
Site Allocations Plan - Publication Version (October 2016) Schedule of Comments Received

Content

Consultation Arrangements	p.5
Introduction	p.8
Policy Context	p.13
Evidence Base	p.21
Policy SA1: Housing Allocations	p.34
Policy SA2: Settlement Boundaries	p.55
Policy SA3: Mixed Use Allocations	p.62
Policy SA4: Employment Allocations	p.65
Policy SA5: Safeguarded Employment Sites	p.74
Policy SA6: Retention of Economic Uses	p.76
Policy SA7: Local Green Space	p.78
Policy SA8: Undesignated Green Space	p.85
Policy SA9: Strategic Gaps	p.87
Policy SA10: Community Use Allocation	p.101
Policy SA12: A370 Corridor into Weston-super-Mare	p.106
Schedule 1: Proposed Housing Sites	p.108
Weston-super-Mare	p.108
Winterstoke Village	p.108
Parklands Village	p.110
Westacres Caravan Park	p.111
Orchard House Ebdon Road	p.112
Land to rear of Locking Road	p.113
Walliscote Place	p.114
Dolphin Square	p.116
Land to the west of Winterstoke Road	p.117
Land to the north of the A370, Summer Lane	p.119
Bridge Farm, Bristol Road	p.120
Bimbeck Pier	p.121
Gas works, Winterstoke Road	p.123
Nightingale Close, Mead Vale	p.124
South of Herluin Way, Avoncrest Site	p.125
Former Bournville School Site, Selworthy Road	p.126
Former Sweat FA site, Winterstoke Road	p.127

Station Gateway	p.128
Land at Bridgewater Road	p.129
Total for Weston-super-Mare	p.130
Clevedon	p.132
North of Churchill Avenue	p.132
Millcross Site	p.133
Total for Clevedon	p.134
Nailsea	p.135
Trendlewood Way	p.135
Police Station	p.154
West of Engine Lane	p.156
Land south of The Uplands	p.210
Land at North West Nailsea	p.220
Total for Nailsea	p.231
Portishead	p.241
Severn Paper Mill	p.241
South West of Severn Paper Mill	p.242
Old Mill Road	p.244
Total for Portishead	p.332
Service Villages	p.333
Land to the east and west of Weberham Lane, Yatton	p.333
Oxford Plasma, Yatton	p.334
Arnolds Way, Yatton Phase 1	p.335
Yatton Station	p.336
Moor Lane, Backwell	p.337
Cobthorn Way, Congresbury	p.338
Venus Street, Congresbury	p.339
Land at North End, Yatton	p.340
Arnolds Way, Yatton Phase 2	p.343
Land to the east of Wolvershill Road, Banwell	p.344
Moor Road, Yatton	p.345
Total for Service Villages	p.362
Infill Villages	p.363
Bleadon Quarry, Bleadon	p.363
Total for Infill Villages	p.364
Countryside	p.365

Barrow Hospital, Barrow Gurney	p.365
Schedule 2: Proposed Employment Sites	p.367
Weston-super-Mare	p.367
Clevedon	p.368
Nailsea	p.371
Portishead	p.373
Service Villages	p.375
Schedule 3: Safeguarded Employment Sites	p.376
Clevedon	p.376
Nailsea	p.381
Portishead	p.382
Service Villages	p.384
Schedule 4: Local Green Space	p.385
Backwell	p.385
Congresbury	p.390
Nailsea	p.391
Weston-super-Mare	p.398
Wrington	p.399
Yatton	p.400
Schedule 5: Proposed sites for Community Use	p.405
Primary School	p.408
Strategic Open Space	p.409
Sustainability Appraisal	p.415
Sustainability of Settlement Review	p.426
Other Sites Put Forward	p.433
Public Comments on Other Sites Put Forward	p.546

Section

Consultation arrangements

Name	Organisation	Comment ID	Comment Received
Hoddell Associates	Hoddell Associates	1055809//1	<p>The consultation documents fail to make clear that, at this stage of the plan-making process, comments should relate to the four tests of 'soundness' as set out in paragraph 182 of the NPPF.</p> <p>Accordingly we question whether the council has given adequate notice to potential respondents of the fact that the plan will be assessed by the Planning Inspectorate in accordance with those requirements.</p>
Naigalseye		14647553//1	<p>Consultation arrangements for the people of Nailsea were not well advertised and held in a venue which, though externally accessible, was cramped within. making it difficult to see the display boards and to move round tables and the head of the spiral staircase down to the basement floor. Those in attendance were courteous but unable to add very much detail to what was on display or to answer questions about future plans and next steps.</p>
Naigalseye		14647553//2	<p>Consultation arrangements for the people of Nailsea were not well advertised and held in a venue which, though externally accessible, was cramped within. making it difficult to see the display boards and to move round tables and the head of the spiral staircase down to the basement floor. Those in attendance were courteous but unable to add very much detail to what was on display or to answer questions about future plans and next steps. The consultation therefore did not fully meet the tests of soundness.</p>
Nailsea Action Group	Nailsea Action Group	14823809//1	<p>In terms of the tests of soundness the preparation of the plan was weak in its engagement with the community of Nailsea. The consultation was not well publicised, particularly for a consultation of this level of significance.</p> <p>We understand that North Somerset Council did advertise locally but many Nailsea residents were entirely unaware of the consultation.</p> <p>The website was not straightforward to navigate, and many people could not find where they could object to specific sites. The public consultation was disappointing as the venue was</p>

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			<p>cramped, access to the limited number of displays was poor and advice and the provision of information was courteous but could not be offered in much detail.</p> <p>This current consultation has been publicised in a similar manner and also suffers from both running at the same time as the Joint Spatial Plan and in the lead up to Christmas.</p>
Nailsea Action Group	Nailsea Action Group	14823809//13	<p>The current consultation website makes no reference to the criteria that the Planning Inspectorate will consider when reviewing the plan and public comments made. It also does not explain that the Planning Inspectorate will not see public comments from the previous consultation. Residents of North Somerset have therefore not been given sufficient information to be able to make comments about the areas that will be of interest to the Planning Inspectorate. As a result we do not consider the consultation arrangements to have given members of the public a fair opportunity to respond appropriately to the plan at this stage of the process. The consultation period should be extended, with suitable public information and notification provided.</p>
Nailsea Action Group	Nailsea Action Group	14823809//14	<p>The current consultation website makes no reference to the criteria that the Planning Inspectorate will consider when reviewing the plan and public comments made. It also does not explain that the Planning Inspectorate will not see public comments from the previous consultation. Residents of North Somerset have therefore not been given sufficient information to be able to make comments about the areas that will be of interest to the Planning Inspectorate. As a result we do not consider the consultation arrangements to have given members of the public a fair opportunity to respond appropriately to the plan at this stage of the process. The consultation period should be extended, with suitable public information and notification provided.</p>
HELLIS		14827873//1	<p>The arrangements for both the initial and current consultations for this plan did not publicise the consultations so that affected people were sufficiently informed. Many people are unaware of the plans. For a plan that proposes to add 1,000 houses to a town (Nailsea), more direct publicity should occur e.g. letters to each household.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>I would also like to raise that the consultation information on this website does not explain that the Planning Inspectorate is only concerned with certain aspects of the plan and that he/she will not see comments from the previous consultation. I do not think this is fair to affected people and I think the consultation should be extended, with proper information provided.</p>

Section

Introduction

Name	Organisation	Comment ID	Comment Received
Long Ashton Parish Council	Long Ashton Parish Council	11197185//1	Long Ashton Parish Council supports the NSC's Site Allocations Plan as currently presented.
Viv Tomkinson	Congresbury Residents Association Group	15569185//1	Para 1.4 acknowledges that the SAP is a transitory plan given that the intention is that the Joint Spatial Plan being prepared by the West of England authorities should be adopted in 2018. Content of the SAP is therefore to be reviewed through what the Council call the new Local Plan for the period 2018 - 2036. Given that this is the Council's declared position we must question the real value and merit of the SAP. Public funding being spent on production of the SAP including examination by a Planning Inspector leading to possible adoption of the SAP in June 2017 must be questionable given that the SAP will have a lifespan of 12-18 months!
North Somerset Internal Drainage Board (Simon Bunn)		16130337//1	<p>The North Somerset Levels Internal Drainage Board have made numerous consultation responses during the plan making process and although the Board does not object to any of the individual site allocations they object to the document as a whole. There are constraints imposed by the rhyne network in the Board's district that have been identified and provided as part of the local plan consultation process and we are disappointed that this information does not appear to have been taken into consideration or influenced the site allocations and associated policies.</p> <p>The issues that concern the Board are access for maintenance and the flow of water into the Board's district. Both of these issues can impact on the site capacity that is deliverable on an allocated site and are specific constraints to individual sites. The Board believes these constraints should be noted in the 'site specific details/notes' column as they will have a significant impact on the site, its layout and the deliverable housing density for the individual site allocation.</p> <p>The Board also feels that because of the complexities of flood risk, surface water drainage and access arrangements for maintenance, a Flood and Water Supplementary Planning Document for North Somerset would be a way of dealing with these issues in a proactive way that facilitates development. This</p>

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			<p>has been the approach in other areas of high flood risk and areas of significant planned growth such as Cambridgeshire, Peterborough, Ipswich and Doncaster.</p> <p>Access for maintenance</p> <p>Many of the proposed allocations in the Board's district will be reliant on the rhyne network to provide a discharge location for the surface water run-off, either directly by discharging straight into the rhyne or indirectly through a surface water sewer. These require regular maintenance to maintain their capacity and conveyance ability.</p> <p>In order to allow machinery to gain access to a watercourse to undertake maintenance, all watercourses should have a corridor of uninterrupted, undeveloped land of an appropriate width on each side of the watercourse, rhyne or ditch. The widths required will vary depending on the size or importance of the watercourse, but 9m is the preferred width for all rhyne that are maintained by the Board. The Board's bylaws formed under the Land Drainage Act 1991 will require a consent to be granted from the IDB before construction of any sort is undertaken within 9m of any watercourse. All other watercourses require 6m uninterrupted, undeveloped land both sides for access.</p> <p>New development can impinge on access, it can reduce existing access and impede the current method of undertaking the works in the most efficient and cost effective way. Material that is removed from the rhyne, such as silt and vegetation is normally placed on the bank, if there is insufficient room it will need to be removed offsite, which is significantly more expensive and less sustainable.</p> <p>This requirement for maintenance will have an impact on developable land and therefore have an impact the site capacity.</p> <p>The Board is concerned that this requirement has not been taken into consideration and the site capacity stated may not be achievable. This puts undue pressure on the Board when the actual planning application is submitted to reduce its requirements; reduced access can lead to reduced maintenance which will increase flood risk.</p> <p>Surface water run-off</p> <p>The water levels in the rhyne in the Board's district are managed through a number of control structures. This provides a</p>

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			<p>constant level of water which is kept higher in the summer for agricultural and environmental reasons and lowered in the winter for flood risk reasons. There is an added complexity of the interaction with the sea, because when the tide is high (tide locked), there is no discharge from the main arterial rhyne system, which in turn holds the water in the wider upstream catchments. This means the rhyne are therefore very sensitive to additional surface water runoff being discharged into them. In practice this will mean a greater level of flow attenuation is required in the Board's district. The need to contain longer duration events and associated volumes leads to more storage being needed and therefore a greater site area for these features. This can reduce the developable area and reduce the achievable housing density and site capacity.</p> <p>Retention time is also an issue that needs to be addressed in an application and can impact on available developable land. Because of the way that water is managed in the rhyne network, there is a mismatch between the length of time that water is retained in a surface water drainage system on a development site and the length of time that water is retained in the rhyne network due to tidal outfalls and a maintained water level. Water in the rhyne is usually retained longer than a standard designed surface water drainage system, therefore for there to be no impact on the rhyne a longer than standard retention time is required, which normally means a higher level of attenuation and larger take on developable land is required.</p> <p>The Board is concerned that the requirement for additional attenuation storage has not been taken into consideration in its district and again this puts undue pressure on the Board when the actual planning application is submitted to reduce its requirements, as above this will potentially lead to developments increasing flood risk.</p> <p>Recently the Weston Villages Strategic Flood Solution has been developed to provide flood storage compensation for some of the new major developments in the Weston area. However, a number of recent applications have been submitted that connect into the same network of rhyne and watercourses and have not been accounted for in the Weston Villages scheme. These recent applications will need a higher level of attenuation to ensure that the proposals do not worsen or compromise the rhyne system on which the major developments will rely to convey water to the remote strategic storage solutions.</p>

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Persimmon Homes Severn Valley	-	3361153//1	<p>Introduction</p> <p>We note that the Council have not required the submission comments on forms which would be the usual process for responding to a publication draft plan so we have included the information normally required in response to each of the comments set out below.</p> <p>Plan-making Progress</p> <p>Whilst the Core Strategy overall housing number is now fixed, the Inspector's Final Report on the consequential changes to the other remitted policies has recently been released. The Inspector's conclusions are that more flexibility is needed in the wording of the settlement policies and he has proposed modifications which have yet to be adopted. However, it is important that the Site Allocations Plan Policies properly reflects the need for flexibility established by the soon to be adopted wording of the Core Strategy Policies.</p> <p>We consider the Council should review the Site Allocation Plan Policies to assess whether this plan contains sufficient flexibility and if necessary the Council should advertise any necessary modifications to the plan for consultation, prior to the submission of the plan for examination. This would then avoid any potential soundness issues at the examination itself.</p>
Banwell Parish Council	Banwell Parish Council	3984769//1	<p>Banwell Parish Council support the site allocations plan but to ask North Somerset to be mindful of the impact of traffic particularly in any future development.</p>
Highways Agency (S Walsh)		8141345//11	<p>There is no new transport evidence base presented in (or accompanying) the Plan, and therefore only general comments have been able to be provided at this time. It is our understanding that the only evidence available is that provided in support of the Core Strategy and that no further assessment has been carried out to determine the site specific impacts and potential mitigation measures which may be required to support the allocations in this Plan, or to demonstrate that such measures are viable, can be funded and ultimately delivered. This is particularly pertinent given that the overall housing provision has increased by approximately 7000 dwellings from that proposed initially in the Core Strategy and upon which the existing evidence was based. Consequently, where existing evidence is present, it may be</p>

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			necessary to reaffirm that the measures proposed in the Core Strategy remain appropriate and will be capable of supporting this increased level of growth.

Section

Policy context

Name	Organisation	Comment ID	Comment Received
Wrington Parish Council	Wrington Parish Council	1019201//1	We note and support the statements under Policy Context, in particular the key objectives listed under para 2.8. We are pleased to see the clear commitment to protecting the Green Belt and valued countryside, and to preserving the character of the existing settlements, strategic gaps and green spaces. Also the commitment to sustainable development in line with the principles set out in the NPPF
Environment Agency	Environment Agency	1020673//1	<p>Climate change and/or sea level rise should be considered when designing all new developments. Sites in fluvial Flood Zone 3 should be avoided. If approved sequentially they need to provide volume for volume flood plain compensation in areas of Flood Zone 1 or Flood Zone 2 with connectivity to Flood Zone 3.</p> <p>Exception Tests will need to be passed for all sites in Flood Zones 2 and 3. To pass this test it must be demonstrated that the developments will be safe over their lifetime. Site specific Flood Risk Assessment's required for all sites in Flood Zone 3 and will need to assess flood risk from all sources including FD2320 assessment of risk and hazard in tidal Flood Zones.</p> <p>We would prefer to see sequential approach to developments with less vulnerable uses such as retail and community facilities on ground floors. Floor levels on the ground floors should be set a minimum of 300mm above existing ground levels.</p> <p>North Somerset Council emergency planners need to agree access and egress and flood evacuation plans. As a minimum applicants must sign up to flood warning, evacuation plan and flood resilience construction methods e.g. raised plug points.</p> <p>The North Somerset Council Flood Risk and Drainage Team should be consulted with regard to surface water drainage for the sites. (Lead Local Flood Authority). There must be no interruption to the surface water drainage system of the surrounding land as a result of the operations on the site. Provisions must be made to ensure that all existing drainage systems continue to operate effectively and that riparian owners upstream and downstream of the site are not adversely affected.</p>

Name	Organisation	Comment ID	Comment Recieved
Environment Agency	Environment Agency	1020673//7	<p data-bbox="707 331 914 365">BIODIVERSITY</p> <p data-bbox="707 405 1455 678">Opportunities for biodiversity enhancement should be sought wherever possible and seek to link up and create strategic green corridors throughout the site allocation plan area. Reference should be made to the South West Nature Maps to maximize protection and creation of strategically linked valuable wildlife sites and to avoid blocking or segmenting green corridors. Dark river corridors should be maintained to benefit wildlife where possible.</p> <p data-bbox="707 719 1455 813">Provision for existing and new outdoor water based recreation such as fishing and canoeing should be considered within suitable water side developments.</p> <p data-bbox="707 853 1455 1093">Provision for green and blue infrastructure should be incorporated wherever possible. Development areas and transport links have the potential to impact on river corridors, especially where they cross the rivers. We would want to seek opportunities at these locations for mammal passes to benefit otters and other species, fish passage and riverine improvements.</p> <p data-bbox="707 1133 1455 1193">Existing hedgerows to be retained and enriched with native tree and shrub species.</p>
Naigalseye		14647553//3	<p data-bbox="707 1283 1455 1417">The plan appears to contravene many of the aspirations of the National Planning Policy Framework with regard to developments in Nailsea and therefore not consistent with the test of soundness in several respects.</p> <p data-bbox="707 1458 1455 1630">The NPPF guidance leads planners to prioritise sustainability, to seek brownfield sites over greenfield, to have due regard to the social, environmental and ecological impacts of housing developments, to look for housing that is employment led preferably locally, and to conserve the countryside.</p> <p data-bbox="707 1671 1455 1977">Notwithstanding the limitations on the possible development areas in and around Nailsea imposed by the existence of the green belt, the site allocation plan identifies areas which are green field, are part of the ancient mediaeval landscape of Somerset, and are outwith the long established and natural town boundary which was set to protect the town from further development after its massive expansion in the 1960s. Moreover, owing to the fact the current and new employment opportunities in the town are, by admission, limited, the</p>

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			<p>housing cannot be said to be locally employment led unless Bristol is counted as a local source. There are no convincing or properly funded plans for the improvement of the narrow roads and lanes on to which the sites will disgorge its traffic, which will overload the elderly road infrastructure. As matters stand, therefore, the test of soundness for sustainability and other aspects of positive preparedness, is not adequately met.</p> <p>Many of the descriptors used in the sites allocation plan that are applied to sites that are not suitable for development are not applied to Nailsea when they easily could be. North Somerset policy makers decree that Nailsea 'must take its "fair share" of the need to build more homes'. The need to build the prescribed number of houses on greenfield land in Nailsea is not proved by evidence. The allocation to Nailsea does not seem to take fully into account the matters raised in the paragraphs above. Nailsea could equally well be considered as a town when further development is unsuitable as a town unsuited to accommodate it especially without improvements in infrastructure for roads, access, parking and other commercial and social amenities.</p>
Nailsea Action Group	Nailsea Action Group	14823809//2	<p><u>Policy Context</u></p> <p>NPPF paragraph 183 requires local plans to be justified (the most appropriate compared to reasonable alternatives, based on proportionate evidence) and effective (deliverable over plan period). However, the Sites and Policies Plan does not appear to be justified or effective for the sites to the west of Nailsea due to the following:</p> <ul style="list-style-type: none"> • Alternative sites not selected are mainly in locations further or as far from amenities compared to the West of Engine Lane site. They are therefore not reasonable alternatives. • When determining the sites to include in the plan, the landscape character assessment does not appear to have been considered (see comments for under evidence section base), which is an omission of appropriate evidence. Therefore, the plan is not based on complete evidence and so is not fully justified. • The plan assesses the sustainability of proposed sites, but does not apply the criteria appropriately or consistently. The plan is therefore not based on

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			<p>proportionate evidence for the West of Engine Lane site. See the attached document in the review of sustainability section for details.</p> <ul style="list-style-type: none"> The plan does not meet the requirement of NPPF paragraph 157 to plan for infrastructure (see Plan making and infrastructure below) so cannot be considered deliverable or effective. Also, lack of consideration of infrastructure requirements means that proportionate evidence is lacking and so the plan is not justified. <p><u>Sustainability</u></p> <p>National policy requires plans to deliver sustainable development. However, the sustainability assessment for Nailsea is not robust. It is not based on the criteria set out in the sustainability scoping assessment and it does not apply the criteria consistently. For more details see the sustainability appraisal section. Therefore, the plan does not meet the NPPF requirements in respect of sustainable development.</p> <p><u>Plan making and infrastructure</u></p> <p>At the first consultation, objections were raised about the lack of suitable road infrastructure to support the proposed sites in Nailsea, particularly the west of Nailsea. The response to these comments was that road infrastructure requirements would be considered at the planning application stage. However, NPPF paragraph 157 requires a plan to "plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework". Associated Planning Practice Guidance (Local Plans section 018) states that "The Local Plan should make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development". Therefore the lack of planning for infrastructure provision is a contravention of the NPPF and associated Planning Practice Guidance.</p> <p>See also comments on evidence base.</p> <p><u>Local policy</u></p> <p>The Core Strategy CS5 requires planning to pay close regard to the landscape characters in North Somerset (which include the Nailsea Farmed Coal Measures) and "protect, enhance and respect the landscape". However, the plan does not demonstrate</p>

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			<p>consideration of this requirement. See comments for the West of Engine Lane site in respect of landscape impact.</p>
Viv Tomkinson	Congresbury Residents Association Group	15569185//2	<p>Para 2.7 states that the Planning Inspector appointed to examine the remitted policies of the Core Strategy is expected to issue his report in November 2016 leading to adoption by NSC in December 2016. We would question whether consultation on the SAP in advance of the publication of the outcome of the examination of the remitted Core Strategy policies was a prudent decision by NSC. How is NSC going to address any implications for the SAP arising from the Inspector's findings.</p> <p>Para 2.7 of the SAP states that it is anticipated that the Core Strategy will be adopted in December 2016 and 'At that point North Somerset will have re-established a fully adopted Core Strategy which will provide a clear planning context for the preparation of the Site Allocations Plan and the assessment of development proposals'.</p> <p>BUT this consultation process demonstrates that the SAP has already been prepared. It seems to us that NSC lacks a coherent strategy for iterative and interactive development and adoption of the principle components of the Core Strategy. This can only weaken the value of the SAP as a planning document to inform the assessment of development proposals.</p>
Persimmon Homes Severn Valley	-	3361153//2	<p>The National Policy Context set out in section 2 is very selective and misleading and does not reflect National Housing Policy. The Council's response to a similar comment at the consultation draft stage was that '<i>there is no need to repeat in detail the requirements of the NPPF.</i>' This rather misses the point which is that paragraph 2.3 does contain a summary of parts of the NPPF but in the context of the Site Allocations Plan misses critical parts of the guidance</p> <p>In respect of the second bullet point on page 8, the NPPF requires Local Authorities '<i>to boost significantly the supply of housing, not merely 'increase the supply of housing'</i>' (NPPF paragraph 47). Then, the golden thread running through both plan-making and decision-taking, the presumption in favour of sustainable development, is completely ignored. The failure to embrace these two core principles of the NPPF have undoubtedly contributed to the Council's difficulties in</p>

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			<p>achieving a fully adopted Core Strategy with an up-to-date housing policy.</p> <p>The National Planning Policy Guidance (NPPG) emphasises that <i>‘Local Plans should be based upon and reflect the presumption in favour of sustainable development’</i>, and that <i>‘this should be done by identifying and providing for objectively assessed needs and by indicating how the presumption will be applied locally.’</i> Therefore it is one of the purposes of the Site Allocations Plan to meet the needs set out in the OAN for both housing and employment and it is important to recognise this in the policy context to set out an appropriate test for whether or not the plan itself is sound.</p> <p>Further guidance is set out in the Planning Advisory Service Good Plan-Making Guide. It says <i>‘a successful plan will make clear what development is going to be delivered and when, where and how,’</i> and that <i>‘many soundness problems arise from a failure to properly answer the critical questions of when, where and how development will be delivered.’</i> Paragraph 2.5 of the guide encourages a single plan approach and that <i>‘delaying addressing critical issues by the promise of preparation of later development plan documents without proper justification is a dangerous approach.’</i> This is an important consideration here, where the Site Allocations Plan is itself the last document which will comprise the North Somerset Local Plan and so is the last chance to demonstrate that needs will be met and the whole Local Plan is sound.</p> <p>We note that paragraph 3.10 says ‘A Habitats Regulations Assessment will be submitted at the Publication Plan stage.’ This is the publication plan and there does not appear to be a HRA as part of the Evidence Base, which would mean the plan is not legally compliant</p>
Barrow Gurney Parish Council	Barrow Gurney Parish Council	4618561//1	Barrow Gurney Parish Council wishes to express support for the Site Allocations Plan 2006 - 2026.
Butcombe		9242497//1	<p>The Butcombe / Redhill Group on Airport Parking - Response to the Site Allocations Plan Consultation</p> <p>We are a recently formed community action group, currently consisting of some 20 members from Butcombe and neighbouring villages, concerned with issues around airport</p>

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			<p>parking. We aim to voice these concerns on behalf of vulnerable individuals, particularly about the impact of unauthorised parking on the locality, and to encourage North Somerset Council to adopt an integrated solution to the numerous parking challenges created by the Airport expansion plans.</p> <p>There appears to be no strategic approach to parking challenges created by Bristol Airport's current requirements and expansion plans and we believe that two related problems need to be addressed by the Sites Allocation Plan.</p> <p>1. The long-standing widespread practice of fly parking. Recent use of Article 4 regarding temporary change of use may assist enforcement but is unlikely to deter operators of illegal fly parking, who will continue to play the appeals system.</p> <p>2. Parking at Bristol Airport. At present the Green Belt is to be breached in swathes to provide vast new and contentious parking facilities at Bristol Airport. In addition, this proposal increases pressure on the core and access roads and discourages the use of public transport.</p> <p><i>We would urge the Council to adopt a strategic approach to airport car parking based on the identification of park and ride sites that do not breach the Green Belt and, following consultations, put these out for tender.</i></p>
North Somerset District Committee of CPRE	CPRE	931233//1	<p>We are pleased to note there is continued support for North Somerset's existing Green Belt. It prevents the sprawl of Bristol and its encroachment into valued countryside and to preserve the character of existing settlements, valued strategic gaps between settlements and characteristic green spaces. We also note and support the reference to physical and social infrastructure which is to be improved in tandem with development</p>
R Burrows	-	939361//1	<p>There is nothing about self-build, the allocation of self-build sites nor the duty to record those interested in self-build in order to assess demand for self-build. NSCs website points to the national register, yet the national register informs us that NSC are not participating.</p>

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Edwards		998977//1	Support retention of green belt around Bristol

