to create two separate records	HE18615
Land north of Green Hill Rd, Sandford	2.7	HE18344 revised site boundary	HE18344
Land to the east of Portbury	6.3	HE18157 now extended as per Issues and Options consultation submission	HE18157

Site name	Size (ha)	Issues and Options SHLAA 2018 site (if yes include site ref) and notes on any revision	Auto-generated SHLAA ref - to be used as SHLAA referencing.
Blackmoor Farm, Langford	1	New site	HE18616
The Vale, south west Bristol	290	HE18110 - revised boundary to reflect submission at Issues and Options consultation	HE18110
Land south of Greenhill Road, Sandford	1.9	New site	HE18617
Farleigh Fields, Backwell	21	HE18212 – same site	HE18212
Court House Farm, Plummers Hill	8.9	HE186 – Revised boundary	HE186
Land at Court Farm, Winford	0.6	New site	HE18618
Land at Dinghurst	2.2	HE1889	HE1889
Mill Lane Portbury	0.8	New site	HE18619
Land north of Rhodyate Road, Cleeve	0.4	New site	HE18620
Land at proposed Backwell SDL	43	Site variants submitted throughout JSP process. Submission boundary slightly refined through Issues & Options submission.	HE18595
Land off Sand Road, Kewstoke	42.6	HE18245 - existing site - same boundary	HE18245
Land east of J21, WSM	117	He18147 - existing site, revised boundary. As per submission, land north of A370 now added to record HE18147, and accordingly removed from HE18126.	HE18147

Site name	Size (ha)	Issues and Options SHLAA 2018 site (if yes include site ref) and notes on any revision	Auto-generated SHLAA ref - to be used as SHLAA referencing.
Land at Lynchmead Farm, Ebdon Road, WSM	10.6	HE18127 - This existing SHLAA record covered a much larger site as sites were combined to make larger assessment sites. Now reduced to reflect this submission that was also submitted through JSP process.	HE18623
St Georges, WSM	2.5	Site part of larger HE18119 - now reduced to reflect this submission.	HE18624
Manor Farm, Bourton	45.9	HE18119 - This Issues and Options consultation submission is much reduced from the existing SHLAA record. Site amended accordingly.	HE18119
Land at Ebdon Road, WSM	0.9	HE18127 - This existing SHLAA record covered a much larger site as sites were combined to make larger assessment sites. Now reduced to reflect this submission that was also submitted through JSP process.	HE18626
William Daw Close, Banwell	2.82	HE18358 - resubmission of existing SHLAA site	HE18358
Rodney Road, Backwell	-	Site forms part of larger HE18595. Separate submission for this part. For SHLAA purposes no separate GIS record is created.	HE18595 (part of)

Site name	Size (ha)	Issues and Options SHLAA 2018 site (if yes include site ref) and notes on any revision	Auto-generated SHLAA ref - to be used as SHLAA referencing.
Chapel Pill	195.9	Site formed part of larger site record HE1815. Now reduced to create two separate records.	HE18627
North-west of Portbury	1.7	New site	HE18628
Pill Green, Easton-in-Gordano	C.54	HE1815- revised site boundary reflecting separation of Pill Green and Chapel Pill.	HE1815
UTAS site, Claverham	5.6	HE1873 - no boundary change	HE1873
Land north of Nailsea	25.2	HE18136 - no boundary change	HE18136
Land to east of Portishead	36.2	New site comprised of three existing records: HE18221, 18222, & 18272. Only HE18222 retained and amended to take in other two areas. HE18221 and 272 deleted.	HE18222
Black Rock, Portishead	8.6	HE18124 - no boundary change	HE18124
Land south of Langford	7.5	HE18122 - existing site and revised boundary removing field parcels on the southern boundary of the site.	HE18122
Land south east of Langford	2.6	HE18196 - existing site, revised boundary.	HE18196
Land at Conygar Close, Clevedon	3.5	HE18328 - existing site	HE18328

Site name	Size (ha)	Issues and Options SHLAA 2018 site (if yes include site ref) and notes on any revision	Auto-generated SHLAA ref - to be used as SHLAA referencing.
Land between Flax Bourton and Long Ashton	3.6	HE18278 - existing site with amended boundary to remove smaller separate parcel to east (previously submitted together through JSP process).	HE18278
Trenchard Way, west of M5, WSM	6.1	HE18409 - revised site area to take in this submission.	HE18409
Land between Mayfield Farm and Locking	0.8	HE1837 - existing site	HE1837
Land at Knightcott Road, Banwell	1.3	New site	HE18634
Land north of North Weston, Portishead	4.5	HE18133 - revised boundary with effect of reduced site area.	HE18133
Dark Lane, Backwell	3.7	Existing site HE18141, but existing site was larger including field to west. Separate shape created to reflect this Issues and Options consultation submission and existing site HE18141 revised accordingly.	HE18633
Land south of Knightcott Road, Banwell	3.5	HE1898 - existing site	HE1898
Land at Elm Grove Nursery, Locking	4.4	HE187 - existing site	HE187
Land south of Wood Hill Congresbury	6.3	HE18177 - existing site but enlarged to include land to east.	HE18177
Land south of Bristol Road, Portishead	2.9	HE18292 - existing site	HE18292
Land at Cleeve	1.8	HE18201 - existing site	HE18201
West of Wolvershill Road, Banwell	3.2	New site - Site was submitted previously but not in JSP or most recent Local Plan CFS.	HE18632

Site name	Size (ha)	Issues and Options SHLAA 2018 site (if yes include site ref) and notes on any revision	Auto-generated SHLAA ref - to be used as SHLAA referencing.
Land north of Oldmixon Road	17.2	Existing site.	HE18631
Tower Farm, south of Tower Road, Portishead	27.9	HE1868 - same site	HE1868
Land at Chestnut Farm (Area 1), Yatton	0.45	HE18425 - same site	HE18425
Land at Chestnut Farm (Area 2), Yatton	0.84	New site	HE18630
Land at Bath Road, Langford	0.49	New site	HE18629
West of Brinsea Road, Congresbury	3.8	HE18306 - revised site boundary including further land to the south of the site.	HE18306
Land at proposed Banwell SDL	C.98	New site	HE18607
Land at proposed Mendip Spring SDL	C.145	General area submitted through Issues and Options consultation. Due to nature of site submission a definitive site boundary cannot be determined. However, the general area shown on the mapping reflects the submitted area and will be subject to review and refinement going forward.	HE18635

Next Steps

All of the feedback we have received during the Issues and Options consultation will be carefully considered as we progress to the next stage of the plan-making process. We intend to produce a Draft Local Plan for consultation in Autumn 2019. This document will contain draft policies and proposed allocations. The Local Plan timetable will be dependent on progress with the new Joint Spatial Plan, which is expected to be considered at examination hearings Summer 2019. The Joint Spatial Plan will provide the new strategic planning context up to 2036.