Section

Evidence base

Name	Organisation	Comment ID	Comment Received
Wrington Parish Council	Wrington Parish Council	1019201//2	<p>We note the reference to the evidence base and key documents. In the previous consultation we commented that we were disappointed that the Habitat Regulations Assessment (HRA) hadn't been made available. We note the statement under para 3.10 that the HRA 'will be submitted at the Publication Plan stage', which might be expected to be now, or at least it should be if it's to be made available for comment. It seems that the wording here has been carried over, with no explanation provided as to why the HRA hasn't already been completed</p>
N Cooper	Claverham Future	14206753//1	<p>Inaccuracy in assessment of residential sites in Claverham. IT IS AGREED THAT BOTH SHOULD BE REJECTED AS UNSUSTAINABLE AND UNSUITABLE BUT ON SITE VERIFIABLE DATA MUST BE CORRECTED:</p> <p>For Both Land off High Street AND North of Chestnut Drive</p> <p>Claverham is, in part, connected to Yatton but the majority of factors should be specific to Claverham and its centre of population which is distant from matters in Yatton. Accordingly:</p> <p>1.1 there is undersupply of public open space and this should be RED</p> <p>1.2 there is no playing pitch in Claverham so should be RED</p> <p>2.4 there is no reasonable access to employment in Claverham (UTC is known to be closing) so should be RED</p> <p>4.2 there is known SAC bat activity in the village and these sites are foraging areas so must be at least AMBER</p> <p>5.1 Bus Transport is once per hour and useless for most commuting so AMBER</p> <p>5.3 Neither site has safe access to anything other than immediate housing so both should be RED</p>

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			<p>Land North of Chestnut Drive</p> <p>4.1 Is immediately adjacent to and within the setting of Claverham House, the council planning dept. has received learned reports on this and such an oversight is very wrong this category MUST BE RED.</p>
Nailsea Action Group	Nailsea Action Group	14823809//3	<p><u>Evidence Base</u></p> <p>The evidence base used for the plan and conclusions drawn have not been adequate to meet the requirement for the plan to be justified by being based on proportionate evidence.</p> <p><u>Landscape character assessments</u></p> <p>Paragraph 170 of the NPPF states “Where appropriate, landscape character assessments should also be prepared, integrated with assessment of historic landscape character, and for areas where there are major expansion options assessments of landscape sensitivity.” No landscape character assessment was prepared for the Site Allocation Plan, despite many sites being greenfield. In light of NPPF paragraph 167 explaining that should not repeat policy assessment that has already been undertaken, we assume that this is because North Somerset still consider the 2005 Landscape Character Assessment to be valid. However, there is no reference to this assessment in the plan, despite the Core Strategy requiring close regard to be paid to the landscapes identified for North Somerset (in the context of protecting and enhancing the landscape) and paragraph 170 of the NPPF requiring the landscape character assessment to be integrated with assessment of historic landscape character. See comments on the West of Engine Lane site for reference to the impact of this breach of guidance. Test of soundness no. 1 is therefore not adequately met in this instance.</p> <p><u>Infrastructure requirements</u></p> <p>The evidence base documents do not include an assessment of the traffic impacts of the new sites. However, a recent planning application in Nailsea (Youngwood Lane, 16/P/1677/OT2) included a traffic assessment of the impact of sites in the Sites and Policies Plan in 2021. The assessment method was approved by North Somerset Highways. Considering this type</p>

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			<p>of evidence would have revealed that the sites in Nailsea contribute towards a severe impact on road and junction capacity in the context of NPPF paragraph 32. Several road and junctions in the west of Nailsea would be severely affected, which is reflective of the unsustainable locations of the sites that are far from amenities (e.g. West of Engine Lane). However, this is not reflected in the plan, and therefore again does not meet the first test of soundness.</p> <p>Sustainability assessment</p> <p>The residential site assessment assesses the sites considered in respect of sustainability criteria. However, following issues/ inconsistencies lead to the assessment not being reasonable (more detail on each point is given in the attachment 'SAP2 sustainability main assessment West of Engine Lane' attached in our response to the sustainability appraisal section):</p> <ul style="list-style-type: none"> • the criteria assessment and conclusions drawn are inconsistent for sites in Nailsea. This has resulted in the West of Engine Lane site being included for development despite being just as unsustainable as adjacent sites, which although no further from amenities were not included on the basis of distance. • the assessment uses criteria set out in the first sheet of the spreadsheet, but this criteria is not consistent with the criteria shown in the sustainability scoping report or generally accepted distance criteria (which are consistent with the scoping report). • some of the evidence used is not based on reasonable measures. For example, landscape impact is based on 'general views from public vantage points'. However, the photos shown in the attachment in our response to the sustainability appraisal section, demonstrate that the assessment given is not reasonable, because there would be significant landscape impact from public vantage points. <p>Therefore, the evidence base for the sustainability assessment is not proportionate and the plan to include the West of Engine Lane site is not justified.</p> <p>Capacity of town centre - Nailsea</p> <p>The plan assumes that Nailsea is an appropriate place for development because the town centre has a range of facilities. However, no assessment of the facilities or scope for</p>

Name	Organisation	Comment ID	Comment Received
			expansion has been undertaken. This breaches NPPF paragraph 161, which states that plans should use their evidence base to assess “the capacity of existing centres to accommodate new town centre development.”the capacity of existing centres to accommodate new town centre development“.
HELLIS		14827873//5	<ul style="list-style-type: none"> · Sites were selected without having assessed infrastructure, traffic and environmental impacts (potentially resulting in refusal of planning permission at the individual application stage). · There are contradictions between evidence used for the Site Allocations Plan and the West of England Joint Spatial Plan: Towards the Emerging Spatial Strategy suggest that the evidence used was not robust. · There are many contradictions within the plan in respect of evidence used e.g. the sustainability criteria in the methodology paper is not the same as that used in the residential sites assessment, and the criteria has not been applied consistently e.g. the West of Engine Lane site has been included, whereas other sites the same distance from facilities were rejected.
Tim Hawes		15955489//1	<p>Inaccuracies in Assessment Criteria for 3.2 hectare area of land north of Lyefield Road</p> <p><u>Sub objective 1.3 Proximity to public leisure centre</u></p> <p>The site is between 2 and 5km from a public leisure centre so this should be graded as amber and not green</p> <p><u>Sub objective 1.4 Achieve reasonable access to healthcare facilities</u></p> <p>Unless there are plans to build a new doctors surgery on the land then this should be graded as amber not green – limited healthcare provision provided within 5km of settlement</p> <p><u>Sub objective 2.1 Achieve reasonable access to a full range of community facilities</u></p> <p>Inadequate road access means that there would only be “fair access” not “good access” so grading should be amber and not green.</p>

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			<p><u>Sub objective 2.2 Achieve reasonable access to primary education</u></p> <p>Unless there are plans to build a primary school on the land then this should be graded as red and not amber – ie no primary schools within settlement</p> <p><u>Sub objective 4.1 Minimise impact on and where appropriate enhance the historic environment, heritage assets and their settings</u></p> <p>Woodspring Priory is located on Collum Lane. I'm not sure how a large housing estate would enhance it's setting? This should be graded as amber and not green as the site is close to a heritage asset</p> <p><u>Sub objective 4.8 Minimise impacts on air quality through locating development in locations least likely to contribute to traffic congestion</u></p> <p>Development on this site will cause significant traffic congestion as the roads are completely inadequate to deal with extra traffic. This should be graded as red and not amber as there are existing highway capacity issues.</p> <p><u>Sub objective 5.2 proximity to bus stops</u></p> <p>The nearest bus stop from the site is between 400 and 600m. This should be graded as amber and not green</p> <p><u>Sub objective 5.3 Pedestrian and cycleway links</u></p> <p>This should be graded as red and not amber as there is no pavement or cycleway on Lyefield Road or Collum Lane</p>
J.Ashley		16032769//1	<p>In the Residential Site Assessment section 'Assessment criteria for sites put forward for residential development' it is stated 'Impact on bats and their habitat can usually be overcome by mitigation and this is reflected in an amber rating'.</p> <p>I would like to comment on this statement. The larger bats only forage successfully in areas where there is near complete darkness. For instance the Horseshoe bats. This means there needs to be very little light on their foraging/commuting routes</p>

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			<p>in order for the bats to thrive. Any residential development close to the foraging/commuting routes could potentially result in light pollution. Even if a construction company implements mitigation, by installing dim street lighting near the bat's foraging and commuting routes. Residents could install a security light which may be triggered by movement or place ornamental lights in the garden and disrupt the bats flight corridors. Housing developments close to bat foraging routes should not be permitted.</p>
No Moor Development (Yatton)	No Moor Development	16100417//2	<p>Hierarchy and cumulative impact</p> <p>In February 2016 NSC undertook an assessment to provide an indicative 'hierarchy' of the relative 'sustainability' of settlements in North Somerset. NSC admitted that <i>"this is not a precise art and... a matter of judgement."</i></p> <p>The sustainability appraisal for Yatton (Feb 2016) accepted that <i>"there is a major recognised issue with traffic congestion through the village"</i> - although this merited only a cursory mention. This constraint is now recognised in the emerging Joint Spatial Plan.</p> <p>Comparing data derived from the 2011 census with the Site Allocation proposals, the 696 planned and approved new dwellings in Yatton - a 'Service Village' - amounts to an increase of 22% on the 3,116 existing dwellings.</p> <p>We welcome the modification to the Core Strategy which states that "the cumulative impact of development will be a significant consideration and a succession of piecemeal developments which individually or taken together have an adverse effect on any individual village are unlikely to be supported." We believe this is particularly relevant to the Moor Road allocated site in Yatton, given the significant other permissions in the immediate vicinity.</p> <p>Yatton only accounts for 4% of the total population of North Somerset, yet house-builders are saturating the housing market in one location and building the homes that will make them the most profit (on green fields).</p>
Persimmon Homes Severn Valley	-	3361153//3	<p>Housing Context</p> <p><u>Full Objectively Assessed Nee</u></p>

Name	Organisation	Comment ID	Comment Received
			<p>As acknowledged in the Inspector's Report in to the examination of Policy CS13, the policy does not comply with National Guidance, in that it is not based on a full objective assessment of housing need of the whole HMA. This has been accepted by other Inspector's in subsequent Section 78 Appeals (latterly south of Knightcott Road, Banwell APP/D0121/W/15/3138816, paragraph 20 and north of the A368, Sandford APP/D0121/W/15/3139633, paragraph 12).</p> <p>Equally the emerging West of England Joint Spatial Plan Consultation Draft, whilst it is supported by a new SHMA, derives a full West of England housing figure which it does not disaggregate to each Local Authority and in addition there are substantial objections to this figure which remains untested at examination.</p> <p>Whilst this is particularly of great significance in determining Section 78 Appeals and whether paragraphs 14, 47 and 49 of the NPPF are engaged, it cannot be ignored in relation to the preparation of the Site Allocations Plan.</p> <p>The Banwell Inspector agreed that there is an argument to accept that the development plan housing requirement in Policy CS13 is appropriate for measuring housing supply in North Somerset (paragraph 25 of the Inspector's Report) in spite of the above. That is clearly a pragmatic approach which continues the direction of travel begun by the Policy CS13 Inspector of trying to find a way forward in North Somerset. However, that does not mean, at this final stage in the long drawn out preparation of the North Somerset Local Plan, that it is appropriate to cut corners and not take all reasonable steps to demonstrate despite the non policy compliant housing figure is delivered in accordance with the additional requirement to boost the supply of housing in NPPF 47.</p> <p>On the basis of a housing figure of 20,985 which will not meet the full objectively assessed need, we therefore consider that a total allocation of 21,051 will not significantly boost housing supply. As a compromise has already been made in establishing the housing need in North Somerset, as set out above, we consider this further compromise is unacceptable. We know from numerous appeal decisions that even where the housing requirement has been properly derived through a FOAN, the resulting housing figure should not be considered as a maximum. To avoid the continuing process of planning by appeal and planning application in North Somerset, the Site Allocations Plan should identify sufficient sites for a delivery</p>

Name	Organisation	Comment ID	Comment Received
			<p>figure in excess of the CS13 figure. The figure should be planned for rather than met through unplanned applications.</p> <p>Persimmon Homes Severn Valley consider the plan fails to allocate sufficient sites to deliver the Core Strategy housing requirement of 20,985. Factors that need to be taken into consideration are set out below.</p> <p>The overall position is that total commitments are identified as 21,114, only 129 above the Core Strategy Policy CS13 requirement, which establishes a flexibility allowance of only 0.3%. Therefore in order to deliver the Core Strategy requirement this assumes that virtually all the potential capacity set out as <u>commitments</u> in Table 1 has to be delivered. These commitments include all the proposed allocations and 2 different unexplained categories of large sites with consent, small sites with consent and a windfall allowance based on past rates.</p> <p>General practice is to build some flexibility into the housing figures in order to meet National Policy requirements but in North Somerset we consider this is an absolute necessity for a number of reasons:</p> <p>(i.) The overall policy approach to housing in the NPPF is <i>'to boost significantly the supply of housing'</i> but this is not just a theoretical exercise to identify a supply as it appears in section 6 of the framework under the heading <i>'Delivering a wide choice of high quality houses'</i>, which demonstrates the need to deliver the housing not just to identify a supply. This is emphasised by the requirement in the second bullet point of NPPF 47, to <i>'identify and update annually a supply of specific deliverable sites'</i>.</p> <p>Paragraph 50 of the framework identifies the <i>'need to deliver a wide choice of high quality houses'</i> and <i>'widen opportunities for homeownership.'</i></p> <p>NPPF 159 says Local Planning Authorities should identify a scale and mix of housing which, <i>'caters for housing demand and the scale of housing supply necessary to meet the demand'</i>.</p> <p>Therefore there can be no doubt that the emphasis in Government Policy is on ensuring that housing numbers which are identified are actually deliverable and are delivered.</p>

Name	Organisation	Comment ID	Comment Received								
			<p>(ii.) NPPF 159 also requires Local Authorities to prepare a SHMA and continuing the emphasis on delivery, ‘to establish realistic assumptions about the availability, suitability and likely economic viability of the land to meet the identified need for housing over the plan period.’ In addition the Good Plan-Making Guide further advises that ‘the SHLAA should be prepared in consultation with the development industry and key stake holders and should identify as many potential housing sites in the area as possible.’ We consider that North Somerset HELA fails to meet this guidance. Whilst the Council invites Developers and landowners to submit sites for inclusion in the HELA there is no industry involvement in the assessment of the sites identified or whether they represent all potential development opportunities.</p> <p>(iii.) To provide evidence that the plan does boost housing supply, NPPF 47 also requires Local Planning Authorities to illustrate the <u>expected rate of delivery</u> through a housing trajectory for the plan period <u>and</u> set out a housing implementation strategy. Again the emphasis is on delivery, but the Site Allocations Plan does not include either a trajectory or a delivery programme.</p> <p>(iv.) Under-delivery – in commenting on the consultation draft we made the following comments on under-delivery of housing in North Somerset: The Council’s persistent under-delivery in the past, on its own requires a transparent approach to how sufficient housing numbers will be delivered in the future. Whilst the Council might argue there was only minimal (and therefore not persistent) under-delivery against the pre-challenge Core Strategy housing requirement of 14,000 dwellings, this was found to be unsound and so seriously underestimated the housing requirement that itself amounts to an act of under-delivery. Whilst actual delivery is then assessed against the increased requirement of 20,985, it is clear that there has been persistent under-delivery and that the housing requirement has not been met in any year for the past 6 years this is illustrated in the following table.</p> <p>Housing Delivery Since 2006 in Comparison to Various Annual Targets (Delivery figures taken from the Council’s Annual Monitoring Reports)</p> <table border="1" data-bbox="710 1832 1455 2020"> <thead> <tr> <th data-bbox="710 1832 858 2020">Year</th> <th data-bbox="858 1832 1023 2020">Completion</th> <th data-bbox="1023 1832 1206 2020">Adopted CS (2012) – 14,000 units</th> <th data-bbox="1206 1832 1455 2020">Adopted modified requirement (July</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Year	Completion	Adopted CS (2012) – 14,000 units	Adopted modified requirement (July				
Year	Completion	Adopted CS (2012) – 14,000 units	Adopted modified requirement (July								

Name	Organisation	Comment ID	Comment Recieved			
					(2006 to 2026)	2014) – 20,985 (2006 to 2026)
			Annual Req		700	1,049
			2006-2007	1,132	432	83
			2007-2008	1,474	774	425
			2008-2009	935	235	-114
			2009-2010	772	72	-277
			2010-2011	637	-63	-412
			2011-2012	515	-185	-534
			2012-2013	527	-173	-522
			2013-2014	760	60	-289
			2014-2015	674	-26	-375
			2015-2016	569	-131	-480
			TOTAL	7,995	995	-2495

Name	Organisation	Comment ID	Comment Received
			<ul style="list-style-type: none"> • In terms of the various elements that make up Table 1 of the Site Allocations Plan, there is no assessment of constraints or risks to delivery of the numbers generally or of specific sites. Comments on this are included in respect of Schedule 1 of the document. • The unreliability of the Council’s figures and their assumptions have contributed to a persistent inability to demonstrate a 5 year housing land supply as demonstrated by a number of recent appeal decisions. This unreliability is demonstrated again by the change in the windfall figures from those in the consultation draft of March 2016 to those in the publication version in October 2016. In just over 6 months a windfall allowance <u>based on past rates</u> has gone down from 1,200 to 897, including a reduction of almost 200 in Weston-super-Mare. It is inconceivable that past rates will have changed so dramatically in that time and the only assumption can be that the first figure was vastly inflated and plainly wrong. • In response to similar comments at the consultation draft stage the Council said <i>‘the Core Strategy Inspector for the remitted policies examination was clear that there has not been persistent under-delivery within North Somerset. The SAP identifies sufficient sites to deliver the Core Strategy housing requirement over the plan period and the Council’s 5 year land supply work considers the deliverability of each individual site and is published separately.’</i> <p>However, in the last two housing appeals heard in North Somerset both Inspector’s found evidence of persistent under delivery and applied a 20% buffer. Both Inspector’s also took into account changing economic conditions. At land to the north of the A368, Sandford (APP/D0121/W/15/3139633) the Inspector found <i>‘there has been a consistent record of under delivery totalling 2,201 dwellings in the 5 year period to 2016’</i> (IR26) and <i>‘it is difficult to avoid the conclusion that this represents persistent under delivery.’</i> (IR27).</p> <p>At land south of Knightcott Road, Banwell (APP/D0121/W/15/3138816) it is clear that the Council itself also accepted it was under delivering – <i>‘during cross-examination the LPA’s relevant witness accepted that in 10 years there had been PUD against the adopted CS housing requirement.’</i> (IR30)</p>

Name	Organisation	Comment ID	Comment Received
			<p>The difference in the conclusions of the Core Strategy Inspector's and the Section 78 Inspectors is due to the different level of interrogation undertaken, as recognised by the Sandford Inspector in paragraphs 24 to 25 of his Report. What is clear is that when housing delivery in North Somerset is properly examined under cross-examination, even the Council themselves recognise there has been persistent under delivery</p>
Highways Agency (S Walsh)		8141345//1	<p>It is noted that none of the evidence base documents referred to in Section 3 of the Plan relate to highways or transport infrastructure and no further evidence base documents have been published to support this consultation.</p> <p>Due to this we have only been able to provide general comments on the policies and sites in the Plan and our comments below are provided on the understanding that the only currently available evidence in relation to transport infrastructure is that submitted in support of the Core Strategy.</p> <p>We understand that there is little to no strategic transport evidence underpinning the site allocations and that sites coming forward for development are assessed on the basis of the transport evidence accompanying any application.</p>
Fisher German		9086945//1	<p>Thank you for your enquiry dated 7 November 2016. We can confirm that our client's apparatus, the CLH Pipeline System – Energy Act 2013 (CLH PS), may be affected by your proposals as indicated on the attached plan(s). The plan(s) supplied are intended for general guidance only and should not be relied upon for excavation or construction purposes. No guarantee is given regarding the accuracy of the information provided and in order to verify the accurate location of the pipeline in conjunction with your proposals you should contact, to arrange a site visit.</p>
Coal Authority	The Coal Authority	928833//1	<p>Support – The Coal Authority is pleased to see that those employment and residential allocations were development</p>

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			<p>proposals will need to be supported by a Coal Mining Risk Assessment have been identified in the schedule of sites.</p> <p>Further details in attached letter</p>
North Somerset District Committee of CPRE	CPRE	931233//2	<p>It is acknowledged in the document that a Habitat Regulations Assessment (HRA) is required and that potentially there may be some issues with certain sites. The publication states that a Habitat Regulations Assessment will not be made available until the publications stage. Given the indication that an HRA would be required for the Sites Allocation Plan it would be expected with that Plan. We have concern that it is currently not available for comment</p>
R Burrows	-	939361//4	<p>As Bleadon has several approved applications that will change the sustainability of Bleadon and given that it is already in closer proximity to Weston than some of the outer lying expansion developments we feel that it should be looked at again.</p>

Section

Policy SA1: Housing Allocations

Name	Organisation	Comment ID	Comment Received
Wrington Parish Council	Wrington Parish Council	1019201//8	<p>Proposed large sites for residential development (over 10 dwellings)</p> <p>As referred to above under Policy SA3, it would be better if the mixed use sites are listed separately as these are covered by this specific policy, and not under Policy SA1. Unless clearly separated there is the potential for confusion. Otherwise we have no comment to offer.</p>
Wessex Water	Wessex Water	1089633//1	<p>Our principal concern relates to network capacity where multiple sites are brought forward around settlements requiring significant improvements to the downstream network to avoid sewer flooding. The points of discharge for surface water can become critical. Wessex Water will engage with planners and developers at the earliest opportunity to agree a foul and surface water drainage strategy for the new allocations identified. We would welcome any opportunities to be involved in masterplanning, pre-application discussions and partnership working with the Lead Local Flood Authority. Regulatory funding requirements for the period 2015 – 2020 are already in place with a supporting capital programme. We will be preparing a further review of development across the region to support capacity requirements for a 5 year period beyond 2020.</p> <p>Please note that Bristol Water is responsible for water supply in North Somerset. Please refer to Bristol Water for any comments on water resources.</p>
Gladman Developments Ltd	Gladman Developments	11199745//2	<p>Gladman are concerned with the piecemeal approach that North Somerset is taking with the preparation of the Local Plan. The remitted policies of the Core Strategy are being progressed separately from the adopted Sites and Policies Plan Part 1: Development Management Policies and separately from the emerging Sites and Policies Part 2: Site Allocations Plan. This approach seems confusing, disjointed and has the potential to alienate people and dissuade them from becoming involved in the process. The whole of the</p>

Name	Organisation	Comment ID	Comment Received
			<p>Sites and Policies Plan should have been progressed as one comprehensive document including Development Management Policies and Site Allocations.</p> <p>The Council is now in receipt of the Inspector's Report into the soundness of the remitted policies (November 2016) which has clarified some matters; however, recent appeal decisions have raised issues which will have a bearing on the consideration of the Site Allocations Plan.</p> <p>Gladman are still concerned that upon adoption of the Site Allocations Plan, North Somerset Council will not be able to demonstrate a 5-year supply of housing land which would render the Plan 'unsound'.</p> <p>The position at present (December 2016) is that the Council cannot demonstrate a 5 year supply of housing land and this is accepted by the Council. A failure to demonstrate a supply was found to be the case in a number of recent appeal decisions, most notably Land North of A368, Sandford (APP/D0121/W/15/3139633). Indeed, it was accepted as common ground by the Council for the Land off Wentwood Drive, Weston-super-Mare appeal (APP/D0121/W/16/3151660) and also acknowledged by Inspector Boniface in his decision letter (paras 6 + 47), issued on 2nd December 2016.</p> <p>The Inspector at the Sandford appeal (APP/D0121/W/15/3139633) quite rightly acknowledged that the task facing the Council and the development industry of delivering sufficient housing was formidable (para 33). Therefore, the Council should be making every effort possible to ensure that the Site Allocations Plan identifies sufficient sites, with a suitable degree of flexibility to guarantee that the housing requirement is met or exceeded. Gladman do not believe that the current iteration of the Site Allocations Plan achieves this.</p> <p>Although Inspector Bore, in his report on the Remitted Policies, suggested that North Somerset should apply the Sedgefield approach and a buffer of 5% when considering housing land supply, this was done without a detailed discussion on individual sites taking place. When a detailed exercise was undertaken at the recent Sandford appeal, Inspector Richards in his decision letter concluded that there was a record of persistent under delivery in the district and that a buffer of 20% should apply. This, indeed, was agreed to by the Council in the Statement of Common Ground for</p>

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			<p>the Land off Wentwood Drive, Weston-super-Mare appeal (APP/D0121/W/16/3151660).</p> <p>Gladman's view is that the correct interpretation of past delivery accords with that of the Inspectors for the Sandford and Wentwood Drive appeals and of course, this was the Council's view in the latter case. A 20% buffer should therefore apply to North Somerset.</p> <p>Gladman also continue to have concerns over the delivery rates applied by the Council for the large scale strategic sites at Weston Villages which appear to be overly optimistic, are unlikely to be realised and are significantly in excess of the delivery rates found in recent studies.</p> <p>75% of the proposed allocations and large sites with Planning Permission are located within Weston-super-Mare, a town that has struggled to deliver new housing growth in the past because of commercial viability and may not deliver units as quickly as the Council have suggested going forward because of issues of market saturation. A large number of units proposed in Weston-super-Mare are on large scale Sustainable Urban Extensions (SUEs). Over 6,500 units are proposed on two SUEs that are covered by a variety of consents ranging from no consent, to part outline or part full.</p> <p>Research undertaken recently by Savills on the delivery of SUEs on behalf of Barratt Homes concludes that on average, across all sites analysed, an urban extension site starts construction on the first phase of housing more than four years after the submission of an outline application. Analysis of the sites in the sample indicates that, once construction starts and in a strong market, annual delivery can be anticipated to be around 60 units in first year of construction, picking up to more than 100 units per annum in subsequent years and increasing to around 120 units. It should be noted that the above timescales do not take into account:</p> <ul style="list-style-type: none"> b) Pre application discussions/negotiations and preparation of the outline planning application; and c) The period between starting construction and delivering the first residential unit. <p>a) Time taken between the allocation of the site and starting preparation of the planning application;</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>On the basis of the issues highlighted above in terms of lead-in-times, delivery rates and market conditions, Gladman raise considerable concern with the deliverability of the Weston Villages SUEs.</p> <p>In addition, several of the allocations in Weston-super-Mare require large scale regeneration, the demolition and conversion of buildings within the Town Centre, as well as the potential relocation of some uses and remediation work to address potential contamination. These types of schemes are complex and difficult to deliver for a whole number of reasons and should be treated cautiously by the Council when considering delivery trajectories associated with the sites.</p> <p>This again calls into question whether the Council will be able to demonstrate a 5 year supply of housing land upon adoption of the Site Allocations Plan.</p> <p>Gladman are also of the view that the flexibility that is proposed to be introduced to the Remitted Policies, as recommended by Inspector Bore in his report, is insufficient to redress any significant failure in the delivery of the allocated sites.</p> <p>It is therefore suggested that given the uncertainty that surrounds the correct buffer, delivery rates, the current supply of housing land and the lack of flexibility, the Site Allocations Plan should allocate additional sites, in excess of the housing requirement, to ensure that the need for housing in the district is met or exceeded.</p> <p>It is highly likely that the Council will need to update its position on housing land supply before the Examination of the Site Allocations Plan. Therefore, Gladman reserve the right to assess in detail the housing land supply position at that stage.</p>
Churchill Parish Council	Churchill Parish Council	1190177//2	<p>Not all brown field sites should be allowed to be recycled to domestic developments, in the interest of sustainable communities. (Business rejuvenation within close proximity of new developments would better meet the sustainable policy to reducing vehicle commuting.) To that end, a data base of suitable sites to be retained within defined pedestrian range of allocated sites identified in the draft S&A be included.</p>

Name	Organisation	Comment ID	Comment Received
			<p>A statement should be included that no more allocation of sites will be made in any community once all such sites have been released as identified in this S&A draft until after 2025, and also that the proposed maximums of less than 25 houses be considered adjacent to the structure boundary be limited by 'Proven need' as identified by the community.</p> <p>(Therefore - can it be assumed that now 3 sites in Churchill having been predetermined before the adoption of the S&A document, that no more will be added between now and 2025?)</p> <p>We hold grave concerns about the Site Allocation Plan process in that sites that are scheduled in the plan at draft stage are effectively predetermined for development by Planners and NSC Executive. There is an unassailable presumption that they should be approved. This results in applications being approved without proper scrutiny of the individual sites or proper account being taken of the cumulative impact of other developments in the same village or in neighbouring settlements.</p>
K R J Sherrell		14808353//1	<p>The absence of any site allocations for Portbury and Strategy policies is disappointing given the services and facilities within the village, linkage to road networks and availability of sites that could provide for sustainable development without unduly compromising the appearance of the villages.</p>
Peter Gendle		14818561//1	<p>The continuing proposed piecemeal allocation for new housing development across North Somerset as it stands at the moment is a costly, time consuming and unequal process, that I suspect in many cases will not come to fruition and thus not produce the new quality housing so desperately needed. The only way that this situation to be rectified, with the least pain, is for the land area between Long Ashton and the Bristol boundary to be brought within the 'Site Allocations' plan. Anyone who knows the history of this land is aware of its low grade status both for agriculture and farming, with many large areas used for landfill over several years.</p> <p>One of the prime attractions of this particular allocation is that there would little need for a new road network or services</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>such as bus/rail routes etc as they are already there or close by. This land, if allocated, could be a 'game changer' for the Council and their duties in meeting the housing need. An opportunity like this only comes once in a life time and if not taken the Council will be doing a great disservice to its residents that will cause even more anguish than there is at present over this whole shoddy and indiscriminate allocation process.</p>
Kingston Seymour Parish Council	Kingston Seymour Parish Council	15298593//1	<p>Kingston Seymour Parish Council supports the direction of the Site Allocations Plan and requests that - in view of the additional development in the Yatton North End area - that plans are drawn up to provide a new junction at Kingston Bridge (roundabout or traffic lights) to accommodate the additional traffic that will be generated from Yatton to Clevedon and still permit our residents to safely access and egress the village via the Lampley Road.</p>
Viv Tomkinson	Congresbury Residents Association Group	15569185//3	<p>Para 4.9 states that the CS re-examination of remitted policies has resulted in proposals to allow residential growth adjacent to settlement boundaries which is 'likely to have a significant impact on supply over the remaining plan period, but this is not included in the figures set out at Table 1'. This again leads to questions about the purpose of the SAP given that development adjacent to settlement boundaries will be permitted irrespective of whether sites have been identified in the SAP. Given that the purpose of the SAP as stated in Paragraph 1.3 is to 'identify the detailed allocations required to deliver the North Somerset Core Strategy', surely the SAP should also identify where residential development adjacent to settlement boundaries may be considered. The purpose of the SAP should be to identify where development across NSC will be considered acceptable. If the impact of development adjacent to settlement boundaries is considered to potentially be 'significant' the absence of any of these sites being identified within the SAP surely results in an 'open door' and reduces the overall relevance of the SAP.</p>
gpb4keyes	Resident	15930113//1	<p>Infrastructures for the Lyefield Road / Newtons Road are already inadequate and not able to properly support the properties already along its boundaries, they are in fact Country Lanes and not roads as described. Without major investment to upgrading or create new roads the proposed</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>building plots are not supportable. I also believe current utilities that serve this area would not support more houses without major upgrades. Furthermore the proposed plots are on a slope and leading onto the flood plain, which in my opinion would have an unacceptable run off and add to the flooding of the fields below that currently flood each year. The proposed plot is in the green belt boundary surrounded by farmed fields, it is my opinion that the current plans and development for Weston Airfield and Locking Camp together with a number of brown field sites identified on the “Potential Residential Sites” would more than cover the Government targets.</p>
Nick Elliott	Self	15953345//1	<p>My main comments are:</p> <ul style="list-style-type: none"> • The extent of proposed and 'potential' housing development sites in Winscombe / Sandford and the surrounding area is horrifying and will change the character of the area entirely. The original reason for living in the area will have been lost, and new residents will not experience the area as it currently is. • Higher density housing should be concentrated in Weston, leaving the villages substantially unaffected. • I have seen no coordinated treatment of the traffic problem that will ne exacerbated by the proposed allocations. Reference to 'easy access to sustainable transport' will not come near covering the issue. • Flood risk must surely be increased, regardless of learned assessments.
Mr Turner		15955361//1	<p>My comments on this plan, which i would like to be considered are:</p> <p>1) increased road congestion. No consideration seems to have been taken into account of the limited access that can be achieved to weston-super-mare owing to the bristol channel restricting access to a very large town. Many of the interior roads are almost at gridlock with cars today. The large increased number of house will worsen this situation dramatically. WSM is already a commuter town for Bristol. These extra cars will impact</p>

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			<p>A) an increase to air pollution as many houses are low lying near M5 and WSM A370 dual carriageway B) cause on increased risk of emergency evacuation problems should there be a nuclear incident at Hinckley Point or a flood storm surge or tsunami (happened in 1700) along Bristol channel</p> <p>2) increased flood risk. This will increase with the large number of proposed houses being built on flood planes in WSM. There are several low slope rivers and streams in the building region. Heavy rain will dramatically increase the risk of flooding for region.</p> <p>3) unprepared infrastructure. WSM has recently closed the police station, is in the process of reducing the Worle library, has difficult limited access to doctors and dentists and a very high drug use problem causing strain on many local social services. All of these civil amenities will dramatically worsen with the large increased population.</p> <p>All of the above will reduce the satisfaction and enjoyment of the area for the existing population of residents, which does not seem to have been taken into account when these decisions are considered. If you require further information then please let me know.</p>
Pat Lynch		15961057//1	<p>My main comments are:</p> <ul style="list-style-type: none"> • The extent of proposed and 'potential' housing development sites in Winscombe / Sandford and the surrounding area is horrifying and will change the character of the area entirely. The original reason for living in the area will have been lost, and new residents will not experience the area as it currently is. • Higher density housing should be concentrated in Weston, leaving the villages substantially unaffected. • I have seen no coordinated treatment of the traffic problem that will ne exacerbated by the proposed allocations. Reference to 'easy access to sustainable transport' will not come near covering the issue. • Flood risk must surely be increased, regardless of learned assessments.

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D. E		15972289//8	<p>1) The site allocations plan and consultation is fundamentally flawed and fails to meet the sustainability criteria set out by Government guidance and by the Joint Council's Spatial Plan :</p> <ul style="list-style-type: none"> • This consultation has not asked the North Somerset electorate for views on whether it is more important to achieve sustainable housing development or more important to protect the green belt .This consultation has , therefore, ignored & failed to consult on the single most obvious location for new housing which would meet demand and satisfy sustainability criteria ie the area of land still within North Somerset district & immediately to the south of it's boundary with Bristol . (accessible by virtue of the newly constructed South Bristol Link road) • Consideration should be given to careful modification of the green belt so that it does not automatically rule out any possibility of providing genuinely sustainable development within the district of North Somerset. This would enable the provision of housing on land where the people of this district most need it and where they could get to work in the main employment centre of Bristol without major aggravation in terms of time , difficulty and cost. A green belt exclusion should be made south of Bristol to accommodate the 12,000 or so additional houses needed for this district (presently mostly allocated for WsM / Weston villages) . This green belt at this location has already been dissected by the construction of the new South Bristol Link road & the land adjacent to the road has been made readily accessible for sustainable development . • The area of North Somerset in the vicinity of the south bristol link road will also be served by other sustainable transport links including the Long Ashton Park & Ride , Metro West & the existing Avon ring road . The construction of the South Bristol link road was promoted jointly by North Somerset council & Bristol city council . North Somerset council had no objection to making a green belt exception to allow construction of the road and should now consider providing some benefit to their electorate by the promotion of a new housing settlement to be served by this road.

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			<ul style="list-style-type: none"> • The present site allocations proposals plan does not provide a balanced housing supply across the district of North Somerset. It provides next to nothing in the area where housing is most desperately needed ie north of Nailsea & within a reasonably short travelling distance to the jobs market in Bristol • To provide a residual balance of 12,700 new homes (paragraph 4.7 Table 1 of this SAP plan) in and around WsM is excessive for one area , would provide an unbalanced housing supply for the disyriect as a whole and would be against all sustainability policies of this plan.I do not think that it has been made clear to local residents that so many new homes are proposed , the general impression seems to be that the council is looking for just an additional 1,000 homes in the town centre. • A large proportion of the working population are currently being forced to commute the length of North Somerset - a 50 mile round trip from Weston-Super -Mare in order to work in Bristol . This has caused huge problems with increased congestion , particularly in WsM & on the M5 . People should be able to have a home reasonably close to where they work & they should not have to spend their lives travelling up & down motorways when there is an obvious solution to provide them with homes where commute times would be shorter , costs cheaper and where they would have the benefit of good public transport links into the main employment centre in Bristol.. • North Somerset Council have been pursuing an employment led strategy for 20 years or more with little success . There is not much work in the south of the district & WsM other than relatively low paid work in the care sector. In the meantime many thousands of houses have already been built in WsM and all these people are having to commute back out every day (2 cars per house on average ?) - it would be wise to see some significant employment actually arrive in WsM & a sustainable public transport system (including affordable Park & Ride) put in place before more homes are built in WsM . • Flooding is now an issue due to the fact that so much housing has been built on floodplain , the measures put in place cannot cope with the levels of

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			<p data-bbox="831 331 1453 432">flood water , with resultant chaos in WsM whenever there are periods of exceptional rainfall ie quite often.</p> <p data-bbox="727 539 1437 674">2) The sites proposed will fail to deliver sufficient affordable housing : The delivery of affordable homes has been identified by the joint spatial plan as of critical importance .</p> <p data-bbox="727 712 1453 1234">Thousands of new homes have been built in WsM area over the last 15 years so in theory there should be plenty of affordable homes available . However, this has not happened & what is apparent instead is a desperate shortage. This will not change with the sites proposed - the percentage of affordable homes provided will be greatly less than the standard 30% level because of the high cost of building on these brown field and flood risk sites. The rules which apply to private developers in respect of affordable housing are such that any sites with high building costs will be developed without the provision of the standard quota of affordable homes . That is to ensute the the builder is able to make at least some profit, however, it is also the reason why WsM is short of affordable homes - the majority of the area is high flood risk land , contaminated land and brown field sites.</p> <p data-bbox="727 1272 1461 1760">A strategy which would stand a better chance of providing affordable homes for the younger generations would be to utilise the current green belt exception policy & allow the allocation of land within green belt specifically & soley for affordable shared ownership homes. Providing green belt exception sites in the vicinity of the south bristol link road would both secure the provision of affordable homes and meet sustainable development objectives. The land here is low flood risk and numbers of affordable homes would be maximised if sites were to be allocated at this location. I would never propose releasing any green belt land of exceptional landscape value / ancient woodland or SSSI for building , but really if it's just field's currently being used for grazing I don't see why there should be a problem.</p>

Name	Organisation	Comment ID	Comment Received
North Somerset Internal Drainage Board (Simon Bunn)		16130337//2	<p>There also appears to be an inconsistency in the 'Site specific details/notes' section of the schedules. Not all sites that would require a flood risk assessment have been noted. In accordance with the NPPF all sites above 1 ha required a flood risk assessment to be undertaken</p>
2nd Lord Wraxall Will Trust		16149889//1	<p>These representations have been prepared by Savills on behalf of the Trustees of the 2nd Lord Wraxall Will Trust who have an interest in land at Backwell and Flax Bourton, identified on the enclosed plan.</p> <p>Whilst the land has not been previously promoted as part of the Sites and Policies Plan, given the emerging JSP for the West of England and the need to deliver a 'step change' in housing delivery across the District, it is our view that North Somerset as a whole will need to increase its strategic housing requirement and this in turn will require additional land for development, particularly at the service villages. The land shown on the enclosed plan is available for development and there is no physical or legal constraint to it contributing to meeting the future housing needs for North Somerset.</p> <p>These representations respond directly to the proposed policies on new development at Backwell, particularly the extent and location of land for new development.</p> <p><u>Strategic Housing Requirement and the Green Belt</u></p> <p>It is important that the emerging Development Plan for North Somerset reflects the emerging Joint Spatial Plan (JSP) for the West of England, particularly the strategic housing requirement. In this respect, we are aware of the evidence produced by the joint authorities within the Strategic Housing Market Assessment (SHMA) and the alternative analyses produced by objectors (including the house building industry and Business West). The evidence appears to strongly indicate that the need for housing exceeds the 105,000 dwelling target set out within the consultation document, and we agree with this.</p> <p>However, in order to deliver the increased housing requirement, there will inevitably be a need to review the Green Belt throughout North Somerset.</p> <p>Consistent with the recognition of Green Belt as a 'policy tool' within the NPPF, there are provisions in the NPPF</p>

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			<p>which enable Green Belt boundaries to be altered in ‘exceptional circumstances’. There is also explicit recognition that “when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development”. Whilst Green Belt is therefore a policy consideration of some weight, national policy clearly recognises the potential for change to the boundaries through the plan-making process and, where changes are proposed, requires that these support the delivery of sustainable development.</p> <p>In order to ensure that the emerging Development Plan, alongside the JSP plans properly for the identified strategic housing requirement, it is absolutely imperative that the primary and over-riding spatial objective must be the spatial application of the delivery of sustainable development rather than the retention of Green Belt for its own sake.</p> <p>On this basis, it is strongly considered that a measured and considered review of the Green Belt would be the most appropriate course of action to help deliver long term sustainable development in North Somerset.</p> <p>We contend that a review of the Green Belt is necessary to deliver long term sustainable development in North Somerset. In addition, it is contended that the only way to boost delivery of affordable housing is by increasing the overall housing requirement and this will inevitably require a Green Belt review.</p> <p>Furthermore, this review should be attentive to not just large scale strategic development opportunities but also opportunities for future commensurate growth at small scale settlements within the Green Belt, including Flax Bourton and Backwell. Such sustainable development opportunities are currently prohibited by Green Belt, however these opportunities should be considered on their merits using a balanced planning judgement, and a Green Belt review would enable this.</p> <p><u>Land at Backwell and Flax Bourton</u></p> <p>Whilst it is recognised that the land identified in the enclosed plan currently falls within the Green Belt, it is strongly considered that the land should be considered for future development as part of a Green Belt Review.</p>

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			<p>Both Backwell and Flax Bourton are sustainable settlements which hold a range of services and facilities to meet local needs. The range of local services and facilities available promote the settlements as walkable neighbourhoods, preventing the need to travel by car. Indeed, a Walking Route runs adjacent to some of the land identified on the enclosed plan. There is therefore an opportunity to make improvements to existing walking and cycling routes and improve the existing infrastructure as well as providing links between the centre of Backwell and new community facilities on the land north east of Backwell.</p> <p>There is convenient access to Nailsea and Backwell Station which provide links to the wider area via the mainline, including Bristol, a short distance to the north.</p> <p>The land to the north east of Backwell, and surrounding Flax Bourton, identified on the enclosed plan is in our view entirely appropriate and sustainable to accommodate a proportion of future growth. The land is physically connected to, and integrates with the existing built form. The land would not result in an unnecessary extension of the villages into the open countryside. In particular, the land adjacent to the A370 would represent a logical infilling of existing built development at Farleigh to the east and Backwell to the west.</p> <p>The land north east of Backwell is located a short distance from the centre of the village and within easy walking distance of local services and facilities. In particular, the land to the north east is located in close proximity to the both Backwell and Farleigh Primary Schools. Bus stops are located on the A370 at various locations providing access to the land identified. These bus stops are served by Service No's W1 and X1 providing regular public transport links between Bristol and Weston Super Mare via Backwell. In addition, Service No X8 provides links between Bristol, Nailsea, Clevedon and Portishead via Backwell.</p> <p>The land is suitable, available and achievable (deliverable and developable) in accordance with the requirements of the NPPF, and is therefore extremely well placed to accommodate the delivery of small scale residential development. The development of this land, at a scale commensurate with the role and function of the two villages, would assist in enhancing the sustainability of these settlements.</p>

Name	Organisation	Comment ID	Comment Received
			<p><u>Summary</u></p> <p>In summary, we have significant concerns over the soundness of the draft Sites and Policies Document.</p> <p>Given the strategic housing requirement will need to be reviewed as a result of the emerging JSP, it is considered that the Sites and Policies Document is premature. There will be a need for North Somerset to deliver a ‘step change’ in housing provision and this, in our view, will inevitably require a Green Belt review in order to deliver a robust spatial strategy.</p> <p>We contend that a review of the Green Belt is necessary to deliver long term sustainable development in North Somerset, including, for example, a boost delivery to the delivery of affordable housing.</p> <p>It is absolutely imperative that the primary and over-riding spatial objective for future growth in the District must be the spatial application of the delivery of sustainable development rather than the retention of Green Belt for its own sake.</p> <p>In addition to new large scale strategic development locations, the Council should also consider opportunities for small scale commensurate growth in smaller settlements within the Green Belt, on their merits. Sustainable settlements, including Backwell and Flax Bourton, should not be overlooked and instead should be revisited as part of a full Green Belt Review.</p> <p>The land surrounding Flax Bourton and Backwell identified in the enclosed plan is entirely suitable for future development and it is requested that this land is considered as part of the Sites and Policies Plan moving forward.</p>
Persimmon Homes Severn Valley	-	3361153//4	<p>In relation to paragraphs 4.1 and 4.2, as well as demonstrating a sufficient balance between immediately available and longer term sites and delivery of the minimum Core Strategy housing requirements, this plan must also ensure there are sufficient sites available to meet a 5 year housing land supply. We accept that the land supply will fluctuate over time, but it is important to demonstrate that the time of submission, a 5 year supply exists. In the light of the findings of appeal decisions at Sandford (APP/D0121/W/15/3139633) and Banwell (APP/D0121/W/15/3138816) the Agreed Statement of Common Ground submitted at an appeal in Bleadon (APP/</p>

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			<p>D0121/W/16/3142927) and common ground at the Appeal at Wentworth Drive, Weston-super-Mare (APP/D0121/W/16/3151660) there is substantial evidence that at the current time the Council can only demonstrate, at the most, a 4.2 year supply, but realistically substantially less. In the light of that we consider the plan is unsound.</p> <p>Paragraph 4.3 needs amending to reflect the amendments to the Core Strategy other remitted policies, which will permit development within, and subject to specified criteria, adjoining settlement boundaries.</p> <p>Paragraph 4.4 notes that the sites identified for consideration through the Housing and Economic Land Availability Assessment are assessed through the HELAA as to whether they have potential for development. However, we consider the process in North Somerset is not in accordance with Good Practice because sites are not assessed by an independent panel of appropriate experts. This means the Council are <i>'judge and jury'</i> on selection of sites and their subsequent allocations.</p> <p>In paragraph 4.5 it is not appropriate to suggest that the position is 'unusual' and imply this should influence the outcome of the plan. The fact is that since the beginning of the preparation of the Local Plan, the housing requirement has increased from 13,400 to 20,985 and as the final part of the full Local Plan, the Site Allocations Plan has to demonstrate that this figure will be delivered.</p> <p>Indeed, in order to deliver a minimum of 20,985 it is necessary to identify a greater number, generally by including a flexibility allowance. At present Table 1 identifies 21,051 dwellings, a surplus of 66 units or 3%. General practice is to include an allowance of a minimum of 10%. The approach taken in the Site Allocations Plan as set out in paragraphs 4.9 and 4.10 is to rely on residential growth of an appropriate scale to come forward on land adjacent to settlement boundaries through the Development Management Process to provide the necessary level of flexibility. The problem with this approach is that growth is not plan-led and timing and delivery is uncertain and out of the control of the Council, particularly if they continue to be unable to demonstrate a 5 year housing land supply, where they are vulnerable to losing appeals in locations where they would otherwise resist development. Indeed this has recently proved to have been the case with the Sandford Appeal, where 118 dwellings were</p>

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			<p>allowed on appeal in an infill village where the emerging Core Strategy Policy is only likely to permit up to 25 dwellings, provided they were otherwise satisfactory to the Council, which in the Sandford case they were not as the Council had considered the proposal to be unsustainable.</p> <p>Whilst the policy applies to residential sites of 10 or more units, Schedule 1 includes at least 2 sites of less than 10 – Plum Tree Farm, Summer Lane and Marine Hill House, Clevedon. To avoid double counting with windfalls this anomaly should be resolved</p>
Gleeson Strategic Land	Gleeson Strategic Land	4602593//2	<p>We would advocate allocating land to the south of Nailsea off Youngwood Lane for development.</p> <p>We have a long term interest in promoting the land and would be happy to liaise fully with local representatives of District Council, Nailsea Town Council and Backwell Village along with other stakeholders to ensure that any development on the site accords with national and local planning policies and other aspirations. I enclose two plans which show potential development of the land we have an interest in. This includes one plan showing the entirety of the land and another showing the area most closely related to the settlement boundary of Nailsea.</p> <p>In terms of impact on the character of the area both Nailsea and Backwell have been developed over a number of years and this is reflected in the variety of architectural styles and forms. Given the position of our land on the edge of Nailsea we do not envisage any detrimental impact on the form and character of the Town. Given the form of development within the settlement boundary it is envisaged that development will need to take place outside the existing settlement boundary. This is already acknowledged by the Council and this site offers the opportunity of providing for the much needed housing in the area.</p> <p>The development of the land of interest to Gleeson is completely outside the Green Belt.</p> <p>The land has a variety of uses historically and the agricultural use at present is mixed with the land being mainly pasture.</p> <p>Gleeson Developments Ltd are experts in promoting and realising development opportunities through the ever</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>increasing complexities of the planning system. Our expertise means that we have an excellent track record solving planning and other technical land based problems. This has resulted in us being able to forge good working relationships with a wide range of local authorities and public bodies involved in the development industry.</p> <p>The exact mechanism that will be utilised to deliver development on the site is yet to be fully considered. There are a number of detailed surveys that would need to be undertaken to inform any development proposals in the future. It is envisage that this process could take in the region of 1 to 5 years. We have already carried out an extensive landscape study (commentary on the proposed Strategic Gap attached) to ensure any future proposals are landscape led.</p> <p>During this time period it is hoped that issues such as contamination and the influence of mining patterns will be identified and mitigation incorporated into any development proposal.</p> <p>The land itself is closely related to Nailsea. The form of development will need to be considered to ensure that both Nailsea and Backwell settlements retain their character and identity whilst being developed in a sustainable manner. We are aware that the Environment Agency identifies that part of the land is liable to fluvial flooding and as such this will need to be managed in any identified development opportunity.</p> <p>In the interest of sustainable development and proposal will need to have a drainage</p> <p>strategy which seeks to manage surface runoff and to ensure that there are no adverse drainage implications outside the site. It is hoped that any investigations into this subject will result in solutions which may have beneficial water management effects on other areas in the vicinity of the site.</p> <p>Access to the land will need to be carefully considered, but there are obvious access points associated with the land which will be explored in more detail. This will all be considered in the longer term promotion of the land and considering the opportunities that exist. At the present time the exact form of development has not been decided upon. The development could include a mixture of housing types including affordable housing and commercial uses to ensure that the form of development is as sustainable as possible.</p>

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			<p>There may also be the opportunity to develop links with the railway station and improving access and car parking opportunities in the area.</p> <p>Gleeson's are committed to ensuring any development they propose accords with sustainable standards that are current at the time when any proposal is promoted. If through further consultation it is established that there is a desire to accommodate higher degrees of renewable energy sources or other 'green' technologies then this will be considered at that time.</p> <p>The town of Nailsea needs additional development to attract and retain young families in the area to ensure that facilities such as the school and other local services are maintained.</p> <p>Any employment opportunities on the site could be beneficial to the local population and go some way to reduce the degree of outward migration from the settlement. This would not only reduce congestion but also have the beneficial effects on the local economy. However we have not encountered a situation where any planned employment opportunities have been limited geographically as to where employees could be obtained. This we feel goes beyond the role of the planning system.</p> <p>We are not promoting any other land within NSDC administrative boundary and are committed to this site in the long term for delivery of sustainable well considered, inclusive development. The need for affordable housing in the area and housing in general is identified not only in the Backwell Community Plan 2010 but also the Nailsea Town Council Baseline review identifies the need for affordable housing, sheltered housing and housing for those who wish to downsize.</p> <p>The delivery of these units along with conventional market housing should ensure the continued viability and sustainability for Nailsea and Backwell. The delivery of housing should enable the younger and older members of the population to continue to live in the area. This coupled with employment opportunities can only be beneficial to the development of the community.</p> <p>Being an experienced developer Gleeson are also very aware of the need to survey, identify and mitigate/ improve habitats and environs to enhance existing ecological interest. It is</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>envisaged that with the land already available there is the opportunity for significant enhancements to be made to habitats in the locality.</p> <p>In terms of delivery it is envisaged that the site would offer an opportunity to deliver a discrete development in accordance with both national and local planning policies. The proximity to the train station, bus links and the town of Nailsea will reduce dependence on the car to a minimal.</p> <p>This approach is supported in the merging West of England JSP which identifies this area of Nailsea as being strategically important to the delivery of 3600 new homes. The designation of land as a strategic gap would not assist with the early delivery of such badly needed new homes.</p> <p>In summary Gleeson believe that the site off Youngwood Lane offers a deliverable opportunity for a mixed-use development. Any development proposal would have to be a sustainable attractive development which would enhance the area whilst providing for much needed housing and employment space.</p> <p>As experienced developers we are aware of the time needed to ensure that all technical matters are correctly addressed in terms of development opportunities. We will work closely with the community to formulate a proposal which sees the local area flourish without adversely affecting the attractive nature of its surroundings.</p>
Cresten Boase		5118977//1	<p>The Policies Map does not include the Chestnuts (24 dwellings) at Winscombe, full consent granted.</p>
Highways Agency (S Walsh)		8141345//2	<p>We note the reference in Policies SA1 and SA3 to sites having to take into account site specific requirements which should be set out in the site allocation information. This policy cross references to the site list provided in Schedule 1 and 3, which identifies residential sites of 10 or more units. This limit does not present any particular concerns for Highways England, however, it is noted that the policy states that the Schedule should include any ‘specific site-related requirements or key considerations to take into account’. However the schedule only includes some general notes and does not identify any site specific requirements, such as what</p>

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			<p>new or improved transport infrastructure will be required to support their delivery, which would be useful. Therefore it is considered that the policy wording is somewhat misleading.</p>
<p>North Somerset District Committee of CPRE</p>	<p>CPRE</p>	<p>931233//3</p>	<p>We disagree this housing target is an appropriate number for North Somerset, we have consistently argued against this increase and contend that the process to decide housing numbers is flawed. Our recent CPRE publication ‘Set up to Fail’ – why housing targets based on flawed number threaten our countryside’ and Housing Vision and Tibbalds ‘Smarter SHMAs a view of objectively assessed need in England’ commissioned by CPRE explains why. Given this number has been imposed we offer comment on this subsequent Site Allocations Plan.</p>

Section

Policy SA2 Settlement Boundaries

Name	Organisation	Comment ID	Comment Recieved
Wrington Parish Council	Wrington Parish Council	1019201//3	<p>We support the retention of defined settlement boundaries and the principle of this policy. However, we object to the second paragraph in the policy statement, which is misguided and unnecessary. This should be deleted, or amended to read:</p> <p>‘The extension of a residential curtilage will be permitted provided that it does not extend outside the settlement boundary and would not harm the character of the surrounding area or the amenities of adjoining occupiers.’</p> <p>As it stands the policy wording and its interpretation is too subjective, particularly so as there is no limit proposed for any ‘extension into the countryside’. An alternative would be a defined physical limit to any extension outside the curtilage and with this always requiring a planning application so that neighbours, the parish council and other interested parties are provided with the opportunity to comment. This should not be considered to be permitted development.</p>
Gladman Developments Ltd	Gladman Developments	11199745//3	<p>Whilst it is recognised that the settlement boundaries in North Somerset are established in the Core Strategy, Gladman object to their use as they are fundamentally contrary to the advice set out in the Framework. The Framework is clear that development which is sustainable should go ahead without delay. The use of settlement boundaries to arbitrarily restrict suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework.</p> <p>Settlement boundaries are arbitrary lines on a map that do nothing more than delineate the existing extent of the settlement within which certain policies of the Plan apply. They are also inflexible to adapt to changing circumstances as required by the Framework, for example if the Council is not meeting its housing requirement, has problems with housing delivery or has a deficiency in the 5-year housing land supply.</p>

Name	Organisation	Comment ID	Comment Recieved
			Criteria based policies that set out what the Council consider to be sustainable development provide a Framework consistent way of regulating development and if a scheme is deemed to be sustainable then it should come forward regardless of whether it is inside or outside of an arbitrary line.
Churchill Parish Council	Churchill Parish Council	1190177//3	CPC supports the retention of pre-existing settlement boundaries para 4.12 and 4.13.
K R J Sherrell		14808353//2	There is opportunity for additional allocations and amendment of the settlement boundary, such as in Portbury and Pill, which would not conflict with these objectives.
Viv Tomkinson	Congresbury Residents Association Group	15569185//5	Para 4.13 - Policy SA2 - the wording needs to be amended to include reference to only permitting development outside of settlement boundaries in locations which are sustainable and compliant with acceptable walking distances to local amenities identified by the Chartered Institution for Highways and Transportation.
Persimmon Homes Severn Valley	-	3361153//9	<p>Persimmon Homes Severn Valley objected to the approach to settlement boundaries in the consultation draft of the Site Allocations Plan and we note that the supporting text has been substantially revised. However, the approach taken in the publication version is completely illogical and without evidence to support it for the following reasons:</p> <p>Firstly the consultation draft said on page 17 <i>‘given that only limited development is envisaged outside the towns it is considered that there is no justification for a comprehensive view of settlement boundaries.’</i> In responding to comments the Council confirmed on page 17 of the Consultation Statement that <i>‘a further review of settlement boundaries will be undertaken as part of the new Local Plan which looks ahead to 2036.’</i> Paragraph 4.10 of the submission version now says <i>‘settlement boundaries in North Somerset have been well established through a succession of planning documents and are reviewed when new plans are prepared.’</i></p>

Name	Organisation	Comment ID	Comment Recieved									
			<p>However, paragraph 4.12 says <i>‘the settlement boundaries have been reviewed as part of the Site Allocations Plan and remain largely fit for purpose.’</i> Despite this there is no evidence document which sets out a clear and comprehensive settlement boundary review to support this statement. Further, if the conclusion of this unsubstantiated review is that boundaries remain <i>‘largely fit for purpose’</i> this is hardly a ringing endorsement that no changes to settlement boundaries are necessary. Paragraph 4.11 says <i>‘the primary function of the settlement boundary is to prevent sprawl and concentrate development appropriate to the scale and needs for community.’</i> In the absence of a transparent review it is impossible to judge whether this has been achieved, particularly when the proposed allocations are compared to the results of the evidence that has been produced in the comprehensive settlement sustainability assessment.</p> <p>There is also no evidence to justify why 219 houses in Churchill, 696 in Yatton and only 65 in Backwell are appropriate. Indeed where evidence exists it suggests a different conclusion. In particular, the background document <i>‘Assessing the sustainability and settlement hierarchy of rural settlements in North Somerset’</i> and the subsequent review presented in the Executive Committee Report in October 2016 clearly identify Backwell as the most sustainable village in North Somerset, whereas Churchill and Yatton are identified as environmentally sensitive. In total, Backwell has 6 green RAGs and 2 ambers, Winscombe 1 green and 7 ambers, Churchill 7 ambers and 1 green and Yatton 3 greens, 4 ambers and 1 red. There is clearly no correlation between the sustainability assessment and the allocations for each village, as further illustrated in the table below, which for comparative purposes allocates a score of three for a green, 2 for amber and 1 for red in Appendix D of the original report (February 2016).</p> <table border="1" data-bbox="727 1585 1455 2022"> <thead> <tr> <th colspan="3" data-bbox="727 1585 1198 1778">Relative Settlement Sustainability Compared with Total Housing Allocations</th> </tr> <tr> <td data-bbox="727 1778 1198 1832"></td> <td data-bbox="1198 1778 1318 1832"></td> <td data-bbox="1318 1778 1455 1832"></td> </tr> <tr> <td data-bbox="727 1832 1198 2022"></td> <td data-bbox="1198 1832 1318 2022">Total RAG Rating</td> <td data-bbox="1318 1832 1455 2022">Proposed Dwellings</td> </tr> </thead> </table>	Relative Settlement Sustainability Compared with Total Housing Allocations							Total RAG Rating	Proposed Dwellings
Relative Settlement Sustainability Compared with Total Housing Allocations												
	Total RAG Rating	Proposed Dwellings										

Name	Organisation	Comment ID	Comment Recieved		
			Backwell	22	65
			Long Ashton	19	0
			Yatton	18	696
			Winscombe	18	199
			Congresbury	17	68
			Easton-in-Gordano/Pill	17	0
			Churchill	17	219
			Wrington	16	0
			Banwell	15	0
			Sandford	15	0
			Locking	15	0
			Claverham	13	0
			Bleadon	13	42
			It is important that the proposed settlement boundaries are properly examined at the Site Allocations Planning Examination in relation to the settlement sustainability		

Name	Organisation	Comment ID	Comment Received
			<p>appraisal and the settlement hierarchy. When the issue was properly examined at the recent Sandford Appeal (APP/D0121/W/15/3139633) the settlement hierarchy and the settlement boundary of Sandford were set aside, which resulted in permission for 180 units in an infill village.</p> <p>In commenting on the consultation draft Persimmon Homes Severn Valley said that whether or not a full boundary review was undertaken, in any event, the boundaries should be amended to include the allocated sites. In response to the Consultation Statement, the Council said <i>‘the preferred approach is to retain settlement boundaries – otherwise the practical operation of the new Core Strategy approach will be difficult to deliver if sites are in effect assessed adjacent to allocations and not the settlement edge.’</i></p> <p>We note that whilst might be the Council’s <i>‘preferred’</i> approach it does not necessarily mean it is the right approach, as demonstrated by other parts of the Local Plan. For example, paragraph 4.11 says <i>‘settlement boundary is defined the areas where housing policies apply’</i> so therefore the Local Plan Housing Policies (ie those policies in the Core Strategy, Site Allocations Plan and Development Management Policies Plan) do not apply within the other allocated sites. It also means the policies that do apply to the allocated sites are countryside policies. This is a recipe for confusion where different policies apply in different parts of what is then a continuous built up area. If the principle reason for doing it is the fear that there will be pressure to allow further development adjacent to the allocated sites, this should be controlled through other policies of the Local Plan and by ensuring sufficient land is allocated to maintain a 5 year housing land supply.</p>
St Modwen Properties PLC	-	3568545//3	<p>Policy SA2 also refers to the proposals map which identifies residential sites of 10 or more dwellings. We are concerned that there is inconsistency between the existing permission for Locking Parklands and the proposals map for Locking Parklands. We also note that significant parts of the site and existing residential areas of Flowerdown and Locking Grove adjacent to the site appear to be designated as proposed employment sites rather than proposed residential or existing residential areas. The map therefore requires a review against the existing permission and position on the ground</p>

Name	Organisation	Comment ID	Comment Received
Mrs C Parfitt		8112641//1	<p>Amend settlement boundary at Church Road, Dundry (as shown on attached Plan) to reflect recent prior approval for change of use from agricultural building and land to residential (Class C3). This would also enable the change of use to residential of other farm buildings which would preserve their long term future and provide environmental benefits for the local community and neighbouring residential properties. It would also provide affordable housing for family members of the present owner.</p>
Thatchers Cider Co Ltd		8132929//1	<p>These representations relate to Myrtle Farm and the adjoining Thatchers premises at Station Road, Sandford.</p> <p>Previous representations were made in relation to the Site Allocations Plan March 2016 consultation, under comment ID: 8132929//1. these related to then proposed changes to the settlement boundary for Sandford in the vicinity of Myrtle Farm. An objection was made to those proposed changes.</p> <p>It has been noted that, under item 11 of the agenda for the Council's Executive Committee on 18 October 2016, that in in Appendix 5 a document entitled "Plan showing significant changes to the Policies Map" included a plan for Sandford which showed (by black hatching) "land to be included in the settlement boundary as detailed in NSRLP 2007". This, in effect, confirmed that there would be no change to the settlement boundary at this point, as requested by the respondent.</p> <p>Policy SA2 now relates to the issue of settlement boundaries and states that these are as shown on the Policies Map. However, when viewing the Policies Map, the boundary does not correspond with the position as per the Appendix 5 document referred to above. It is assumed that this is a mistake and that the boundary will be confirmed and shown to be consistent with the above position. If otherwise, then the respondent continues its objection.</p>
North Somerset District Committee of CPRE	CPRE	931233//4	<p>We support the retention of defined settlement boundaries as a well-established planning tool to direct development to towns and settlements rather than open countryside.</p> <p>We are concerned to read of the relaxation of settlement boundaries through the following policy change <i>'The</i></p>

Name	Organisation	Comment ID	Comment Recieved
			<p><i>extension of a residential curtilage, including the extension into the countryside of the curtilage of a dwelling located within a settlement boundary, will be permitted provided that it would not harm the character of the surrounding area or the amenities of adjoining occupiers</i>'. The proposed policy does not define the extent of the extension or conditions which may be applicable to the site</p>

Section

Policy SA3: Mixed use allocations

Name	Organisation	Comment ID	Comment Received
Wrington Parish Council	Wrington Parish Council	1019201//4	The policy wording here appears minimal. We suggest that Schedule 3 could be more clear in highlighting mixed use sites; ideally these should be listed separately.
M Stowell		14828417//2	<p>It is considered that land and buildings at Portbury House Farm, Davis Lane, Clevedon, should be included in a new mixed use allocation in order to achieve the following long term benefits:</p> <ul style="list-style-type: none"> • Improved access to the site from Davis Lane • Removal of incongruous modern farm buildings • Sympathetic development of listed buildings, including conversion of curtilage listed buildings • Commercial development between listed buildings and Clevedon 5/20 • Sustainable location • Sustainable drainage solution • Scope to achieve environmental improvements • Valuable contribution towards housing and employment needs of the area <p>These comments should be read in conjunction with comment ID: 14828417//1 which objects to the removal of part of the land at Portbury House from the employment allocation.</p>
Persimmon Homes Severn Valley	-	3361153//10	<p>In commenting on the Consultation Draft Persimmon Homes Severn Valley requested that for clarity and certainty Schedule 1 should specifically identify both SA2 (now SA1) and SA3 sites. That amendment has not been incorporated but we now consider it is unnecessary.</p> <ol style="list-style-type: none"> 1. Both the supporting text and Policy SA3 itself are confusing and superfluous for the following reasons: <ul style="list-style-type: none"> • The definition of what constitutes a mixed use site is unclear. In one paragraph three different descriptions of mixed use are included: • Residential and employment;

Name	Organisation	Comment ID	Comment Recieved														
			<ul style="list-style-type: none"> • Employment and community uses; • Community, social and economic infrastructure. <p>Indeed the schedule itself is unclear. It specifically identifies seven mixed use sites (Winterstoke Village, Parklands Village, Birnbeck Pier, Nightingale Close, south of Herluin Way, Old Mill Road and Bleadon Quarry). However there are at least another seven sites which also include a mix of uses as follows:</p> <table border="0"> <tr> <td style="padding-left: 40px;">T J Hughes</td> <td style="padding-left: 100px;">Residential, retail, restaurant</td> </tr> <tr> <td style="padding-left: 40px;">Station Gateway</td> <td style="padding-left: 100px;">Residential, car park, primary school</td> </tr> <tr> <td style="padding-left: 40px;">West of Winterstoke Road</td> <td style="padding-left: 100px;">Residential, employment, recreation</td> </tr> <tr> <td style="padding-left: 40px;">Mill Cross site</td> <td style="padding-left: 100px;">Residential, health</td> </tr> <tr> <td style="padding-left: 40px;">Trendlewood Way</td> <td style="padding-left: 100px;">Residential, retail</td> </tr> <tr> <td style="padding-left: 40px;">North west Nailsea</td> <td style="padding-left: 100px;">Residential, primary school, recreation</td> </tr> <tr> <td style="padding-left: 40px;">Arnolds Way</td> <td style="padding-left: 100px;">Residential, primary school</td> </tr> </table> <p>Then there are three sites which specifically require open space with housing (Cobthorn Way, Pudding Pie Lane and Northend, Yatton).</p> <p>All of this adds to the confusion of what is a mixed use site.</p> <ul style="list-style-type: none"> • Different uses are to be developed in tandem on large sites which are not defined. If this relates to the normal definition of large sites, it is important to be clear on this because the adopted Development Management Plan uses different definitions for large sites within policies ranging from 10 to 100. We also note that there is a considerable range in the size of identified mixed use sites from 20 at Old Mill Road, Portishead to 3,700 at Parklands Village, Weston-super-Mare. • It is not clear what the policy itself is seeking to achieve. The only specific requirement it contains is that <i>‘proposals must take into account the specific site related requirements as set out in the schedule.’</i> That is 	T J Hughes	Residential, retail, restaurant	Station Gateway	Residential, car park, primary school	West of Winterstoke Road	Residential, employment, recreation	Mill Cross site	Residential, health	Trendlewood Way	Residential, retail	North west Nailsea	Residential, primary school, recreation	Arnolds Way	Residential, primary school
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Name	Organisation	Comment ID	Comment Received
			<p>a general requirement which replies to all sites and is already required by Policy SA1.</p> <p>The other difference between Policy SA1 and SA3 is that SA3 refers to '<i>any other relevant policy considerations</i>' which differs from '<i>key considerations</i>' in SA1. '<i>Any other relevant policy considerations</i>' is unnecessary and should be deleted because the plan and all its policies apply as a whole, as agreed by the Council in amending Policy SA1 (previously SA2 in the consultation draft version) and set out in the Consultation Statement page 22 which deletes '<i>all allocations will be expected to comply with other relevant policy considerations, including affordable housing.</i>'</p>
Highways Agency (S Walsh)		8141345//3	<p>We note the reference in Policies SA1 and SA3 to sites having to take into account site specific requirements which should be set out in the site allocation information. This policy cross references to the site list provided in Schedule 1 and 3, which identifies residential sites of 10 or more units. This limit does not present any particular concerns for Highways England, however, it is noted that the policy states that the Schedule should include any '<i>specific site-related requirements or key considerations to take into account</i>'. However the schedule only includes some general notes and does not identify any site specific requirements, such as what new or improved transport infrastructure will be required to support their delivery, which would be useful. Therefore it is considered that the policy wording is somewhat misleading</p>

Section

Policy SA4: Employment Allocations

Name	Organisation	Comment ID	Comment Received
Mead Realisations Ltd	Mead Realisations Ltd	1074881//3	<p><u>Land to the East of the M5, Weston-Super-Mare</u></p> <p>Due to its proximity to Junction 21 the site is a logical location for an employment-led mixed use development.</p>
Mead Realisations Ltd	Mead Realisations Ltd	1074881//5	<p><u>Land off Sand Road, Kewstoke</u></p> <p>The site lies directly to the east of the Sand Bay Holiday Park and therefore represents a logical location for a new holiday park development.</p>
Mead Realisations Ltd	Mead Realisations Ltd	1074881//7	<p><u>Land to the South of the West Wick Roundabout Weston-super-Mare</u></p> <p>The site falls within the boundary of an outline planning permission (Ref: 12/P/1266/OT2) for a large mixed-use development that was granted permission in 2015 and is currently shown as remaining in agricultural use. However, due to its location in respect of the proposed development to the south and the highway network the site is a logical location for employment development.</p>
Stowells		14817761//1	<p>REPRESENTATIONS ON BEHALF OF STOWELL CONCRETE LTD</p> <p>PROPOSED EXTENSION TO DRAFT EMPLOYMENT ALLOCATION</p> <p>LAND ADJACENT TO STOWELL CONCRETE WORKS, ARNOLDS WAY, YATTON, BS49 4QN</p> <p><u>Introduction</u></p> <p>On behalf of our client, Stowell Concrete Ltd, we wish to make further representations upon the recently published Sites and Policies Plan Part 2: Site Allocations Plan Publication Version for North Somerset.</p> <p><u>Background</u></p>

Name	Organisation	Comment ID	Comment Received
			<p>We previously submitted representations on our client's behalf to the Site Allocations Plan (SAP) draft consultation in April 2016 to support an extension to the existing safeguarded employment site at Stowell Concrete under Policy SA5. These representations identified the need for Stowell Concrete, an independent family run business, to expand its existing concrete works to accommodate the growing demands of the business. The submission demonstrated the site's suitability for employment development confirming there are no physical constraints or known contamination at the site and it benefits from existing access and utilities provision.</p> <p>Furthermore, reference was made to the recently secured planning permission for SMART Systems on land to the west of the site for a further extension to their industrial warehouses (planning application ref. 15/P/0957/F). Completion of this development results in the site being surrounded on all sides by land comprising existing/permitted employment uses.</p> <p>Our earlier representations dated 25 April 2016 should be read alongside these representations.</p> <p><u>Further Representations</u></p> <p>Despite our previous representations we note that at the current time the employment allocation has not been extended to include our client's site. We note that the reason given for not extending the existing employment allocation is:</p> <p>"Although the provision of additional employment land in Yatton would be welcomed, the extra traffic in particular HGV's would put increasing pressure on the High Street and surrounding roads."</p> <p>It is our understanding that no technical work has been undertaken or that there is any evidence available to support this reason. In particular, we understand no liaison has been had with highways officers within the Council. Clearly, therefore the current reason for excluding the site is not sound, justified or evidenced in anyway.</p> <p>In light of the above, to assist the Council's consideration of the highways impact of the potential extension of the concrete works onto the subject site, our client has instructed WYG Transport, a transport specialist, to assess the potential impact of the extension. The scope of the assessment has been agreed with the Council's Highways Officer.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>The transport assessment takes into account current site operations and assumes that there would be an approximate forecast 25% uplift in production if the site were extended. On this basis, there would be an additional 4 HGV movements per hour. Overall, this equates to one extra HGV movement every 15 minutes. As such, the slight increase in HGV movements will have a negligible impact upon the continued operation of Yatton's highway network.</p> <p>The assessment also considers the increase in staff car trips as a result of the concrete works being extended. The existing concrete work operations commence at 05:00 and the majority of existing staff begin work before 8:00 with only two starting between 08:00 and 09:00. Similar working patterns are expected should the concrete works expand and therefore many of the additional staff would work shifts, resulting in no adverse impact upon the highway network.</p> <p>In light of the available evidence we trust the Council will reconsider their appraisal of the subject site and consider it appropriate to be included within the SAP as an extension to Policy SA5 existing employment site.</p> <p>As an aside we also note that for some reason, despite the Council granting planning permission for a significant extension to the neighbouring SMART Systems warehouses, that land has also not been included as an employment site within the Publication Version of the SAP. The extension is currently being built and will enclose the subject site creating an island surrounded by development and will separate it from the wider countryside.</p> <p><u>Conclusion</u></p> <p>The subject site provides the only opportunity for Stowell Concrete to extend and improve their existing concrete works, whilst meeting increasing business demands and remain as an important local employer in Yatton.</p> <p>The Council's reasons for dismissing the site are not supported by any evidence. In order to inform the Council we have undertaken a Highways Impact Assessment (the scope of which has been agreed with the Council's Highways Officer). The technical report does not support the un-evidenced views of the Council.</p>

Name	Organisation	Comment ID	Comment Received
			<p>The assessment demonstrates that an extension to the concrete works would have a negligible impact and would therefore not put unacceptable “pressure” on the High Street and surrounding road network. The subject site is both suitable and available for employment purposes and given appropriate evidence has now been provided demonstrating an extension to the concrete works would be acceptable from a highways perspective, it should now be included within the existing employment land allocation in the emerging Sites and Policies Plan Part 2: Site Allocations Plan.</p> <p>We request that we be kept fully informed of all further consultations as part of the Sites and Policies Plan and all other future Development Plan documents produced for consultation. In the meantime please do not hesitate to contact us should you have any queries or require any further information.</p>
Persimmon Homes Severn Valley	-	3361153//11	<p>In commenting on the consultation draft of the Site Allocations Plan Persimmon Homes Severn Valley said that consideration should be given to combining Policy SA5, either with Policy SA4 to deal with the use of non B class uses on safe-guarded and proposed employment sites, or with SA6 to deal with replacement of safe-guarded employment and retention of economic uses.</p> <p>In responding the Council identified 3 options (page 62 of the consultation statement) as follows:</p> <ul style="list-style-type: none"> • SA4 could be merged with SA5 to create a policy similar to E5 of the RLP. This could remove the safe-guarded sites and instead assume that all existing B class sites should be safe-guarded; • SA4 and SA5 could be merged maintaining separate schedules for proposed allocations and safe-guarded sites. One of the main reasons for separating the policies was to avoid confusion; • SA5 and SA6 are merged with separate criteria as currently set out in SA5 shown as a separate sub-set with the policy.³ Having set out these options the Council retained Policies SA4, SA5 and SA6 as separate policies without further assessment.⁴ Which of these options is chosen is dependent on the following issues, which in some respects pull in opposite directions:

Name	Organisation	Comment ID	Comment Recieved
			<p>Should the policies relating to new employment allocations and existing employment use be consistent in the criteria set out for non B class uses, in which case the wording in SA4 is more comprehensive? This suggests SA4 and SA5 should be combined.</p> <p>What are the criteria for differentiating whether an employment site is an SA5 site or an SA6 site? We accept the Council's response that SA6 includes a wider range of economic uses which seems to go beyond all existing employment sites not listed in Schedule 3. However, nowhere are any criteria, set out either in the plan or in the evidence base background documents, to show how the two categories are differentiated or provide a definition '<i>land in existing economic use</i>'. Without this clarity it is suggested Policies SA5 and SA6 could be combined.</p> <p>What is equally not clear is why the criteria for assessing non B uses should be different on allocated and existing employment sites (Policies SA4 and SA5).</p> <p>Paragraph 4.32 which supports Policy SA5 is also confusing. It says loss of existing strategic employment sites would be contrary to Core Strategy objectives, but goes on to say that replacement of poorly located, run down, incompatible sites '<i>is acceptable and in some cases a benefit</i>'. However, Policy SA5 then appears not to allow such sites to be replaced (proposals for non B class uses will <u>only</u> be permitted if they are ancillary, have a direct relationship or are a small scale supporting service) but Policy SA6 would allow replacement (an alternative use <u>will be permitted</u> where it would not cause harm, has been unsuccessfully marketed and would not harm economic aspirations).5. Given the degree of conflict and confusion in these policies and the supporting text we find it impossible to suggest any specific alternatives. In general terms what is required is</p> <ol style="list-style-type: none"> 1. Policy to allocate proposed employment sites; 2. Policy to safeguard existing employment sites, allowing for exceptions; 3. Criteria for dealing with non B class uses on both new and existing B1, B2 and B8 sites; 4. A proper definition of '<i>land in existing economy use and how it can be incorporated in the above suggested policy framework.</i>'

Name	Organisation	Comment ID	Comment Recieved
Persimmon Homes Severn Valley	-	3361153//12	<p>Notwithstanding the general comments on Policies SA4 to SA6 Persimmon Homes Severn Valley have the following comments on Policy SA4.</p> <p>This policy needs to be considered in the context of whether it will deliver the employment-led approach established in the Core Strategy</p> <p>Firstly looking at the overall approach, policy CS20 makes it clear that the focus for delivery of employment development will be at Weston-super-Mare and to help achieve this it establishes a particular requirement for 1.5 jobs per home on residential sites in Weston-super-Mare. CS20 also says <i>'residential development will be provided in step with employment opportunities'</i>. Persimmon Homes Severn Valley have worked with the Council and have been successful in attracting new employment opportunities at Weston Villages and have gained practical experience of implementing the policy. We therefore recognise and support the change in emphasis in the Site Allocations Plan of the practical difficulties of securing employment development to meet the policy requirements. In particular that <i>'not all supply is equal and readily available'</i> and <i>'sites may require significant investment to unlock and may have a long lead-in time particularly if linked to a wider regeneration strategy in an area.'</i> Paragraph 23 of the employment allocation review background document then refers to this in relation to Weston Villages – <i>'significant investment is required to bring forward much of this supply for example at Weston Villages meaning that the supply will likely be delivered incrementally over the plan period as sites become deliverable.'</i> This recognition of the practical issues involved in bringing sites forward is important and helpful and supports the more flexible approach being pursued in the delivery of individual proposals.</p> <p>However, for plan-making purposes, it is important to ensure the allocations set out in the Site Allocations Plan will deliver the Core Strategy requirements and assess how this will be achieved. As with residential proposals, the Site Allocations Plan merely lists employment sites (in schedule 2) based partly on an assessment of individual sites set out in the employment allocation review. There is no assessment of whether these sites will, if delivered, meet the CS20 requirement. CS20 seeks to provide 114 hectares for B1, B2 and B8 uses, whereas schedule 2 identifies 85.51 hectares. Unlike for residential development completions are not identified, so it is impossible to assess whether the overall quantum of employment land identified in</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>CS20 will be delivered by the additional 85.51 hectares identified in schedule 2.</p> <p>The next issue is that the CS20 requirement was based on meeting the self-containment strategy in relation to 14,000 dwellings. Now that has been increased to 20,985, it suggests the employment requirement should be reassessed, but there is no evidence that this has been done. This again has particular impacts in Weston-super-Mare, where CS20 specifically links the amount of employment land required to the housing allocation through the formulaic requirement to provide 1.5 jobs per home. In that respect we recognise that policy CS30 required the provision of at least 37.7 hectares of B class employment to provide 1.5 jobs per home for 5,500 homes at Weston Villages, whereas schedule 2 now identifies 41.6 hectares in total (17.6 hectares at Locking Parklands 24 hectares at Haywood Village) to provide 1.5 jobs per home for 6,500 new homes. There is no analysis of whether this increased employment provision (plus 18%) is sufficient to meet the policy requirements. This is not aided by the fact that the control in Policy CS20 is based on numbers of jobs, but the delivery requirement in CS30 and the Site Allocations Plan is based on the amount of land and there is no attempt to reconcile the two different measures. In simple percentage terms, the increase in housing is 18.2% and the increase in employment land is 10.3%.</p> <p>Whilst the Inspector into the examination of Policy CS13 concluded his consideration of employment needs/sub containment <i>‘in my view there are sound planning reasons for not seeking to equally match housing provision to the provision of employment’</i>, he was equally clear that the Council should be assessing the impact of the self-containment strategy. The Inspector’s Report said:</p> <p><i>‘In my opinion an improvement of about 6% in the “self-containment” rate which will derive from a housing requirement of circa 21,000 would still be worthwhile and will be compatible with the overall strategy of “self-containment” in the adopted parts of the Core Strategy. This move towards improvement in “self-containment” would be experienced in the short interim period before review. At the review stage, the Council would be in a better position to seek to pursue either a lower or higher rate of self-containment in the knowledge of the comprehensive and co-ordinated strategic approach to “self-containment” provided by the JSPS.’</i></p>

Name	Organisation	Comment ID	Comment Received
			<p>Whilst accepting that the Core Strategy Inspector referred to reconsidering the self-containment role at the plan review stage the preparation of the Site Allocations Plan provides an ideal opportunity to carry out an assessment now. This would be advantageous so that appropriate measures can be put in place well in advance to avoid any possible of a ‘brake’ being applied to housing delivery if the employment requirements at 1.5 jobs per home in CS20 is not delivered. In view of the significant investment in upfront infrastructure at Winterstoke Village, based on the allocation of 2,500 houses, it is absolutely fundamental that a continuous development programme is maintained in order to ensure recovery of the infrastructure costs, as well as ensuring continuous housing delivery in accordance with Government Policy. The policy approach requires continuous monitoring and again, whilst we accept that the Council are doing that, the preparation of the Site Allocations Plan provides them the opportunity to review delivery and if necessary rebase the delivery requirements of CS20 through the Site Allocations Delivery Plan.</p> <p><u>Specific Comments on Policy SA4 Wording</u></p> <p>The second bullet point requires proposals for non B use classes to be small scale, which is stated to be no more than 15% of the site area overall. There is no evidence to support the 15% figure, which therefore must be considered to be arbitrary. It also requires the application of a rigid figure when a more flexible approach might lead to more successful solutions where shared use of parts of the site are considered (for example parking). A percentage of the overall site might also not be appropriate if there is a high proportion of ‘lost land’ on the site, (for example the requirement for sustainable urban drainage or ecology areas).</p> <p>Persimmon Homes Severn Valley made the same comment at the consultation draft stage and at page 56 of the Consultation Statement, the Council accepted that the 15% figure is arbitrary but that any relaxation would weaken the Council’s ability to retain a stock of B class employment land and the arbitrary 15% figure is therefore retained. As the Council’s response demonstrates, there is no evidence to support the 15% figure and the proper test is whether the non B class uses provide a ‘<i>supporting service for the employment uses or employees</i>’ on a case by case basis. We consider the reference to a supporting ‘<i>service</i>’ rather than a supporting ‘<i>role</i>’ provides a sufficiently high test to give the Council enough control over excessive non B class uses on sites.</p>

Name	Organisation	Comment ID	Comment Received
			<p>The application of the second part of the policy and the last two bullet points needs to be clarified. It is not clear whether proposals need to satisfy one or both of the criteria. In our view the exceptions should apply on an either/or basis. If the planned B class use is not suitable there should then not be an additional requirement to demonstrate that the range and quality of available land is not adversely impacted. Equally if the range and quality of land available is not adversely affected it is not then necessary to demonstrate the B class use is not suitable.</p> <p>Persimmon Homes Severn Valley made the same comment at the consultation draft stage and at page 56 of the Consultation Statement the Council agreed with the comment and said '<i>the policy will be amended so that exceptions will apply on an either/or basis.</i>' However the policy has NOT been amended and following the above response and in the absence of any other explanation we consider the amendment should be incorporated.</p>
Portishead Town Council	Portishead Town Council	4193569//2	PTC is content that Gordano Gate has been identified as available for B use classes.
North Somerset District Committee of CPRE	CPRE	931233//5	<p>Policy SA3 Mixed Use Allocation</p> <p>Policy SA4 Employment Allocations</p> <p>Policy SA5 Safeguarded Employment Sites</p> <p>Policy SA6 Retention of Economic Uses</p> <p>Given North Somerset Council has an employment led policy, these policies would benefit from further detail and less flexibility to change designations when the imperative for North Somerset is to ensure the balance between employment and housing.</p>

Section Policy SA5: Safeguarded employment sites

Name	Organisation	Comment ID	Comment Recieved
Wrington Parish Council	Wrington Parish Council	1019201//5	<p>There is a weakness in the policy wording relative to the first sentence in para 4.32, which states; <i>'As well as allocating new employment sites it is equally important that existing employment sites that have good access are purpose built, modern and compatible with surrounding uses are retained in employment use'</i>.</p> <p>We agree, although there is no provision made in the policy for sites which have poor access, are now unsustainable in transport terms and which are incompatible with the surrounding land and uses. This is the arguably now the case with the Havyatt Business Park on the south side of Wrington, where the expanded commercial site impacts on the countryside, agricultural land and the Yeo and its banks (a designated Wildlife Site/SNCI). HGV traffic now associated with the Wrington industrial estates is unsuitable for the narrow access roads and creates potential hazards for car drivers, cyclists and pedestrians</p>
Viv Tomkinson	Congresbury Residents Association Group	15569185//4	<p>Para 4.32: We want to endorse the ambition that strategic employment sites should be protected for continuing employment use and also the suggestion that employment sites which are run down or poorly located should be converted for residential use ie the use of brownfield sites for housing development must be proactively promoted. We recognise that developers favour development of green field sites and would urge NSC to take a more creative and dynamic approach to promotion of the use of brown field sites. Indeed, if housing development companies are not interested in former employment sites, perhaps the council should consider taking the initiative themselves and using such sites for development of affordable housing.</p>
Persimmon Homes Severn Valley	-	3361153//13	<p>Policy SA5</p> <p>Notwithstanding the general comments on Policies SA4 to SA6 Persimmon Homes Severn Valley have the following comments on the specific wording in Policy SA5. Firstly the restriction on</p>

Name	Organisation	Comment ID	Comment Recieved
			<p><i>'only permitted'</i> is unnecessary and <i>'only'</i> should be deleted because proposals with either be permitted or they will not.</p> <p>Secondly the construction of the policy needs clarifying. Whilst there is the word <i>'or'</i> after the second bullet point there is nothing after the first and the addition of <i>'and/or'</i> or <i>'and'</i> or <i>'or'</i> is unnecessary.</p>
Portishead Town Council	Portishead Town Council	4193569//3	<p>PTC is content with its safeguarded employment sites and is pleased to note that the Severn Paper Mill site is included in this. Again we reiterate that Old Mill Road must also be included in this schedule.</p>

Section

Policy SA6: Retention of economic uses

Name	Organisation	Comment ID	Comment Received
Nailsea Unit Trust (c/o Ellandi LLP)	-	14604993//2	<p>Policy SA6 – is concerned with the transfer of land in existing ‘economic use’ to alternative uses. However, there is no definition of ‘economic uses’ provided within the policy or reasoned justification text. This omission will lead to ambiguity about the uses that are / are not protected by the policy. It is assumed that the policy is focussed on B Class uses and therefore this should be clearly stated.</p> <p>In addition, bullet point 2 of Policy SA6 deals with marketing of the site including for ‘alternative economic use’. It should be stated that ‘alternative economic use’ does not extend to retail and leisure uses which are town centre uses and subject to sequential and impact testing under separate policy requirements. It is important that the policy does not inadvertently conflate retail and leisure uses with what we believe is intended as ‘economic use’ i.e. traditional office, R&D, manufacturing and storage & distribution uses or combination thereof (the B Class Uses).</p>
Standard Life Investments		16123553//2	<p>Policy SA6</p> <p>Policy SA6 seeks to protect land in existing economic use from a change to other uses unless certain criteria are met. The criteria would appear to be likely satisfied by the redevelopment of the Old Mill Road (and Wyndham Way Retail Park) site for mixed use development in the manner expected by Schedule 1. However, the wording of Policy SA6 unnecessarily introduces a degree of risk to the delivery of development of the Old Mill Road site (and conceivably other sites) and therefore the effectiveness of Policy SA3 and/or Policy SA6.</p> <p>We consider the potential conflict between Policy SA3 and SA6 can be suitably resolved by the explicit recognition within Policy SA6 that land currently in economic use will be permitted to change if it is <i>allocated by other policies in the Plan.</i></p> <p>On the basis of the above, we submit that Policy SA3 / Schedule 1 and Policy SA6 cannot currently be considered sound, but</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>amendments to the policies as set out below, would render them sound.</p> <p>Policy SA6</p> <p>Amend policy text to read:</p> <p>"Land in existing economic use will be permitted to change to an alternative use <i>if it is allocated for alternative use(s) by another policy in the Plan</i>, or where it can be demonstrated that..."</p>
Tom Leimdorfer		936033//1	<p>There needs to be clearer criteria relating to the loss of employment sites to residential use within and around service villages and in rural areas. Temporary recessions and shifts in economic circumstances tend to lead to a loss of such employment sites, which cannot then be regained. While these my not be 'strategic sites' with regards to the whole districts, they are important to the specific locality.</p>

Section

Policy SA7: Local Green Space

Name	Organisation	Comment ID	Comment Received
Backwell Parish Council	Backwell Parish Council	1013153//1	<p>Site Allocation and LGS In Backwell</p> <p>Consultation of Sites and Policies Part 2 (Site Allocation Plan) Backwell Parish Council were very grateful to have the opportunity to be allowed to comment.</p> <p>Part of our submission last year was very specific reference to our N Plan with regards to areas of “special particular importance” to this Council and our residents, and when we read paragraph 4.36 on page 21 of the above Document that it is exactly what is indicated and that we have conform to that.</p> <p>On the same page (21), 4.37 and 4.38 again it seems to support our submission to protect a strip of land adjoining Backwell Recreation Ground, Moor Lane Play Area and Westleigh Infants School by giving those small areas LGS status. If need be one could split field 18 as shown in our original submission which we have copied it in to you again for the purpose of joining the other 2 areas, together in order to expand any future recreation facilities.</p> <p>All those clauses we suggest are in line with our submission but can be overruled by special circumstance, one being development for future housing.</p> <p>Shortly this Council like all other Council will be commenting on The West of England emerging joint spatial Plan and Joint Transport Study and that document you are proposing 3,600 homes in Nailsea and Backwell. Our share in Backwell is 800 homes on land adjoining the strip of land we are requesting for LGS, Page 25 – 4.56.</p> <p>Backwell PC have always known that there would be development on this particular land because TW have had options on it for over 12 years so we feel that we are not denying development as there is plenty of opportunity in the future expansion, what we are suggesting is, it would be a perfect time to allow some LGS and allow this area to enhance the 2 Recreation areas and Westleigh Infants School without forming a strategic gap.</p>

Name	Organisation	Comment ID	Comment Recieved
Gladman Developments Ltd	Gladman Developments	11199745//4	<p>Gladman note Policy SA7 and take this opportunity to remind the Council of the tests which need to be met when seeking to designate Local Green Space (LGS).</p> <p>Paragraph 77 of the Framework sets out the following in terms of when it is appropriate or not to designate land as a Local Green Space. “The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</p> <ul style="list-style-type: none"> • Where the green space is in reasonably close proximity to the community it serves; • Where the green area is demonstrably special to a local community and holds particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • Where the green area concerned is local in character and is not an extensive tract of land.” • <p>The Planning Practice Guidance (PPG) provides further guidance on LGS designations including paragraph ID. 37-015-20140306, “There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed”. However, paragraph 77 of the National Planning Policy Framework is clear that Local Green Space designations should only be used where the green area concerned is not an extensive tract of land. Consequently, blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name</p>
Viv Tomkinson	Congresbury Residents Association Group	15569185//7	<p>We strongly support the principles of Policy SA7 and congratulate NSC on recognising the need to protect these areas which are highly valued by their local communities.</p>

Name	Organisation	Comment ID	Comment Received
Persimmon Homes Severn Valley	-	3361153//14	<p>The starting point in considering designation of and policy relating to Local Green Space is that it is an <u>exceptional</u> designation. Paragraph 76 of the NPPF refers to this expressly as ‘<i>special protection</i>’ and paragraph 77 expressly states that ‘<i>it is not appropriate for most green spaces or open space.</i>’ Paragraph 77 then sets out a three point test which has to be applied, but even before that, there is a re-emphasis of the exclusivity of the designation: ‘<i>The designation should <u>only</u> be used</i>’.</p> <p>In addition further guidance in the paragraph 77 tests confirms that Local Green Space must be physically limited and constrained. The reference is to ‘<i>reasonably close proximity to the community it serves</i>’ and it cannot be ‘<i>an extensive tract of land</i>’.</p> <p>The third test in paragraph 77 is effectively two separate tests. It says the designation should only be used where the green area is ‘<i>demonstrably special to a local community</i>’ and then ‘<i>holds a particular local significance</i>’. This requires very strong <u>objective evidence</u> to demonstrate all these components rather than the simple description of the land included in the justification column of schedule 4 of the background document.</p> <p>The restrictive nature of the designation is further confirmed in NPPF 78 which says that Local Green Space should be consistent with policy for Green Belts. Effectively this requires the application of an exceptional circumstances test when considering the allocation of each area of Local Green Space.</p> <p>However there is then a further overriding test which must be applied. That is found in paragraph 76 of the NPPF which says ‘<i>identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in <u>sufficient homes</u>, jobs and other essential services.</i>’</p> <p>Further guidance on this overriding test is expanded in NPPG reference 37-007, which in the section headed ‘<i>How does Local Green Space designation relate to development?</i>’ says:</p> <p><i>‘<u>Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area.</u> In particular, plans must identify sufficient land in suitable locations to meet <u>identified development needs</u> and</i></p>

Name	Organisation	Comment ID	Comment Recieved
			<p><i>the Local Green Space designation should not be used in a way that <u>undermines</u> the aim of plan-making.'</i></p> <p>The background text says some development may be acceptable and provides recreation uses as an example. We have two comments on this. Firstly, to accord with NPPF 78, acceptable uses will be those set out in paragraph 89 for Green Belts. Secondly, whilst alternative use for recreation may be appropriate where the land is in public ownership, in most cases it is unlikely to be acceptable for land in private ownership.</p> <p><u>Specific Comments on Policy SA7 Wording</u></p> <p>Policy SA7 needs rewording. NPPG 37-005 says Local Green Space is a way to provide special protection against <u>development</u>. Therefore reference in the policy should be to 'development' not to 'planning permission'. We therefore suggest the following revisions to the policy:</p> <p><i>'Development that would harm the openness or special character of a Local Green Space or its significance in value to a local community will only be permitted where there are very special circumstances which outweigh the harm to the Local Green Space.'</i></p> <p>The tests for designating Local Green Space are partly quoted within the background document. However, the only evidence of an assessment of the NPPF criteria for every area either designated in Table 1 of the background paper or rejected in Table 2, is whether the land holds a particular significance. This involves identifying whether the land has any beauty, historic, recreation, tranquillity or wildlife significance. All the other criteria, if addressed at all, are considered in general terms in the justification column in both tables. This does not constitute a comprehensive NPPF/ NPPG compliant assessment for Local Green Space.</p> <p>There are a number of examples of areas designated as Local Green Space in parallel with other designations which we consider to be unnecessary. Firstly, the following areas are within the Bristol and Bath Green Belt;</p> <p>North of Vowles Close, Wraxall;</p> <p>Watchouse Hill, Pill;</p> <p>Conygar Hill, Portbury;</p>

Name	Organisation	Comment ID	Comment Received
			<p>Abbots Pool, Abbots Leigh;</p> <p>Land to the north east of Long Ashton (Ashton Court Estate);</p> <p>Peel Park, Long Ashton;</p> <p>Long Ashton Cricket Club;</p> <p>Wrington Hill, Wrington.</p> <p>The NPPG provides specific guidance on Green Belt and Local Green Space. Paragraph 37-011 under the heading ‘<i>What if land is already protected by Green Belt or has Metropolitan Open Land (in London)?</i>’ it says: ‘<i>if land is already protected by Green Belt policy or in London on Metropolitan Open Land, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.</i>’ We note that neither the background paper nor schedule 4 identify that these areas are in the Green Belt and as a result the additional assessment required by NPPG of whether or not any additional local benefit would be gained from Local Green Space designation has not been carried out. Comments on specific sites are as follows.</p> <p>Land north of Vowles Close, Wraxall and Land at Watchhouse Hill, Pill are both areas of North Somerset Council owned and managed open space where additional Local Green Space designation would serve no beneficial purpose. The Land North East of Long Ashton comprises Ashton Court Estate.</p> <p>In addition to Green Belt, the land enjoys a number of other designations including a Registered Park and Garden, SNCI, RIGS and SSSI. Local Green Space designation is unnecessary and provides no additional benefits. In addition the proposed designation amounts to 298.01 hectares and so substantially fails the NPPF ‘<i>extensive tract</i>’ test.</p> <p>Finally, Long Ashton Cricket Ground is a private sports ground. There is no assessment of why, as private land already protected by Green Belt designation, it is considered to be particularly worthy of designation and it fails to meet the Council’s own criteria that formal playing fields would not normally be appropriate for Local Green Space designation due to their restrictive access to the general public and because they are protected by other policies.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>Similarly and in addition, the following areas are covered by Policy SA9 Strategic Gap Designations:</p> <p>Jubilee Park, Weston-super-Mare;</p> <p>Land at the Tips, Broadway, Weston-super-Mare;</p> <p>Donkey Field, Uphill;</p> <p>Walford Avenue, Weston-super-Mare;</p> <p>West of Sedgemoor Close, Nailsea;</p> <p>The Perrings, Nailsea;</p> <p>Backwell Lake.</p> <p>We note that the background to Policy SA9 confirms that strategic gaps have similar functions and similar purposes to the Green Belt, but significantly they are operate on a much more localised focussed scale. Even more so there is then absolutely no need for overlapping Local Green Space designations, just as the background paper says that it is inappropriate for strategic gaps to overlap with the Green Belt.</p>
Portishead Town Council	Portishead Town Council	4193569//4	<p>PTC is content with the identified areas that include the Golf Course, Kilkenny Fields, Battery Point and the Lake Grounds plus many other green spaces which make Portishead the town it is.</p>
Cresten Boase		5118977//2	<p>Policy wording: Either the phrase 'except in very special circumstances' or the word 'adversely' (or both) should be omitted, if the policy is to be consistent with the rationale given at 4.38. Including the word 'adversely' weakens the statement unnecessarily. Landscape character should also be included as a characteristic inderpinning the designation.</p> <p>The policy refers to the Policies Map as a definitive record of LGS. This is incorrect, and conflicts with he NPPF, as it purports to rule out LGS designated by Neighbourhood Development Plans.</p> <p>Also, there is an inaccuracy on the face of the reassessment schedule: The proposed designation of the Award Lands and</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>War Memorial Recreation Ground and the adjacent Sidcot School playing fields in Winscombe, and the Award Lands in Sandford was rejected. They are referred to as ' formal playing fields.. and associated faciilities',together, and rejected as LGS, together. They are separate areas which require separate assessment.</p> <p>The WMRC IN Winscombe is demonstrably special to the local community, having been funded by public subscription to commemorate those who fell in war.; it has beauty as an open green space bounded by mature trees and looking directly out onto the Mendip Hills AONB, recreational value for informal recreation as well as organised sport. The WMRC is resubmitted for consideration as a LGS. It is accepted that Sidcot School playing fields and hockey enclosure may not fall within the definition of LGS.</p> <p>The Winscombe community orchard adjoining the Strawberry Line off Woodborough Road, planted and maintained by parishioners and local schoolchildren, special for the commemorative apple trees and as a place of recreation and tranquillity, with an outlook onto the AONB is submitted for consideration as a LGS.</p> <p>The Award Lands at Sandford are within the AONB but immediately adjacent to housing on Quarry Road,, demonstrably special, not extensive, a belt of green open spaces and paths interspersed with woodland to the South and East of the disused quarry, historically significant as awarded to parishioners in compensation for the disruption caused by the Sandford Quarry operations, of recreational value to walkers, of natural beauty, and rich in wildlife.</p>
North Somerset District Committee of CPRE	CPRE	931233//6	Policy SA7 Local Green Space - We are pleased to support this policy.

Section

Policy SA8: Undesignated Green Space

Name	Organisation	Comment ID	Comment Received
Wrington Parish Council	Wrington Parish Council	1019201//6	While the policy is supported we suggest that the wording limits its potential effectiveness in the use of ‘unacceptably affects’, which is arguably too subjective. Anything could be considered to be ‘acceptable’, it depends on how it is perceived by whoever makes the judgment. We recommend that the policy wording is amended to read ‘unacceptably damages’ or ‘unacceptably undermines’ or something even stronger.
Gladman Developments Ltd	Gladman Developments	11199745//5	<ol style="list-style-type: none"> 1. Gladman object to Policy SA8 on Undesignated Green Space as it is inconsistent with the Framework and should be deleted. 2. Gladman consider that any local open space, landscape or environmental designation must be predicated on a robust and comprehensive evidence base that clearly sets out the value of the space and the reasons for its protection. This evidence base can then be used in the planning balance exercise advocated by the Framework, allowing the Council to assess whether the adverse impacts of the loss of such areas significantly and demonstrably outweigh the benefits of delivering the full need for housing. 3. The Policy as it is written applies a simple blanket ban on development that is deemed to unacceptably affect the value of undesignated green space which is clearly contrary to the planning balance exercise and paragraphs 77 and 109 of the Framework. This Policy should therefore be deleted.
Persimmon Homes Severn Valley	-	3361153//16	The background text to Policy SA8 uses NPPF paragraph 77 as the policy justification for the identification in a policy of areas of undesignated open space. That is fundamentally wrong, because NPPF 77 deals with Local Green Space, ie areas of green space that meet the criteria set out in the paragraph which should be specifically designated. It is inappropriate to identify a two tier protection approach to areas of Local Green Space. If there area areas of land that satisfy the criteria in NPPF 77 then they should be

Name	Organisation	Comment ID	Comment Recieved
			<p>specifically identified as Local Green Space. However, given the extensive list of Local Green Spaces identified in schedule 4 we doubt that any additional areas would pass the NPPF tests.</p> <p>However, having set out the policy wording the plan does not actually identify any areas on the proposals map. Therefore, use of the term '<i>planning permission will not be granted for development</i>' in the policy demonstrates this is a policy which will be applied in response to planning applications for development in general terms, without any specific guidance on how it will be interpreted,. The effect is to apply a policy reason for refusal where none existed in advance. This retrospective approach to planning is contrary to the Planning and Compulsory Purchase Act 2004, specifically section 38 and to the NPPF. For example, paragraph 154 of the framework says '<i>only policies that provide a clear indication of a how a decision-maker should react to a development proposal should be included in the plan</i>'.</p>
Cresten Boase		5118977//3	<p>Undesignated green space needs to be more clearly defined or this policy will be of no or limited effect. Communities may recognise the amenity and other value of undesignated green space, but how this can be effectively put forward and supported in the context of a development applications is unclear, now it is proposed to drop the Amenity Area designation, and adopt a fairly restrictive definition of LGS.</p>
North Somerset District Committee of CPRE	CPRE	931233//7	<p>We would like the wording for the wording 'unacceptably affects' in this policy to be further defined. Green Space, whether designated or not can be highly valued by local communities and is often vulnerable to speculative development</p>

Section

Policy SA9: Strategic Gaps

Name	Organisation	Comment ID	Comment Recieved
Wrington Parish Council	Wrington Parish Council	1019201//7	We agree that Strategic Gaps have an essential role to play in ensuring that the impacts of future development on the character of North Somerset are minimized, as highlighted in para 2.8 under Policy Context. This policy is strongly supported
Churchill Parish Council	Churchill Parish Council	1190177//1	<p>We note from para 4.52 that strategic gaps are only identified in 5 locations. These do not include Banwell, Sandford, Churchill and Langford and along the A38. No explanation is given for their omission but these locations merit inclusion for the very same reasons that the other locations do. There is no logical or policy reason for not including them and marking the maps accordingly.</p> <p>In the briefing given to the North Somerset Council Executive 18th November 2016, there are specific communities identified and then reference to the Core Strategy document CS19 (Though Remitted is up for re-adoption) sub paras 3.242/243/244 defines and gives again a similar list of communities and states 'The list is not exhaustive', and goes on to give how the Policy will be delivered quote:</p> <p>3.244 Strategic gaps will be identified and a policy to guide assessment of development proposals affecting strategic gaps will be set out in the Sites and Policies Development Plan Document.</p> <p>We therefore assert that strategic gaps must be identified and included around Banwell, Sandford, Churchill, Langford and indeed for all Service Villages and Infill Villages and the maps amended accordingly. In the absence of such amendments the Plan will be found to be unsound.</p>
Oaktree Parks Ltd		14824225//1	While paragraph 4.52 and Policy SA9 of the SAP states that the detailed boundaries of Strategic Gaps are identified on the emerging Policies Map, we have failed to find any link to the

Name	Organisation	Comment ID	Comment Received
			<p>Map on the council's list of Consultation Documents. Accordingly, on behalf of Oaktree Parks Ltd, we attach objections to the detailed boundaries of the Strategic Gap between Weston-super-Mare and Locking in this response to Policy SA9.</p>
Viv Tomkinson	Congresbury Residents Association Group	15569185//6	<p>We strongly endorse the identification of strategic gaps to preserve the separate identity, character and/or landscape setting of settlements and would exhort NSC to rigorously apply this policy to protect the gaps between Congresbury and Yatton and between Nailsea and Backwell. Furthermore additional strategic gaps should be designated to protect service and infill villages such as Banwell and Sandford and Yatton and Kenn.</p>
frances		16061057//1	<p>Comment 1. The green belt should be redrawn to extend Bristol settlement boundary to Wild Country lane and A38. This would remove green belt designation from Long Ashton and Ashton Vale.</p> <p>This is necessary in order for the Site Allocations Plan to comply with NPPF. The Local Government Association's Planning and Advisory Service states that "there is a Duty to Cooperate in the Localism Act 2011 and the soundness tests in the NPPF are relevant to the consideration of the Green Belt." This is not currently the case.</p> <p>Comment 2. Proposed housing site at Morgan's Hill does not meet criteria in The Review of the Strategic Gaps Executive Summary October 2016.</p> <p>This states</p> <p><i>"3.0 Identifying the revised criteria to undertake the review of strategic gaps:</i></p> <p><i>Criteria to aid identification</i></p> <p><i>6.1 Relevant factors include proximity of settlements and views particularly from land which is accessible to the public including footpaths within or adjoining the gap."</i></p> <p>The review of Nailsea and Backwell Strategic Gap in relation to the criteria state:</p>

Name	Organisation	Comment ID	Comment Recieved
			<p><i>9.3 The sense of gap can be particularly perceived from places form which development at both settlements can be seen.Examples:</i></p> <p><i>public footpaths in/bordering the strategic gap for example :Morgan's Hill public footpath/bridleway, Nailsea;</i></p> <p><i>9.5 The extent of the gaps help convey the perceptionof the separate identity of the two settlements.....development at Nailsea has not yet spilt over that ridgeline onto the slope below.This is important to maintaining the perceived/visul and actual separation of the settlementsIt can be appreciated from Youngwood Lane and public footpaths extending north from it like those of Youngwood House Farm.</i></p> <p>The proposed site for housing at Morgan's Hill in Nailsea should be designated part of the Strategic Gap and not be developed. It is outside the settlement boundary and if built on this "would not contribute to "maintaining the perceived /visual and actualseparation of the settlements" .The housing is so close to the ridgeline that it would be seen from Youngwood Lane and prevent "the gap being appreciated from Youngwood Lane and public footpaths extending from it like Youngwood House Farm". as stated in the review para 9.3 and 9.5 It would impact on the adjoining footpaths on Morgan's Hill. The site is prominent with views and is accessible to the public as in the review criteria para 6.1 above.It links to Local Green Spaces and forms part of a network of historically important footpaths associated with Nailsea's industrial heritage of coal mining. They link with the most popular section of the Avon Cycleway and are an important amenity.</p>
Mendip Vale Medical Practice (MVMP)		16076321//2	<p>Policy SA9 provides a specific policy for development within strategic gaps including between Yatton and Congresbury. The site falls within this emerging Strategic Gap. We note that the consultation is accompanied by a ‘Strategic Gaps’ background document. Given our concerns that there are no sites allocated for healthcare provision around Yatton to accommodate the planned growth, we are concerned that there is no flexibility applied to this strategic gap to enable the provision of future health and community services.</p> <p>We therefore object to the extent of the emerging strategic gap, which would currently restrict development coming forward</p>

Name	Organisation	Comment ID	Comment Received
			<p>for a medical facility on the site referenced above. We request that the significant public benefits that would result from modern, state-of-the-art healthcare provision are taken into account in the consideration of this Strategic Gap.</p> <p>Recommended change: we request that further assessment of the Strategic Gap between Yatton and Congresbury is carried out to ensure that future healthcare needs within the plan period can be met. The allocation of land west of Smallway for healthcare use and its omission from the Strategic Gap would provide modern, efficient healthcare provision that is flexible in line with national NHS trends as well as deliverable to meet growing patient demands.</p>
Viv Tomkinson		16087009//1	<p>Strategic gaps must be defended. NSC needs to rigorously promote this policy to protect the separate identities of the service and infill villages. More strategic gaps need to be identified - for example between Sandford and Banwell.</p> <p>The proposal to develop a medical centre within the strategic gap between Yatton and Congresbury must be resisted.</p> <p>This location will breach the strategic gap and will achieve little in terms of patient access. Residents from Yatton and Congresbury will not be able to easily access the surgery if it is built in the strategic gap whilst the development will breach the wall between the two villages such that ribbon development will follow. This proposal must be resisted and the strategic gaps concept needs to be vigorously applied</p>
Thomas, T	David James & Partners	16098145//1	<p>LAND AT FROST HILL, YATTON</p> <p>Under Section 39(2) of the Planning and Compulsory Purchase Act (2004) all new plans and specified planning documents must be subject to the process of sustainability appraisal.</p> <p>In respect of the Site Allocations Plan: Publication Draft, while the lpa has prepared a Sustainability Appraisal dealing with residential and employment allocations, as well as Local Green Space, it does not appear to have carried out a sustainability</p>

Name	Organisation	Comment ID	Comment Received
			<p>appraisal of strategic gap boundaries, nor any consideration of alternatives.</p> <p>While it is accepted that, on 8 November 2016, the Inspector dealing with the Consequential Changes to the Core Strategy concluded (paragraph 45) that there was no need to revisit Policy CS19 to accommodate the housing requirement of the Plan (to 2026), he specifically noted that the job of setting the boundaries of strategic gaps was one for the Sites and Policies DPD.</p> <p>It is clear, therefore, that it is the job of the Site Allocations Plan to define the exact boundaries of the strategic gaps and that, in accordance with the legislation, the lpa should be testing how designated boundaries will contribute to sustainable development, and how these compare with alternative boundaries for the gaps.</p> <p>As a result of uncertainty over the district's strategic housing requirements (following a successful High Court challenge of Policy CS13 of the Core Strategy) progress on the Site Allocations Plan was delayed and only issued, as a further consultation draft, in March 2016. In this iteration of the Plan, while the draft policy contained no criteria for defining boundaries, the accompanying Background Document; Strategic Gaps (March 2016) included, at paragraph 6.1, broad criteria for defining strategic gaps. These were addressed in representations submitted on behalf of Mr Thomas in which we concluded that the land, and boundaries, did not meet the criteria set out in paragraph 6.1, or those set out in paragraph 85 of the NPPF.</p> <p>In its response to comments received on the 2016 Consultation Draft, in respect of strategic gaps, the lpa decided to review its approach to the definition of strategic gaps, including the criteria to be used when defining boundaries. The revised criteria, which is included in the Strategic Gaps Background Paper (October 2016), was published on 7 November 2016 as part of a suite of documents comprising the Site Allocations Plan: Publication Draft. To our knowledge, this document has not been subject to any prior public consultation, or sustainability appraisal, and, thus, remains the untested policy of the lpa.</p> <p>In fact, in an attempt to address criticism over its approach to defining strategic gaps, the lpa has adopted a report commissioned by the former Office of the Deputy Prime</p>

Name	Organisation	Comment ID	Comment Received
			<p>Minister, in 2001, entitled ‘Strategic Gap and Green Wedge Policies in Structure Plans: Main Report’ which, itself, referred to an earlier decision by an Inspector at the Inquiry into the Eastleigh Local Plan (1998) which considered a number of factors as being most useful in delineating strategic gaps. However, the criteria used, which pre-dates the NPPF, has not been robustly tested by the lpa as part of any sustainability appraisal and, at best, can only be regarded as out-of-date guidance on the matter.</p> <p>We submit that the lpa has not properly tested the proposed boundaries of the strategic gaps as part of the process of sustainability appraisal and that, accordingly, the policy is not legally compliant nor in accordance with the NPPF. Irrespective of the outcome of that process, we do not consider that the boundaries of the proposed Strategic Gap at Frost Hill have been robustly tested against possible alternatives, and fail to take account of proposal coming forward for the development of a medical centre on land between Yatton and Congresbury and development elsewhere between the two settlements.</p> <p>We reserve the right to submit further representations to the detailed boundaries of the Strategic Gap at Frost Hill as part of this consultation process.</p>
No Moor Development (Yatton)	No Moor Development	16100417//1	<p>We welcome the identification of strategic gaps (policy CS19) to preserve the separate identity, character and/or landscape setting of settlements and would encourage NSC to rigorously apply this policy to protect the gap between Yatton and Congresbury.</p> <p>It is self-evident that the medical practice serving Yatton and the surrounding catchment needs more capacity. Unfortunately, Mendip Vale Medical Practice conducted a charade of a public consultation by ranking 20 mostly spurious sites to arrive at their favoured location - on land off Smallway, within the Strategic Gap, which must be protected. Looking at the site selection criteria, this fact was not taken into account.</p> <p>The Strategic Gap is in place to prevent the coalescence of Yatton and Congresbury. YACWAG also consider it forms an important buffer zone to the Biddle Street SSSI. In a submission to NSC earlier in the year, David James & Partners claimed "it is inappropriate to designate land at Frost Hill as</p>

Name	Organisation	Comment ID	Comment Received
			<p>strategic gap...". The preferred location for the new medical centre is one of fields the land agent suggested in March should not be designated as Strategic Gap. Build a medical centre on this site and the integrity of the Strategic Gap will be compromised.</p> <p>NSC's own policy (previously CS19; now Policy SA9: Strategic gaps) provides clear and robust justification for this area's protection:</p> <p><i>"The width of the strategic gap between the nurseries and Yatton settlement limits is well under 300m wide. This emphasises the importance of protecting the proposed strategic gap. Also views across the gap seen from the B3133 in this narrow stretch, including the elevated backdrop to Yatton and the view south west across Congresbury Moor, are particularly attractive and show the importance of the strategic gap to the landscape setting of the settlements."</i></p> <p>During the 'consultation', many residents suggested the old Titan Ladders site on Mendip Road in Yatton as an alternative that should be considered for an expanded medical centre. Additionally, the land adjoining this site (to the rear) is allocated as 'strategic open space', while the adjacent field (another alternative) is still shown as 'land designated for a primary school' on the emerging policies map - but it is obvious to all parties that a school will never be built there - with another site for a school allocated at North End.</p> <p>The proposed site for a new Medical Centre would mean the loss of land designated as a green wedge and remove a sense of openness contrary to local plan policies.</p>
Yatton Parish Council	Yatton Parish Council	3106433//5	<p>Strategic Gap</p> <ul style="list-style-type: none"> • These are very important and define the area that is our village. We would therefore request that there is a strategic gap placed at the North End of the village to demonstrate a clear area for the service Village of Yatton. This is required to work in partnership with the gap between Yatton & Congresbury. It would seem odd to define the boundaries so clearly at one end of the village but leave the other end to potentially join with Kingston Seymour or Kenn. The

Name	Organisation	Comment ID	Comment Received
			final position of this Strategic gap would be defined in the emerging Neighbourhood Development Plan.
Persimmon Homes Severn Valley	-	3361153//17	It is not clear why the word 'only' has been inserted into the first sentence of the policy. This is unnecessary because development will either be permitted or it will not. 'Only' introduces a negative instruction to the policy which is contrary to the presumption in favour of sustainable developments.
St Modwen Properties PLC	-	3568545//5	<p>We retain our previous objections from April 2016 to the strategic gap between Weston-super-Mare and Locking and therefore do not wish to repeat the full case here.</p> <p>Recommended change: We request that further assessment of the Strategic Gap between Parklands Village and Locking is carried out to ensure that the housing requirement for Weston Villages can be met. We would reiterate that the allocation of additional land and extension of the Locking Parklands boundary would provide 500 units (including the 350 that the Council is already relying on the former Moss land but cannot be delivered in the constraints of the development boundary). Given the area of land available, this would still allow for a substantial area of open space to be provided which could have ecological and amenity benefits. This could also be sited so as to meet the underlying purpose of a strategic gap in this location, whilst still contributing to meeting the need for housing in the District</p>
Gleeson Strategic Land	Gleeson Strategic Land	4602593//1	<p>The Council has retro fitted a poorly presented background paper on the matter of a strategic gap which fails to explain or justify the need for such a designation in this location. The October 2016 'Strategic Gap Paper' adds nothing to the previous paper which was also fundamentally flawed.</p> <p>Our comments are focused in particular on the strategic gap to the south of Nailsea. Is there a need for a gap between the settlement of Backwell and Nailsea necessary and is it of strategic importance. It is suggested that this area does not need the protection afforded by such a designation as the land does not form a strategic function. Visually the settlements would remain separate without this designation and the</p>

Name	Organisation	Comment ID	Comment Received
			<p>importance of the separation is not justified in the context of the policy.</p> <p>The lack of evidence presented on this matter underlines the fact that the Council's proposal is unjustified, unneeded and one which is led by the desire to prevent development in this area and not, as Strategic Gaps should be, to prevent coalescence of settlements. The area of land designated for this proposed gap, even if developed, would not cause the coalescence of Nailsea and Backwell.</p> <p>The background paper presented by the Council fails to demonstrate a robust approach to the issue of a Strategic Gap. The analysis is poor, the commentary of the considered Nailsea/ Backwell Plan is fundamentally flawed, it contains disingenuous photographs to illustrate factors that clearly do not exist.</p> <p>Gleeson advocates that proposals that incorporate development within the Strategic Gap are considered on a site by site basis as development associated within a Strategic Gap location may be the most sustainable location for such development. In the case of Nailsea this restriction is being proposed on the most sustainable site in the Town. There are great access opportunities to public transport including the station without use of the car. It is the first location that the Council should be looking for development opportunities.</p> <p>Unlike the District or Town Council we have carried out an extensive study of this area which has been submitted to the Council before. The Strategic Gap between Nailsea and Backwell is without justification.</p> <p>The missed opportunities are further considered in the emerging spatial policy for the South West of England Joint Spatial Plan. In terms of Nailsea and Backwell it states:</p> <p>“Nailsea/Backwell is located on the outer edge of the Green Belt, physically close to Bristol and with strong economic links but it will require transport infrastructure investment such as MetroBus to significantly improve connectivity and maximise opportunities for sustainable travel. Nailsea is a town where there is an existing objective to improve the mix and balance of housing and support existing and new services, jobs and facilities. Any growth needs to be carefully integrated to ensure that the existing services and facilities would help support the new development and benefit from the</p>

Name	Organisation	Comment ID	Comment Received
			<p>opportunities generated. Development is anticipated to take place generally to the west of Nailsea and Backwell which will bring significant challenges in terms of transport delivery, but avoids the Green Belt and principal flood zone areas.”</p> <p>However, in acknowledging how this area can play an important role in delivering much needed housing for Nailsea into the future and protect the perception of a gap the ACD report that accompanies our representations offers an analysis and suggestion as to how the perception of a gap between the settlements can be preserved.</p> <p>The opportunities that exist for the land to the south of Nailsea in close proximity to the railway station and facilities south of Nailsea mean that it is an ideal location for development. Any proposed development would not result in the coalescence of Nailsea and Backwell as the existing constraints already safeguard a meaningful gap between Nailsea and Backwell i.e. Green Belt, The Backwell Pond SINC and floodplain.</p> <p>In response to the emerging Sites and Policy Plan we have undertaken more significant examination of the Strategic Gap issue. This is particularly needed given the lack of any detail provided by the Council who have failed to follow any recommended methodology in developing the principles of a Strategic Gap.</p> <p>We initially commissioned an analysis by Floyd Matcham and submit this document however given Gleeson’s long term commitment to this area we have also commissioned a report by ACD Ltd to analyse the need for a Strategic Gap and submit this as well.</p> <p>Definition of the Nailsea-Blackwell Strategic Gap</p> <p>The proposed strategic gap between Nailsea and Blackwell is described in Section 9.0 of the evidence paper. As noted previously, the proposed extent and boundaries of the strategic gap are substantially unchanged from those proposed in the 2013 Site Allocations Plan Consultation Draft. Consequently, if adopted, the strategic gap would take in a large area of land in the valley of the River Kenn where there is no risk of coalescence between neighbouring settlement boundaries.</p> <p>The evidence paper seeks to justify inclusion of land south of Nailsea by arguing that the strategic gap will help to prevent Nailsea from ‘spilling’ southwards over the well-defined</p>

Name	Organisation	Comment ID	Comment Received
			<p>ridgeline on the north side of the Kenn valley which marks the current limit of development at Nailsea. This part of the text confirms that prevention of encroachment into the countryside is seen by North Somerset Council to be a key objective of strategic gap policy. This approach is entirely contrary to the primary purpose of designating a strategic gap, namely to prevent coalescence, (or the perceived risk of coalescence) between settlements.</p> <p>Plainly, if it were to be permitted, a development on the southern edge of Nailsea would not pose a significant risk of coalescence with Blackwell because the majority of Nailsea's existing urban edge does not face towards the settlement boundary of Blackwell. Indeed, as noted in the conclusions to our 2013 appraisal, there is only a comparatively narrow corridor of land adjoining Station Road where, according to the criteria we have used, designation of a strategic gap might perhaps be justified.</p> <p>The Council has retro fitted a poorly presented background paper on the matter of a strategic gap which fails to explain or justify the need for such a designation in this location. The October 2016 'Strategic Gap Paper' adds nothing to the previous paper which was also fundamentally flawed.</p> <p>Our comments are focused in particular on the strategic gap to the south of Nailsea. Is there a need for a gap between the settlement of Backwell and Nailsea necessary and is it of strategic importance. It is suggested that this area does not need the protection afforded by such a designation as the land does not form a strategic function. Visually the settlements would remain separate without this designation and the importance of the separation is not justified in the context of the policy.</p> <p>The lack of evidence presented on this matter underlines the fact that the Council's proposal is unjustified, unneeded and one which is led by the desire to prevent development in this area and not, as Strategic Gaps should be, to prevent coalescence of settlements. The area of land designated for this proposed gap, even if developed, would not cause the coalescence of Nailsea and Backwell.</p> <p>The background paper presented by the Council fails to demonstrate a robust approach to the issue of a Strategic Gap. The analysis is poor, the commentary of the considered Nailsea/ Backwell Plan is fundamentally flawed, it contains</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>disingenuous photographs to illustrate factors that clearly do not exist.</p> <p>Gleeson advocates that proposals that incorporate development within the Strategic Gap are considered on a site by site basis as development associated within a Strategic Gap location may be the most sustainable location for such development. In the case of Nailsea this restriction is being proposed on the most sustainable site in the Town. There are great access opportunities to public transport including the station without use of the car. It is the first location that the Council should be looking for development opportunities.</p> <p>Unlike the District or Town Council we have carried out an extensive study of this area which has been submitted to the Council before. The Strategic Gap between Nailsea and Backwell is without justification.</p> <p>The missed opportunities are further considered in the emerging spatial policy for the South West of England Joint Spatial Plan. In terms of Nailsea and Backwell it states:</p> <p>“Nailsea/Backwell is located on the outer edge of the Green Belt, physically close to Bristol and with strong economic links but it will require transport infrastructure investment such as MetroBus to signnificantly improve connectivity and maximise opportunities for sustainable travel. Nailsea is a town where there is an existing objective to improve the mix and balance of housing and support existing and new services, jobs and facilities. Any growth needs to be carefully integrated to ensure that the existing services and facilities would help support the new development and benefit from the opportunities generated. Development is anticipated to take place generally to the west of Nailsea and Backwell which will bring significant challenges in terms of transport delivery, but avoids the Green Belt and principal flood zone areas.”</p> <p>However, in acknowledging how this area can play an important role in delivering much needed housing for Nailsea into the future and protect the perception of a gap the ACD report that accompanies our representations offers an analysis and suggestion as to how the perception of a gap between the settlements can be preserved.</p> <p>Summary</p>

Name	Organisation	Comment ID	Comment Received
			<p>North Somerset Council's evidence paper in support of Core Strategy Policy CS19 and policy SA9 in the Site Allocations Plan Consultation Draft seeks to justify the designation of strategic gaps within the District and sets out specific reasons to justify the designation of a substantial strategic gap between Nailsea and Blackwell.</p> <p>Our analysis of the evidence paper demonstrates that there are important concerns about the basis of the Council's justification for designating strategic gaps (particularly in the policy area of encroachment into the countryside) and continuing concerns about the criteria used for defining boundaries. In respect of the proposed Nailsea-Backwell Strategic Gap, there is no logical justification for designating a very extensive strategic gap where there is no actual or perceived risk of coalescence between the settlement boundaries at Nailsea and Backwell.</p>
Cresten Boase		5118977//4	<p>Policy SA9 does not go far enough to meet its stated aims, prevent the urbanisation of our countryside and prevent coalescence of communities. More defined strategic gaps between settlements across NS are strongly indicated.. Over the next few years, pending review of this Plan to align with the JSP, and due to the Authority's inability to show a 5 year housing supply, large developments outside settlement boundaries consented on appeal threaten the identity, character, and overall sustainability of settlements, for example the 118 dwelling development at Sandford, an infill village. Business development, ancillary buildings and intensification of use in gaps between settlements, are not guarded against.</p> <p>A strategic gap between Sandford and the surrounding service villages, including an area to the north of Sandford, is strongly indicated.. The countryside around Sandford is becoming substantially eroded despite its landscape definition, proximity to the AONB, and BMV agricultural land. There is a lack of publicly accessible green space in Sandford already, contrary to what is stated in the Sustainability Assessment. The JSP proposal for a garden village north of Sandford is for a discrete and separate settlement, which may not be achievable if further unplanned development occurs.</p>

Name	Organisation	Comment ID	Comment Recieved
North Somerset District Committee of CPRE	CPRE	931233//8	We support the policy for Strategic Gaps. They have an important role to protect the landscape setting, identity and character of settlements
Tom Leimdorfer		936033//3	While I am in full support of this policy with regard to any residential development, I think we need to be careful not to preclude proposals such as the proposed new Medical Centre which would be opposite what is already a commercial site with diverse small businesses. We also have the large Garden Centre (in effect Hypermarket) of Wyevale in the same area. Given the reality of strategic funding decisions taken by NHS England, it will become imperative to build a single modern and sustainable medical facility to serve Congresbury & Yatton. Hence the policy should be worded in such a way as to not exclude this possibility, while mitigating its potential impact on the area. Technically, it should be noted that the whole of the 'strategic gap' is within Congresbury, including dwellings on Woodhill.

Section

Policy SA10: Community use allocations

Name	Organisation	Comment ID	Comment Recieved
Mendip Vale Medical Practice (MVMP)		16076321//1	<p>These representations are prepared by GVA on behalf of Mendip Vale Medical Practice (MVMP), which currently includes healthcare facilities at Langford and St Georges, Yatton, Congresbury and Wrington. In summary, we have reviewed the proposed site allocations and evidence base relating to Strategic Gaps and are concerned that the current policies prohibit the Practice from providing appropriate healthcare facilities into the future.</p> <p>Health Context</p> <p>There is considerable growth planned in and around Yatton with some development already consented and new site allocations within the Site Allocations Plan. It is anticipated that this will increase the MVMP patient list to around 15,000 patients. In addition to development pressure, there is increasing pressure on Primary Care services to deliver additional community services in line with current national NHS trends, financial influences and local service reviews.</p> <p>As a result, there is a growing pressure being placed upon the existing practices and expansion and modernisation of the services is required. In line with the applications that have been approved for development at Yatton, MVMP has commenced with determining the strategy for future growth.</p> <p>MVMP has therefore been exploring how a modern facility could be bought forward to account for the increased patient demands. The existing facilities are considered inadequate to cope with these external factors, therefore, the preference is to provide efficiency and service benefits by developing a new bespoke medical facility that can accommodate the two existing surgeries at Yatton and Congresbury.</p> <p>We are, therefore, concerned that there are no allocated sites for new healthcare provision in the Yatton/Congresbury area to accommodate growth planned within the Site Allocations Plan. On this basis, we would like to take this opportunity to put forward land to the west of Smallway, opposite Cadbury Garden Centre, as a site for healthcare provision. A site location plan is attached to this representation for reference.</p> <p>The Site</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>The site measures approximately 0.7ha. The land is currently used for agricultural purposes and falls opposite the North Somerset Butterfly House and existing Cadbury Garden Centre complex. The site's surroundings include agricultural fields to the west and north of the site, Cadbury Garden Centre, business uses and a large amount of hard landscaped car parking to the south and east of the site beyond Smallway and residential properties located along the western side of Smallway. The site falls within Flood Zone 1 as shown on the Environment Agency Flood Map. Detailed technical and design work is underway to inform a full planning application, which is proposed to be submitted in Autumn 2017. Technical studies undertaken include:</p> <ul style="list-style-type: none"> - Preliminary Ecological Appraisal - Transport Assessment - Landscape and Visual Assessment - Site Investigation - BREEAM Assessment - Archaeology Study - Flood and Drainage Assessment <p>In summary, the site is relatively flat with a current boundary wall along Smallway. The majority of the wall would be retained as part of a proposal. Designated Green Belt land falls northeast of the site, beyond Wood Hill. Cadbury Hill, which includes a Scheduled Ancient Monument, a Site of Nature Conservation Interest (SNCI) and a blanket Tree Preservation Order (TPO) falls to the northeast of the site, beyond Smallway. A Public Right of Way (PRoW) runs to the south of the site, outside of the site boundary. Interim findings from the assessments have not revealed any technical reasons why development could not come forward on the site.</p> <p>Proposed Use</p> <p>The proposed development would provide a modern and efficient heath facility that will meet the needs of existing and future patients in the locality. The provision of an efficient and attractive primary healthcare facility is important to enable health practitioners to deliver the best service possible,</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>and to ensure buildings are responsive to patient expectations and technological advances.</p> <p>An ancillary pharmacy and mobile MRI would be accommodated within the proposals, which are intended to provide dispensing services and complementary consultation for patients attending both surgeries.</p>
NHS Property(Mark Adams)		16123777//2	<p>Policy SA10 - Community use allocations</p> <p>When planning for new settlements, the Council should ensure that they work with NHS commissioners and providers to ensure that adequate healthcare infrastructure is provided to support new residential development.</p> <p>Healthcare facilities are essential infrastructure and where new facilities are required, they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. The Council should therefore work with NHS commissioners and providers to consider the quantum and location of healthcare facilities that will be required to ensure that new settlements are sustainable</p> <p>Faced with financial pressures, the NHS requires flexibility in its estate. In particular, the capital receipts and revenue savings generated from the disposal of unneeded or unsuitable sites and properties for best value is an important component in helping to provide funding for new or improved services and facilities.</p> <p>Restrictive policies, especially those which require substantial periods of marketing, could prevent or delay required investment in services and facilities. It is important to note that there are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any property being declared surplus and put up for disposal</p> <p>An essential element of supporting the wider transformation of NHS services and the health estate is to ensure that surplus and vacant NHS sites are not strategically constrained by local planning policies, particularly for providing alternative uses (principally housing).</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>Much surplus NHS property is outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment. Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for housing (or other appropriate uses), and should not be subject to restrictive policies or periods of marketing.</p>
Portishead Town Council	Portishead Town Council	4193569//5	<p><i>PTC is disappointed that there have been no proposed sites for community facilities identified in Portishead although our schools are bursting at the seams. We believe that this needs to be reconsidered.</i></p>
Cresten Boase		5118977//5	<p>Sites that are identified for community use by Neighbourhood Development Plans should specifically be included in this Policy.</p>
Mrs B Pratt		8133025//2	<p>These representations relate to land at The Batch, wet of Mendip Road Yatton. This land is subject to proposed policy SA10 and identified in Schedule 5 thereunder Strategic Open Space.</p> <p>The land has been the subject of previous representations made in connection with the Site Allocations Plan March 2016 consultation, under comment ID:8133025//2. These sought to object to the proposed designation and require its removal.</p> <p>The respondent continues to object to the proposed allocation of the land for such use in the submitted version. The proposal continues to be made without any evidence of reasoned justification for its need other than simply being carried over from the previous North Somerset Replacement Local Plan. All the comments made in respect of previous representations refer to above are reiterated in connection with this consultation.</p> <p>Throughout all the consultations on the emerging Site Allocations Plan, there has been no contact with the land owner nor any evidence adduced for the need for such</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>strategic open space in Yatton. There appears to be no realistic chance that the proposal will be delivered within the plan period other than by compulsory purchase or in conjunction with wider housing development on the surrounding lands.</p> <p>Therefore the objections maintained and it is requested that the land is deleted from Schedule 5 and the Policies map.</p>
North Somerset District Committee of CPRE	CPRE	931233//9	We support the allocations for Community Use.

Section Policy SA12: A370 Corridor into Weston-super-Mare

Name	Organisation	Comment ID	Comment Recieved
Viv Tomkinson	Congresbury Residents Association Group	15569185//8	The principles included within SA12 are important and should be promoted, but we would ask whether there needs to be greater clarity in defining the A370 corridor. The detail on the proposals map is not easy to see/follow.
Persimmon Homes Severn Valley	-	3361153//18	<p>Following our comments at the consultation draft stage we support the deletion of '<i>other opportunities</i>'. However the clarity of the policy would benefit from further amendments.</p> <p>On the basis of the Council's clarification on page 110 of the Consultation Statement that it is not envisaged developments will contribute financially, but through high quality design and landscaping, we consider this should not be set out in the policy. The use of the word '<i>contribute</i>' in isolation, is open to misinterpretation and should be amended to '<i>contribute through high quality design and landscaping to the creation of a continuous, coordinated, high quality, visual approach into Weston-super-Mare.</i>'</p> <p>Secondly '<i>must contribute</i>' is a high test given that this relates to design and landscape, which is open to considerable interpretation. We consider '<i>should contribute</i>' is more appropriate.</p> <p>Again in respect of interpretation it is not clear how '<i>visible from</i>' will be interpreted and guidance should be provided on this.</p>
Cresten Boase		5118977//6	Improving the visual impact of Weston Centre is important for building image, attracting investment, and for pride in community and social wellbeing.. However, concentrating on the visual aspects of regeneration and improvement, without emphasising the priorities of reducing pollution and the effects of climate change, in an area which combines housing and employment, does not seem appropriate or helpful, particularly if the hoped-for economic regeneration is delayed.

Name	Organisation	Comment ID	Comment Recieved
Highways Agency (S Walsh)		8141345//4	Policy SA12 relating to the A370 Corridor into Weston super Mare is of particular significance to Highways England as it connects directly with the SRN at M5 Junction 21. It mainly relates to the visual improvement of the corridor. Highways England would reiterate that any proposals along the route would need to be supported by the appropriate evidence base which would consider its impact on the SRN as appropriate.
North Somerset District Committee of CPRE	CPRE	931233//10	We strongly support this policy which will greatly enhance the approach into Weston and could make a positive contribution to the entrance to a number of North Somerset towns who have seen unsympathetic and unsightly development over the years.

Section

Winterstoke Village*

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//3	<p>Winterstoke Village (former Weston Airfield)</p> <ul style="list-style-type: none"> · In the Board's district · Heavily reliant on the rhyne network · Accounted for within the Weston Villages Strategic Flood Solutions · Local rhyne network identified to require further assessment and possible enhancement <p>Engaging at detailed planning application stage</p> <p>Maintenance and access requirements may impact on achievable housing numbers</p>
Persimmon Homes Severn Valley	-	3361153//5	<p>We note that the total allocation at Weston-super-Mare is now 12,753, which equates to a delivery rate of 638 dwellings per annum over the plan period. This compares with a completion rate of only 348 in Weston-super-Mare during the period 2006-2015. Whilst clearly Weston Villages only contributed figures in the latter part of that period and its delivery will rise as other parts of the development area begin and the number of outlets expand, the increase from a delivery rate of 348 to a required rate over the remaining 10 years of the plan to 974 (an increase of 179%) is substantial. Whilst increased availability of sites with planning permission and number of outlets will lead to an increase in numbers the market for housing in the area will also have an impact and we note that the Council's 5 year housing land supply trajectory for Haywood Village 1 and 2 is less than 140 dwellings per annum (in line with our own expectations) at a time where there is only limited competition from other outlets in Weston-Super-Mare.</p> <p>Persimmon Homes Severn Valley are increasing the number of outlets at Haywood Village in order to contribute to an increase in the delivery rate at Weston Villages. However market conditions can change. Therefore we conclude in relation to this issue that the reliance on a flexibility allowance about 1% is unrealistic on the basis that this then requires one submarket area to deliver 9,291 dwellings out of a total requirement of 13,056</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>over the remainder of the plan period, or over 71% of the requirement.</p> <p>Winterstoke Village</p> <p>Persimmon Homes Severn Valley are concerned at the length of time that it is taking to resolve viability issues on the phase 2 application which may cause delivery problems on the airfield.</p> <p>Of equal concern is the time being taken to determine Reserve Matter applications on Phase 1. For example, it took 6 months from submission to approval of the application for the Local Centre and Parcel 10B and nearly 6 months for parcel H2. These delays impact on the ability to provide continuity of delivery of housing and supporting facilities, and will impact on delivery if repeated elsewhere.</p>

Section

Parklands Village*

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//4	<p>Parklands Village (former RAF Locking site)</p> <ul style="list-style-type: none"> · In the Board’s district · Heavily reliant on the rhyne network · Accounted for within the Weston Villages Strategic Flood Solutions · Local rhyne network identified to require further assessment and possible enhancement <p>Engaging at detailed planning application stage</p> <p>Maintenance and access requirements may impact on achievable housing numbers</p>

Section**Westacres Caravan Park**

Name	Organisation	Comment ID	Comment Recieved		
North Somerset Internal Drainage Board (Simon Bunn)		16130337//5	<table border="1"><tr><td data-bbox="660 454 963 745">In the Board's district A difficult site to develop due existing flood risk issues.</td><td data-bbox="963 454 1458 745">A higher level of surface water attenuation will be required that could impact on plot capacity. This should be noted in the 'Site specific details/notes' column.</td></tr></table>	In the Board's district A difficult site to develop due existing flood risk issues.	A higher level of surface water attenuation will be required that could impact on plot capacity. This should be noted in the 'Site specific details/notes' column.
In the Board's district A difficult site to develop due existing flood risk issues.	A higher level of surface water attenuation will be required that could impact on plot capacity. This should be noted in the 'Site specific details/notes' column.				
Osmond Family		4601377//1	The allocation includes an area of land to the south of Westacres Caravan Park which has already been developed. The Schedule should make clear that the allocation, for up to 130 dwellings, excludes that area.		

Section**Orchard House, Ebdon Road**

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//6	A higher level of surface water attenuation will be required that could impact on plot capacity. This should be noted in the 'Site specific details/notes'

Section**Land to the rear of Locking Road**

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//7	A higher level of surface water attenuation will be required that could impact on plot capacity. This should be noted in the 'Site specific details/notes' column.

Section

Walliscote Place

Name	Organisation	Comment ID	Comment Recieved
D. E		15972289//1	<p>1) WsM -The former police station / magistrates court site should be developed for 100 % affordable 'help to buy 'housing . This has been identified as the priority category of housing by the joint council's spatial plan. Private development has failed to deliver sufficient housing which young working people can actually afford to buy. This site is owned by North Somerset Council and could be sold to the Homes and Communities Agency ,as with Locking Road car park ,to ensure the provision of affordable 'help to buy' homes .</p> <p>Of all the sites put forward in this SAP plan only this former police station site and the Locking road car park sitse could be built with the aim of maximising the affordable housing supply for local people. A non profit , meeting costs only principle would have to apply and whereas private builders would not build on this principle the Council and the Homes and communities agencies could adopt this principle as they exist to serve the needs of the local community.</p> <p>2) WsM- The inclusion of Roselawn and Central chambers is inappropriate to a section of the plan concerning housing since it is proposed for commercial development not housing . This part of the Walliscote place site should be deleted from this section of consultations and the council as owners of this site should be transparent regarding their intentions.</p> <p>3) WsM- Objection in any event to commercial development of Roselawn and Central chambers . This would involve demolition of the existing Victorian buildings on a site which visually forms part of the character of this area of WsM alongside the old town hall . These Victorian buildings together present a iconic frontage and should be preserved as part of the historic town centre It is a highly visible site from the approach to the town centre from the railway station . There is a cluster of historic buildings here - the Old Town Hall (listed) , the Art Deco buildings opposite the old town hall , the Former Magistrates court (listed) , Walliscote school (listed) and the victorian terrace opposite the new town hall.</p> <p>This SAP document states that it wishes to preserve the historic environment and the settings of listed buildings - the proposals for these buildings are contrary to those policy objectives and should not be permitted.</p> <p>4) The small area of land on the corner of Walliscote road (adjacent the listed Walliscote school and opposite the listed magistrates court)</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>is inappropriate to be developed for Housing. The area is not needed for housing and does not form any natural or contiguous part of the Police station site . The land is owned by the council and could be better used to comply with their green spaces/ green corridors policies expressed in this sap plan by the provision of a small ' pocket ' park / tree planting area for the amenity of the town centre visitors and the people who will be living in the new homes on the former police station site and on Dolphin square . At the moment there are no local green spaces between the railway station , the Town Hall and the Dolphin square development.</p>

Section**Dolphin Square***

Name	Organisation	Comment ID	Comment Recieved
D. E		15972289//2	<p>Dophin Square was originally supposed to have been developed as a retail / entertainment centre for WsM . I have since seen comments in the local paper that Dolphin Square may be developed as some entertainment facilities and student flats . This could be good for the town but only if the type of housing provided is either student accommodation for Weston College's new campus at the Winter gardens and / or affordable 'help to buy' housing to give younger generations their first step on the housing ladder.</p> <p>However, is the council intending to designate Dolphin Square for student and/ or affordable accommodation ?</p>

Section

Land to the west of Winterstoke Road

Name	Organisation	Comment ID	Comment Received
D. E		15972289//3	<p>1) Objection to this allocation on the grounds that there should be no further housing development in WsM (apart from sites which already have consent and council owned sites proposed for 100% affordable help to buy / shared ownership housing for the benefit of local people.)</p> <p>I feel strongly that all additional sites to meet housing numbers should now be allocated to the north of the district closer to Bristol. This could be easily achieved by means of a new settlement on the land 'opened up' by the South Bristol Link road . Development here could provide 100% affordable shared ownership housing adjacent to the main area of employment for this region namely Bristol .</p> <p>2) Objection to this allocation on the grounds of loss of Public Open Space , recreation ground and local amenity area</p>
North Somerset Internal Drainage Board (Simon Bunn)		16130337//8	<p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>
Persimmon Homes Severn Valley	-	3361153//6	<p>We note that the site specific details specify that the '<i>loss of sports pitch needs to be addressed.</i>' A key factor is the need to consider the particular circumstances of the site. The '<i>sports field</i>' consisted of a single football pitch in a larger area of partly mowed grassland. It had no changing facilities, equipment storage or car parking and was entirely reliant on the adjoining Woodspring Stadium for all these facilities. It therefore could not on its own be used as a formal playing field for organised league fixtures. Teams associated with Weston-super-Mare FC based at the Woodspring Stadium next to the site have used the grass area and the football club are currently in the process of submitting a proposal for a new 3G facility at the Woodspring Stadium which would replace any use they currently make of the field which is subject to the proposed applications. Persimmon Homes Severn Valley are assisting the football club in this initiative by cooperating in a boundary reconciliation between</p>

Name	Organisation	Comment ID	Comment Recieved
			the two sites to enable the new 3G facility to be provided at the Woodspring Stadium.

Section Land to the north of the A370, Summer Lane

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//9	<p>This is currently being constructed and yet the plan indicates there is no current consent?</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>

Section**Bridge Farm, Bristol Road**

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//10	<p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>
Curry Trust		4601345//1	<p>These representations relate to land at Bridge Farm, Bristol Road, Worle, WSM which is proposed to be allocated under policy SA1 and Schedule 1 thereunder.</p> <p>The land has been the subject of previous representations made in connection with the Site Allocations Plan March 2016 consultation, under comment ID: 4601345//1.</p> <p>The land continues to be proposed for allocation for housing and mixed development. The respondents, who own the land, continue to welcome and support this proposal. The site has already been the subject of pre-application advice from the Council and a scheme will be prepared and brought forward in the form of an appropriately considered application in due course.</p>

Section

Birnbeck Pier

Name	Organisation	Comment ID	Comment Received
Historic England (R Torkildsen)	Historic England	12476353//1	<p>To accord with national policy, the Plan needs to demonstrate that great weight has been afforded to the conservation of affected heritage assets including their setting where this contributes to the asset's significance. At present the evidence relating to this elevated and exposed site is unavailable/not apparent and as such the implications of development on the character and appearance of the Conservation Area and the setting of adjacent heritage assets is unclear (key national policy reference NPPF para 158). This evidence needs to be provided and ideally you should indicate how development relates to, and ideally supports, the Pier's future restoration (a significant heritage asset on the national heritage at risk register (key national policy reference NPPF para 126).</p> <p>At present the Plan indicates a large area of the promontory for an allocation. It is unclear where 50 new homes could/would be located.</p> <p>The relevant heritage considerations include, that:-</p> <ol style="list-style-type: none"> 1. Great weight should be given to the conservation of heritage assets (NPPF Para 132); 2. Special regard must be given to desirability of preserving the setting of a listed building; and special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas in the exercise S66 and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990). 3. Development will be expected to avoid or minimise conflict between any heritage asset's conservation and any aspect of the proposal (NPPF Para 129); 4. Harm should always be avoided in the first instance. Only where this is not possible should mitigation be considered (NPPF Para 152). Any harm and mitigation proposals need to be fully justified and evidenced to ensure they will be successful in reducing harm. 5. Strategic allocations are expected to be consistent with the Local Plan's positive strategy for the conservation and enjoyment of the historic environment; conserving heritage assets in a manner appropriate to their significance (NPPF paragraph 126).

Name	Organisation	Comment ID	Comment Recieved
			<p>As decisions are expected to be made in accordance with the development plan there needs to be a degree of certainty that the allocation is both suitable and deliverable. At present there is no apparent evidence to demonstrate whether this is the case. As a consequence the local authority has not demonstrated that the Plan is consistent with the national objective of achieving sustainable development nor can be delivered in accordance with policies in the NPPF.</p>

Section

Gas Works, Winterstoke Road

Name	Organisation	Comment ID	Comment Recieved
D. E		15972289//4	<p>Objection to this allocation on the grounds that there should be no further housing development in WsM or Weston Villages</p> <p>(apart from sites which already have consent and council owned sites proposed for 100% affordable help to buy / shared ownership housing for the benefit of local people.)</p> <p>The joint council's spatial plan policy states sustainability is the top criteria for new housing sites . In order for North Somerset to comply with those sustainability policy objectives all additional sites to meet housing numbers should be allocated to the north of the district ie closer to Bristol. This could be easily achieved by means of a new settlement on the land 'opened up' by the South Bristol Link road . New housing sites in that area could provide 100% affordable shared ownership housing adjacent to the main area of employment for this region namely Bristol . Housing in the north of the district would , therefore, meet sustainability objectives in respect of reducing congestion on roads , availability of quick and affordable public transport , ability to travel to employment / quality of life etc.</p> <p>Additional housing allocation sites around WsM would fail to meet any of these sustainability criteria . Large numbers of WsM's working population have to commute the entire length of the district to employment in Bristol. Rail & bus transport over this distance is unaffordable , adds hours to people's working day and is overall difficult .</p>
North Somerset Internal Drainage Board (Simon Bunn)		16130337//11	<p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>

Section**Nightingale Close, Mead Vale**

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//12	<p>Extremely difficult site to drain, with numerous current issues. The Board would expect a reduction in surface water run-off to contribute to alleviating current issues.</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity. A reduction in runoff is required.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>

Section

South of Herluin Way, Avoncrest Site*

Name	Organisation	Comment ID	Comment Received
D. E		15972289//5	<p>Objection to this allocation on the grounds that there should be no further housing development in WsM or Weston Villages</p> <p>(apart from sites which already have consent and council owned sites proposed for 100% affordable help to buy / shared ownership housing for the benefit of local people.)</p> <p>The joint council's spatial plan policy states sustainability is the top criteria for new housing sites . In order for North Somerset to comply with those sustainability policy objectives all additional sites to meet housing numbers should be allocated to the north of the district ie closer to Bristol. This could be easily achieved by means of a new settlement on the land 'opened up' by the South Bristol Link road . New housing sites in that area could provide 100% affordable shared ownership housing adjacent to the main area of employment for this region namely Bristol . Housing in the north of the district would , therefore, meet sustainability objectives in respect of reducing congestion on roads , availability of quick and affordable public transport , ability to travel to employment / quality of life etc.</p> <p>Additional housing allocation sites around WsM would fail to meet any of these sustainability criteria . Large numbers of WsM's working population have to commute the entire length of the district to employment in Bristol. Rail & bus transport over this distance is unaffordable , adds hours to people's working day and is overall difficult.</p>
North Somerset Internal Drainage Board (Simon Bunn)		16130337//13	<p>Extremely difficult site to drain, with numerous current issues. The Board would expect a reduction in surface water run-off to contribute to alleviating current issues</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity. A reduction in runoff is required.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>

Section Former Bournville School Site, Sellworthy Road

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//14	<p>Extremely difficult site to drain, with numerous current issues. The Board would expect a reduction in surface water run-off to contribute to alleviating current issues</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity. A reduction in runoff is required.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>

Section**Former Sweat FA Site, Winterstoke Road**

Name	Organisation	Comment ID	Comment Recieved
D. E		15972289//6	<p>Objection on the grounds that this site should be safeguarded for employment use.</p> <p>Objection on the grounds that the Planning Inspectorate rejected an application for housing development on adjacent land on the grounds of safeguarding local employment land (Appeal ref APP/DO121/ W/ 15/ 3004616 Land off Woodview terrace)</p> <p>Objection on the grounds that development of this site using access to/ from Bridge road is wholly inappropriate and unsafe . The sight lines and visibility along Bridge road as it stands are very poor , any further development using Bridge road as access would compromise safety to an unacceptable degree.</p> <p>This allocation should be deleted.</p>
North Somerset Internal Drainage Board (Simon Bunn)		16130337//15	<p>Extremely difficult site to drain, with numerous current issues. The Board would expect a reduction in surface water run-off to contribute to alleviating current issues</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity. A reduction in runoff is required.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>

Section

Station Gateway*

Name	Organisation	Comment ID	Comment Recieved
D. E		15972289//7	<p>Objection to this allocation as this does not meet the sustainability objectives set out in the joint council's spatial plan..</p> <p>The Bus & coach park will be displaced by the development of Locking Road car park . There needs to a sustainable and integrated public transport system and this should include provision on this site for the bus and coach park . The site should also incorporate provision for road and rail based park and ride.</p> <p>This as yet undeveloped land around the existing Railway station provides the only opportunity that is ever likely to exist for the provision of an integrated and sustainable public transport system for the district. The proposals outlined fail to deliver what is needed.</p>
North Somerset Internal Drainage Board (Simon Bunn)		16130337//16	<p>Extremely difficult site to drain, with numerous current issues. The Board would expect a reduction in surface water run-off to contribute to alleviating current issues</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity. A reduction in runoff is required.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>

Section

Land at Bridgewater Road*

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//17	<p>Extremely difficult site to drain, with numerous current issues. The Board would expect a reduction in surface water run-off to contribute to alleviating current issues</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity. A reduction in runoff is required.</p> <p>This should be noted in the ‘Site specific details/notes’ column.</p>
C Robbins		8492001//1	<p>I am of the opinion that the proposed access onto Bleadon Hill is not viable. Under this access proposal the vast majority of the vehicle traffic from the 70 new properties would naturally enter Bridgewater Road at its junction with Bleadon Hill and would therefore be joining the existing vehicle traffic coming down from the Bleadon Hill residential area onto the Bridgewater Road. The junction is already known to be a dangerous junction as it is a cross-roads with the busy A370 and effectively a blind junction for all vehicles coming out of Weston-Super-Mare. The vehicles from Weston-Super-Mare often accelerate hard around the corner and up the hill to the junction with Bleadon Hill. Sometimes cars coming from the south are in the middle of the road waiting to turn onto Bleadon Hill. All-in-all with the increase in cars using the junction in all directions the potential for a serious accident to occur will increase dramatically. I would therefore like to propose a filter lane into and out of the new development site to the west, joining the Bridgewater Road approximately halfway between the Hospital Roundabout and the Bleadon Hill junction. I would also like to propose a widening of the junction and traffic lights installed at the Bleadon Hill junction with the Bridgewater Road to significantly reduce the opportunity for an accident to occur.</p>

Section

Total for Weston-super-Mare

Name	Organisation	Comment ID	Comment Recieved
Environment Agency	Environment Agency	1020673//2	<p>Weston Super Mare area</p> <p>The Environment Agency are potentially seeking financial contributions for managing the flood risk on the Uphill, Cross Rhyne and Banwell catchments. Developments in the Weston Super Mare areas will potentially increase runoff into the Uphill, Cross Rhyne and Banwell catchments putting additional pressure on this length of watercourse</p>
Weston Town Council	Weston-super-Mare Town Council	7777185//1	<p>Weston-super-Mare Town Council would comment as follows.</p> <p>The priority for the town as a whole is that transport and social infrastructure needs, including health and education requirements, need to be prioritised in front of housing development in terms if timelines.</p> <p>Weston-super-Mare is already taking the largest share of the new housing development for the district which could be eased by the larger villages accepting more housing development. Secondly the green belt boundary at south Bristol needs reviewing to allow housing development between the current urban boundary and the new A370 to A 38 link road.</p> <p>In terms of new build sites in Weston the Town Council would like to see both high quality development and adequate levels of parking provision.</p>
Highways Agency (S Walsh)		8141345//5	<p><u>Weston-Super-Mare Development</u></p> <p>Schedule 1, 2 and 3 of the Plan show that by 2026 about 8,640 dwellings, 70.5 hectares of B class employment sites and 57 hectares for safeguarded employment sites will be made available.</p> <p>Schedule 1 of the Plan identifies large residential sites. There are a couple of very large sites with planning consent such as Parklands Village with a remaining capacity of 3,700 dwellings, and Winterstoke Village with 2,233 capacity remaining as of</p>

Name	Organisation	Comment ID	Comment Recieved
			<p data-bbox="691 331 1463 645">April 2016. A number of smaller sites also have planning consent. The remaining sites that don't have planning permission will need further consideration in relation to the transport evidence base supporting these sites, which will need to be sufficiently robust and include consideration of potential mitigation proposals to ensure that both the individual and cumulative impacts of the developments in Weston-Super-Mare will not have any detrimental impact on the operation or safety of the SRN.</p> <p data-bbox="691 678 1445 925">As the overall scale of development in this area is significant, it is anticipated that it will inevitably have implications for the SRN and in particular Junction 21 of the M5. We therefore expect that the appropriate evidence will be presented that considers the influences at the SRN and the requirements for future improvement of the junction as recognised by Core Strategy Policy CS10 Transportation and Movement.</p>

Section**North of Churchill Avenue**

Name	Organisation	Comment ID	Comment Recieved
Environment Agency	Environment Agency	1020673//12	<p>Clevedon - Land north of Churchill Avenue:</p> <p>Any development on this site should consider enhancement of the river corridor for both wildlife and recreation. The National Planning Policy Framework states that existing open space such as this site should not be built upon.</p>
Tracey Poole		16100353//1	<p>I object to the North of Churchill Avenue Site being included - this is a public recreational space. With Clevedon being in Flood Zone 3a, and the site being next to the river, this site should not be included.</p>

Section**Millcross site**

Name	Organisation	Comment ID	Comment Recieved
NHS Property(Mark Adams)		16123777//1	<p><u>Schedule 1 Site Allocation – Millcross Site</u></p> <p>NHSPS supports the allocation of the ‘Millcross Site’ as a large site for residential development within Schedule 1 to Policy SA 1, should it be declared as surplus to the operational healthcare requirements of the NHS by commissioners</p>

Section

Total for Clevedon

Name	Organisation	Comment ID	Comment Recieved
Environment Agency	Environment Agency	1020673//3	<p>Clevedon</p> <p>We are potentially seeking financial contributions for managing the flood risk in the Blind Yeo catchment and around Marine Lake, Salthouse Bay, Littleharp Bay and Clevedon Bay areas. Developments in the Clevedon and Nailsea areas will potentially increase runoff into the Land Yeo/Blind Yeo catchments putting additional pressure on this length of watercourse.</p>
Highways Agency (S Walsh)		8141345//6	<p><u>Clevedon</u></p> <p>A smaller scale of development is proposed in Clevedon in comparison to Weston-Super-Mare with an overall capacity of 221 dwellings, 10.3 hectares of B class employment land and 33.4 hectares of safeguarded employment land.</p> <p>Schedule 1 of the Plan identifies that of the eight sites within Clevedon, four sites have planning consent with a remaining capacity of 82 dwellings. The remaining sites, including the Millcross site and north of Churchill Avenue site, have a capacity of 70 and 44 dwellings respectively and are located close to Junction 20 of M5. A suitable evidence base will need to be presented to consider the influences at the SRN and the need for any supporting measures/mitigation for the remaining sites.</p>
Clevedon Town Council (I Johnson)	Clevedon Town Council	8141825//1	<p>The Council is concerned that some of the existing commercial/employment sites in Clevedon are coming to the end of their marketable life. Members are of the opinion that these brownfield sites, which are adjacent to residential areas, should be considered for residential development in lieu of other sites in the town which are currently included under Schedule 1 of the Site Allocations Plan October 2016.</p>

Section

Trendlewood Way

Name	Organisation	Comment ID	Comment Recieved
Reis Braganza	Nailsea Action Group	14666145//1	<p>I am commenting on this application in a personal capacity, but also as a member of the Trendlewood Way Action Group.</p> <p>Whilst we do not object to the development of Trendlewood Way Fields by the current owners, Brunelcare and St Peters Hospice, we require that the fields are developed in keeping with the local neighbourhood. We do not want the issue of maximum asset realization by the Charities and maximum profitability by the allocated developer to override considerations such as the retention of the character and uniqueness of this particular part of Nailsea.</p> <p>NPPF (National Planning Policy Framework dictated for housing developments by Central Government) is the policy which all local government authorities are obliged to work under, and the following comments are made in the light of this framework.</p> <p>We are concerned about North Somerset Council’s allocation of up to 30 dwellings for this site. This would represent a density of 26.4 houses per hectare if no open space were left. This density would be above the average for new housing developments. Whatever combination (detached, Semi-detached, terraced etc) of dwelling is considered, this density is far above that of the surrounding area. NPPF clearly states in Planning Practice Guidance paragraph 58, which requires that developments “will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development ” and paragraph 59, which requires planning policy to guide “scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally”. The local area, ie the surrounding streets of Avening Close, Bucklands Drive and Bucklands Batch, has a much lower density then that proposed by NSC.</p> <p>NPPF paragraph 60 states ‘It is, however, proper to seek to promote or reinforce local distinctiveness’. This level of density will patently not be appropriate to the character of this area.</p> <p>NPPF paragraph 64 states ‘Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions’ Whilst at this stage, no outline plans are</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>available, NSC should take these factors into consideration prior to submitting this to the Independent Inspector and the Secretary of State.</p> <p>The site specific details and notes for site indicate that it falls within The Coal Authority Development High Risk Area and a Coal Mining Risk Assessment will be required</p>
Terry Bevan		14818497//1	<p>A shop is not needed on this site and in our opinion would not have enough footfall to create a viable business. There are a lot of shops in level walking distance of this area including the garage shop just down the hill. A shop would create traffic problems on Trendlewood Way which is often obstructed by overspill parking from the station. It is a major bus route and buses often have difficulty negotiating around parked cars. There are even more cars parked along it during the warmer months when the local croquet club is in action. The lady who donated this land to St Peters Hospice and Bristol Old Peoples Welfare Society (which became Brunelcare) wanted some provision for older people on the land. The area facing Trendlewood Way should have bungalows built on it to complement the ones opposite and to keep Trendlewood Way a pleasant, open, light and green area.</p>
Nailsea Action Group	Nailsea Action Group	14823809//5	<p><u>COMMUNITY ENGAGEMENT</u></p> <ul style="list-style-type: none"> • The level of community engagement for was not sufficient for a high impact consultation of this nature. The general public was largely unaware of the consultation process, both in the spring and this autumn consultation for SAP2. (As reference, when National Grid were planning Pylons through the adjacent countryside, every household was sent a newsletter) • The public engagement event in Nailsea library, in the spring, was not publicised effectively and the layout of the venue did not allow easy viewing of the plans. • The North Somerset Council website was confusing. It is very difficult to locate the appropriate part of the consultation to comment on Trendlewood Way and other locations in Nailsea • This Autumn/winter consultation (SAP2) was even more confusing for the public. It co-incided with the Joint Spatial Plan (JSP for short, 2,600 more houses planned for Nailsea) and the Joint Transport Strategy

Name	Organisation	Comment ID	Comment Received
			<p>(JTS for short, Major road from M5 planned through Nailsea amongst other very costly and unfunded projects)</p> <p><u>Quality of Evidence</u></p> <ul style="list-style-type: none"> • Trendlewood Way Fields was identified for a high density development, for this area, without having assessed infrastructure, traffic and environmental impacts. • The subsequent release of the JSP /JTS initiatives has indicated major impact on Nailsea. Trendlewood Way is one of the major roads leading to the railway station and to the Backwell intersection, the main routes into Bristol and Weston-super-Mare. • Contradictions between evidence used for the Site Allocations Plan and the West of England Joint Spatial Plan (JSP): Towards the Emerging Spatial Strategy suggest that the quality of evidence used was not thought through. For instance, the selection of Nailsea and Backwell for the building of 3,600 dwellings between 2026 – 2036, will increase traffic hugely and gridlock the whole of this area. The proposed transport infrastructure is very unrealistic (in the light of other West of England projects like GWR electrification, Portishead – Bristol railway etc) and completely unfunded at this stage. <p><u>Infrastructure Requirements</u></p> <ul style="list-style-type: none"> • Sites were selected without having assessed infrastructure impacts, particularly the local road network. Trendlewood way is crossed by school children in the morning rush hour, and by bus users throughout the day. • Trendlewood Way itself is now utilised by many as overflow for the railway station. Informal monitoring of car-park spaces at the Railway Station indicate that it is 85% full during workdays, and with 1000 new dwellings proposed for Nailsea under the Site Allocation Policy, this situation will only worsen. • Many commuters are parking in the Trendlewood area to avoid paying charges for the Station Car-park. In the summer, many Croquet Club users are also forced to park on Trendlewood Way. On occasion, some parts of Trendlewood way becomes a single track road when buses and other heavy vehicles are using the route.

Name	Organisation	Comment ID	Comment Recieved
			<p data-bbox="689 331 1453 365"><u>Sustainable Developments : General Issues and Housing Mix</u></p> <ul data-bbox="767 398 1453 1373" style="list-style-type: none"> <li data-bbox="767 398 1453 958">• Density of Development: Any village, town or city will have a varied fabric or context within which each part of settlement, building, road and feature will be located. Without this consideration a significantly enlarged Nailsea would become an amorphous unvarying settlement of reduced character, departing from the mixed areas of the town. It would be appropriate to allow a residential development in the Trendlewood Way Fields that was consistent in terms of dwelling type but also in terms of density with the dwellings in the vicinity. This would lead to a density of 15 to 20 dwellings. The projected density of 30 dwellings in whatever configuration including detached, semi detached, bungalow, small terrace or staggered terrace would not be appropriate to the existing fabric of the neighbourhood. <li data-bbox="767 992 1453 1373">• It is also widely recognized at a national level that there is a shortage of quality housing for the healthy retired (for example, bungalows with gardens). Nailsea has a higher proportion of 60+ age group than the rest of North Somerset, and this type of dwelling is in short supply locally. The Charity Owners (particularly BRUNELCARE, who are focused on the care for the elderly) should allocate this land to this type of housing. This would be in keeping with the wishes of Miss Shepston, who bequeathed the land to the Charities. <p data-bbox="689 1413 1453 1476"><u>SUSTAINABLE DEVELOPMENT : NEGATIVE IMPACT ON THE ENVIRONMENT</u></p> <p data-bbox="689 1514 1453 1966">The gathering of Trees to the north west of the site will be covered by a Tree Preservation Order and excluded from any development. We appreciate the North Somerset Council stand on this matter and would resist any attempt to change this designation by the Charity owners or developers. The perimeter of the fields that include the utilities and services for Bucklands Drive and Bucklands Batch should form part of an ecological corridor or buffer. We also seek for all of the dividing hedge line between the fields to be maintained for historic field pattern as well as ecological reasons. North Somerset Council Planners require that developments include potential for bat corridors and roosts. This has not been investigated for Trendlewood Way Fields</p>

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			<p><u>SUSTAINABLE DEVELOPMENT : COMMUTING TO BRISTOL AND WESTON-SUPER-MARE</u></p> <p>Most new residents would need to commute to Bristol or Weston, because the plan does not create new jobs locally. The most likely transport use for new residents in Nailsea will be by car. An increase in the population of Trendlewood and the rest of Nailsea will increase Trendlewood Way traffic and consequently the queues of cars joining Station Road from Trendlewood Way.</p> <p><u>SUSTAINABLE DEVELOPMENT : MIXED USE</u></p> <p>The inclusion of a shopping facility is inappropriate for the area. This will increase the traffic through the area (see comments above). It is also completely unnecessary as there is ample shopping with close walking and driving distance from Trendlewood.</p> <p>A shopping facility was not part of the original Sites Allocation Policy (SAP1) in March 2016, and was not subject to comment at that stage of consultation. NSC should therefore remove it from the plans.</p>
Brunelcare & St Peter's Hospice	Brunelcare & St Peter's Hospice	14826977//1	<p>These representations relates to land at Trendlewood Way, Nailsea which is proposed to be allocated under policy SA1 and Schedule 1 thereunder.</p> <p>The land has been the subject of previous representations made in connection with the Site Allocations Plan March 2016 consultation, under comment ID: 14826977//1.</p> <p>The respondents, who are the joint-owners of the land, again support the continued proposed allocation of the land for housing, to assist in meeting the housing needs for the district. A scheme for residential development of the land is in the course of preparation, having regard to the requirements of the relevant development plan policies and other material considerations. The application, once prepared, will be brought forward for consultation and eventual submission.</p> <p>Under the "site specific details/notes" column for the land as set out in Schedule 1, reference is made to "land to be made available for local shop unit". After due consideration, this requirement is not considered to be either a viable or desirable proposition. From the limited consultation undertaken to date</p>

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			<p>and from the comments of respondents to both the March 2016 and this consultation, it is evident that this proposed reservation of a site for a shop does not have much, if any, support. For these reasons, it is respectfully requested that this specific requirement is duly deleted.</p>
Beeches		14827745//1	<p>There are good reasons for increasing the housing stock in Nailsea but this does not mean that all proposed developments should be allowed.</p> <p>In this case the proposed number of houses on the site would be in keeping with the housing density in Winchcombe Close, which is an adjacent road, <i>if</i> there were no space reserved for a shop. Allocating space for a shop and its associated parking area for wholesale deliveries and customers would increase the housing density to an inappropriate level for the area. In addition a shop would increase the traffic entering and leaving the site onto Trendlewood Way close to the junction with the busy Station Road. Currently there are occasional modest tailbacks of cars waiting to enter and exit Trendlewood Way at this junction but long tailbacks regularly occur at busy times - such as when the two local secondary schools finish and when people are driving to and from work. Adding a shop as well as thirty extra houses would have a deleterious effect on the this junction, resulting in increased emissions, delays and frustrations for drivers. A shop would increase the risk of this junction becoming an accident blackspot.</p> <p>People only value a neighbourhood shop when it does not impact on their house values or the safety and efficiency of their roads. Shops unfortunately result in more litter, noise pollution and unattractive advertising signs. Inevitably a shop attracts customers coming from some distance who do not belong to the local community - turning the area into one which feels less safe in that it's not just neighbours who are out and about. Placing a shop on this site would bring down the potential values of the thirty proposed houses and devalue the houses already present nearby.</p> <p>It is not clear that a shop here would operate profitably as there are already two others available, namely the shop at Backwell Garage and Budgens on the Wraxall road. Both of these rely on traffic along a main road. There are bungalows near to the proposed development and it might be thought that some elderly people living there would like to return to being able to buy all their weekly needs in a local shop, but they, and many busy</p>

Name	Organisation	Comment ID	Comment Recieved
			households, do not want a local shop because they prefer to use supermarkets offering home deliveries.
C Turner		15952705//1	Any development should only be low density, not the proposed high density plus shop(s). The access to the site is close to two bus stops (on both sides of Trendlewood Way) and the main road junction. Increased traffic in this area would cause increased congestion and be a danger to the many children who have to cross roads nearby on their way to local schools.
Keith Edwards		15952865//1	<p>The proposed development is not in keeping with the nature of the surrounding housing stock for two reasons; 1. The proposed density of housing is much higher and 2. The proposal includes a retail unit which is both out of keeping with the local environment and a retail unit would considerably increase the number of vehicles driving to and from the area.</p> <p>While not a planning issue I do also think that the committee (and the two charities concerned) should consider what the original benefactor, Mary Shepstone, would have thought about the proposal. I suspect that while she would have considered it to be right and proper for the charities to gain material benefit from the sale of the land, she might have also been concerned that this was being done to the determent of the local community.</p> <p>I would there ask the committee to agree to the development of the land for housing only (as Nailsea is in desperate need of more houses), but that it requires the development to be in keeping with the local environment.</p>
Christopher Turner		15958177//1	<p>I wish to comment on the proposed development at Trendlewood Way, Nailsea.</p> <p>Any development should only be low density, not the proposed high density plus shop(s). The access to the site is close to two bus stops, on both sides of Trendlewood Way, and the main road junction. Increased traffic in this area would cause increased congestion and be a danger to the pedestrians and many children who have to cross roads nearby on their way to local schools.</p> <p>I hope you will ensure that these concerns are taken into account and that only an appropriate, low density development scheme that is in character with the area be considered for approval.</p>

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			<p>Yours sincerely,</p> <p>Christopher Turner</p>
John Secker		15959041//1	<p>I am in favour of a small sympathetically designed and built development at this site but feel that 30 dwellings is far too high a density. I do not support the idea of a Shop as there are already sufficient Shops in Nailsea. A Shop on this site would inevitably increase and complicate traffic on what is already a busy road.</p>
A J Chappell		15960129//1	<p>The traffic implications of the building of 30 residential houses and a shop on this land are horrendous. At present there are problems in the morning of accessing the exist from Avening Close onto Trendlewood Way then onto Station road towards the town centre.</p> <p>The building of 30 homes with at least 30 plus resident's cars entering and existing from the estate and the closeness to the Avening Close exit, would greatly acerbate the situation. Limiting the number to 10 houses would be the maximum although still an undesirable development.</p> <p>The other major problem would be the parking of the cars within the estate and the high probability of parking on Trendlewood Way and in Avening Close that already have problems with cars being parked there with people walking to the train station.</p> <p>Hopefully these observations will be seriously considered when planning application are received.</p>
FROST		15963009//1	<p>I believe 30 dwellings is too many for this site to be in-keeping with surrounding properties. I have no objection to the site being developed providing it is of low rise and complimentary to the surrounding area.</p> <p>Any retail outlet would be totally out of place and is not needed as the town centre and two forecourt shops are within easy walking distance.</p>
James and Megan Crook		16016641//1	<p>I am writing on behalf of my Husband and myself regarding the proposed development of land at Trendlewood Fields, Nailsea. I</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>am amazed that you may be considering 30 units to be build on this land. We are totally against such a proposal for this site and set out our reasons below:-</p> <ol style="list-style-type: none"> 1. The area of land is too small for such a large development. I have lived opposite this land for 12 years and at the utmost would suggest that only 12 dwellings should be sited there. You should be looking at the size of houses and bungalows which represent the houses that surround the area at the moment. We understand that larger areas of land will be built on in the future and on these you can vary the size and type of the dwellings that will blend in with each other. Unfortunately if you carry out the suggestion of 30 dwellings on Trendlewood Fields you will be downgrading the whole of the area. 2. In your deliberations you should be considering providing a green open area with maybe a seat so that the elderly and Mothers with small children can walk to and rest. It is well known that the lady who left the land to Brunel Care and St Peter's Hospice did so for the benefit of the elderly and community. 3. However, perhaps one of the foremost problems will be the increase of traffic. At the moment it is quite difficult to gain access to Trendlewood Way due to the amount of traffic including buses and coaches. We also have cars parking in Avening Close that use the Croquet Club and residents from other roads also park in Avening Close as they are unable to park where they live. You then have people from other parts of Nailsea that park at the Station Road end of Trendlewood Way for days as they will not pay the parking fee at Backwell Station. Obtaining access into Staion Road from Trendlewood Way is a nightmare. How are we to cope with the extra cars that 30 new dwellings will bring, at the moment there are usually 2 cars to each dwelling and that doesn't include the children when they drive. <p>To complete our views, we would ask who on earth suggested a shopping facility? We were under the impression that small shops were closing down as they cannot compete with supermarket prices. This again will being more traffic into the area when they come to buy the odd item they forgot to buy at the supermarket.</p>

Name	Organisation	Comment ID	Comment Recieved
			4. We are not against development of Trendlewood Fields but you must place a realistic view on the size of this land and the surrounding area.
Mr and Mrs Southcott		16028385//1	The proposed development on Trendlewood Way is not in keeping with the nature of the surrounding housing. The proposed density of 30 houses is far too high and a shop is completely out of keeping with the local environment and would increase the number of vehicles driving to and from the area which is already extremely busy and an access route used by many children walking to school.
Rob Martin		16038369//1	<p>I am concerned at the proposal for high density housing on this site. It would be better to have low density housing in keeping with the surrounding houses. The original owner bequeathed it to the charities and wished for it to be used for community use, in particular for the elderly and a low density development of bungalows with gardens would be more in keeping with the surrounding area and would meet the needs of the local community.</p> <p>I am also concerned about the effect on wildlife of this development. The wooded area houses a badger set and this area acts as a wildlife corridor for the area that i believe is important to maintain. There are bats in the area and it is likely that this is an important roosting area for bats as well. There is a healthy population of woodland and garden birds that also rely on this area based on my personal observation.</p>
Richard Trinick	Private	16056545//1	I have summarized my full comments in the attachment which I wish to be included.
Richard Trinick	Private	16056545//2	I write as a resident of Bucklands Drive concerning the proposals for the two fields between Bucklands Drive and Trendlewood Way that were formerly owned by the late Mary Shepstone. I have lived in this home for twenty years and we knew Mary Shepstone who was actually born in our house. It would be wrong of me to say that I did not think that there should be some residential development on the fields. I understand the need but there are big issues that need to be included to receive my support. Until that time I must object to

Name	Organisation	Comment ID	Comment Recieved
			<p>the proposals. outline the issues I consider need to be included as follows:</p> <p>Density of Development: Any village, town or city has a varied fabric or context within which each part of settlement, building, road and feature is located. Without this consideration a significantly enlarged Nailsea would become an amorphous unvarying settlement of reduced character and departing from the mixed areas of the town. Our interest would be to allow a residential development to the Fields that was consistent in terms of dwelling type but also in terms of density with the dwellings in the vicinity. Whilst one needs to comply with NSC Planning requirements, this would seem to lead to a density of 15 to 20 dwellings. The talked about density of 30 dwellings that has been suggested in whatever configuration whether detached, semi detached, bungalow, small terrace or staggered terrace would not marry with the existing fabric of the neighbourhood. In addition to the planning and legal issues, this would also not be meeting the wishes of the late Miss Shepstone. As long as a developer or whatever party and their agents pursue a high level of density, this evokes a strong and sustainable response from the residents in the area and also must be of concern for the majority of residents in Nailsea. There has been some reference to a proposed shop facility but this cannot be acceptable or needed at all owing to existing shops in the local area compounded by lack of space to make such a proposal achievable.</p> <p>Infrastructure: This is a difficult one to bring into the mix at the right time. Infrastructure costs money but it will be fundamental and a pre-requisite to the sort of scale that is being proposed throughout Nailsea. By infrastructure we not only need to think about roads and services but also look ahead as to the capacity of our schools, health and social services to meet the increased needs. The comments in the 'Nailsea Action Group' objections also cover well the issues that would have a direct impact on the immediate vicinity of the Fields and surrounding premises. There are a couple of particular points that I would like to draw further attention to. The first is the impact of on street parking and inter relationship with the presence of buses on regularly used routes. The second is the number of school children who use the local roads. We have a duty of care to their futures.</p> <p>Outline and Full Planning Stages: At each stage of Planning,I resist any form of agreement of proposed high density for a development. This would include Outline, Full and also should</p>

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			<p>the fields be sold on to a Developer(s) my views would continue to apply.</p> <p>Services/Utilities and Coal: This includes our Bucklands Water Supply, Electricity, and Wessex Water Drainage from Bucklands Batch (which is routed directly down to Bucklands Drive). We believe that there is neither gas nor telecommunications routed through the fields. We understand that there is the presence of coal and former coal workings in the fields. Without compromising entitlements, access and maintenance as stated in Deeds should be maintained with any proposals. We need to have entitlements and needs both honoured and legally bound. Proposals, construction and investigatory works should not compromise existing homes, gardens or boundaries.</p> <p>Ecology and Biodiversity: The gathering of Trees to the north west of the site will be covered by a Tree Preservation Order and excluded from any development. We would suggest that the perimeter of the fields that include the utilities and services for Bucklands Drive and Bucklands Batch form part of an ecological corridor or buffer. We should also seek for all or a residual part of the dividing hedge line between the fields to be maintained for historic field pattern as well as ecological reasons. I suggest that these proposals would help to satisfy North Somerset Council Planners requirements for developments including potential for bat corridors and roosts.</p> <p>An Opportunity: The fields and other sites present an opportunity to provide new dwellings which are greatly needed. However it would be to our shame if this was mishandled with a rush and subjective intent from some to maximize the density and devastate the quality of the environment that we should all cherish. It is with this intent that I shall continue to add my voice as a resident, as a fellow resident to Bucklands Drive and thereby augmenting the 'Nailsea Action Group' statements of objection.</p>
Betty Carey		16078145//1	<p>The current proposed density is too high. The main factor for this is that it is important for the houses built to have enough green space (garden) around them to encourage wildlife as the current field is a valuable wildlife corridor between the fields and lake to the south and Trendlewood to the north. The current large hedge between the current fields should be preserved as far as possible. Badgers, foxes, bats and a large variety of birds are frequently seen in the vicinity. The proposal for a shop is not appropriate for the area both because there is a 'corner shop'</p>

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			(Backwell Motors) in the vicinity and the resulting traffic would be too great for the area.
Thomas		16081377//1	<p>Whilst some residential development is appropriate, 30 dwellings are far too many. Density should relate to the nearby housing and the semi-rural environment.</p> <p>Allotments are needed on the eastern half of Nailsea and part of this site should be allocated for that especially bearing in mind that the lady who gave the land to the charities wanted it to be for communal uses.</p> <p>A shop here is totally wrong and would not survive commercially with two good garage shops nearby and with tesco, waitrose and Iceland stores within walking distance. If it survived, it would end up as a fast food takeaway, which is completely inappropriate.</p>
J Stafford		16084513//1	<p>Key points:</p> <p>1) restrictive covenants against the land within our deeds there are restrictive covenants that are noted against trendlewood field - to ensure we maintain right of access for the conveyancing of water, and that if any development happens on the field it must align with shape and character of coveyed land (houses on Bucklands drive). I see nothing in the proposal that suggests these covenants are being appropriately reviewed with residents who are beneficiaries of these covenants within their deeds. This needs addressing in the proposal around volume of housing and access rights.</p> <p>2) infrastructure - ensuring the right infrastructure is in place before building. Increased commuting due to lack of self contained employment.</p> <p>- as a regular commuter on the train I often experience the station car park at capacity. Plans to extend this needs to be put in place to ensure we have a sustainable infrastructure in place for an increased population. Risks seeing parked cars moving further into residential areas.</p> <p>- increased traffic at trendlewood if a shop / high density houses allowed. School children using the route is high both to backwell schools and to local Nailsea schools. This traffic proposes a risk as children cross trendlewood.</p>

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			<p>- Traffic levels through backwell already causing gridlock through station road and safety of children a current issue being investigated due to lack of crossings/ safety features on the road.</p> <p>3) a low density scheme in keeping with the deeds of local residents should be explored. A shop is not in keeping with that and will create both noise, traffic, land nuisance for local residents. Not needed or appropriate.</p>
J Stafford		16084513//2	<p>On behalf of G Stafford Bucklands Lane</p> <p>Response to North Somerset Council Consultation re Housing in Nailsea, In particular Trendlewood fields possible development.</p> <p>Housing density. 30-40 houses is over development and considerably in excess of the density of housing in adjacent areas. Suitable housing in keeping with adjacent density is acceptable. Most likely the streets will be full of parked cars.</p> <p>Traffic Access into Nailsea is poor; Station road is at capacity now at certain times of the day. Other access is via Wraxall and Tickenham both via narrow roads through villages. Rat runs via the causeway and other lanes will render them dangerous for cyclists and horse riders. The station car park is full on many days; additional cars will be left in local streets and the lake car park thereby impairing the benefits of the lake/nature area to the community. Are Backwell residents ready for more parking in their streets, I doubt it.</p> <p>Town Centre Parking Car parking in the town centre at present can usually be found but an increase in the population will make it more difficult (not to mention the proposed reduction as a result of the Lidl proposal). The net result will be to drive shoppers to big super markets where parking is possible thereby reducing the viability of local shops and yet further increasing the traffic in and out the area.</p> <p>Environment. At present, foxes, badgers, owls and bats frequently are seen in and over the field and wood - are we going to evict them and</p>

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			<p>make us and our children poorer? Wildlife is under constant pressure; filling in plots of green land removes wild life corridors and drives the species to move on or die out.</p> <p>Moral issue. Mary Shepstone bequeathed the land to benefit and enhance the locality especially for the elderly. The two charities were chosen because they served the elderly. These two charities should be ashamed of themselves. Would not suitable sized bungalows for the older generation to downsize into thereby releasing larger family homes in the area be more in keeping with Mary Shepstone's wishes and enable the older generation to remain in their local community. This idea of downsizing and releasing larger properties has been voiced by the government.</p> <p>I also believe that is a covenant on the land that will have to be respected.</p> <p>Excessive development is a travesty of her wishes and should not be allowed. A moral compass is required not a greedy one.</p>
R Lecoche		16085729//1	<p>Whilst recognising the need / demand for new housing stock in Nailsea, there are a numbers of areas that need addressing regards the proposed Trendlewood development, that are not currently being covered off:</p> <p>-A low density plan, as opposed to the proposed high density plan would seem to be the only viable option to maintain integrity of the proposed site aligned with the surrounding area housing stock.</p> <p>-In line with the above there are restrictive covenants on our Bucklands Drive property that request any development must be carried out in alignment with the shape and character of the neighbouring Bucklands Drive properties. This has to be recognised in any proposal.</p> <p>-The traffic at peak times at Trendlewood Way / Station Road junction is already heavy, and the same is true 'downstream' at the station traffic lights. I question the wisdom of adding to this traffic without first proposing investment in appropriate road infrastructure.</p>

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			<p>-I have a particular concern with the safety of school children. Anyone who lives in this locality will know that there is a constant flow of cars at peak times on Trendlewood Way and Station Road, many of which are driving too fast between traffic pinch points. This combined with the high density of local schools and large numbers of children walking between Backwell and Nailsea inevitably causes danger, and accidents are happening. Road infrastructure planning, and pedestrian safety must be factored into any plan which will inevitably increase the number of cars on these same roads.</p> <p>-There is no need for a shop on this site. The area is already well serviced by other local shops, and slightly further afield a good selection of supermarkets.</p>
H Fletcher		16097761//1	<p>The nature of the housing development proposed is inappropriate as a result of</p> <ul style="list-style-type: none"> • Excessive housing density • Traffic/infrastructure requirements; and • Inclusion of a shop, compounding these issues <p>The focus should instead be to be upon providing appropriate development on the site that addresses these serious concerns.</p> <p>Housing Density</p> <p>I understand that an allocation of 30 dwellings is proposed for this site. This:</p> <ul style="list-style-type: none"> • is significantly greater than the surrounding area - contrary to NPPF Planning Practice Guideline paragraph 59, which requires planning policy to consider "<i>scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally</i>"; • is not permitted under covenants affecting the site; and • would be contrary to NPPF paragraph 60, which endorses the promotion and reinforcement of local distinctiveness. <p>Traffic/Infrastructure</p> <p>A development of the proposed scale will substantially increase traffic on Trendlewood Way. This is an important concern as</p>

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			<p>children going to local schools, including St Francis and Golden Valley Primary Schools and Backwell Secondary School, cross the road. More traffic will only increase the existing problem, which is a hazard to school children particularly in the morning when the road is also used by commuters. This would be contrary to NPPF PLanning Practice Guidance paragrah 58, which requires that developments "<i>will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development</i>"</p> <p>Proposed Shop</p> <p>The proposed shop will exacerbate each of the above issues and further contravene the planning practice guidance. The traffic issues are of particular concern. A shop on the site would, if it were successful, draw in increasing traffic, which the existing road and junction cannot safely cope with.</p> <p>An additional shop is unecessary, as there are convenience stores at the garage forecourt by the station and at the garage forecourt towards Wraxall, not far from the other end of Trendlewood Way. The focus should be on supporting the high street shops in the centre of Nailsea, which are an important part of the town.</p> <p>Development in principle</p> <p>I do not object, in principle, to housing development on this site, provided that the development benefits the neighbourhood. This would be the case if the development were in keeping with the surrounding Bucklands area and provided the above concerns were all satisfactorily addressed.</p>
Martin Merry	Morgan's Hill Protection Association	4201153//1	<p>I feel that any development on this site should be in keeping with the rest of the local area, and therefore in particular that the housing density should not exceed that in, for example, Winchcombe Close. It looks plausible that 30 houses could be built in this area without exceeding this density - but not if a shop is built as well. A shop will in addition increase the traffic on the necessarily narrow roads in the new development as well as on Trendlewood Way and the surrounding area, and is quite inappropriate in terms of the character of the area.</p> <p>I therefore object to the inclusion of a shop in this development.</p>

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Nailsea Local Ministry Group	Nailsea Local Ministry Group	5482209//1	<p>I think the field of Trendlewood Way, Nailsea once had a restrictive covenant for 'community use' but the owner's of the field were not prepared to sell it while such a covenant remained.</p> <p>I do not object to it being used for housing but feel there is, and this will increase, a need also to provide a hall or meeting place for the Trendlewood Community who show all the signs of 'straying put' and becoming older and more infirm. A place to offer help, support, meeting rooms, parent and toddler groups for younger members, lunch clubs for older friends and a meeting place on the estate for Trendlewood Church would be a great community advantage.</p> <p>The success of jubilee and royal wedding street parties and the bi-annual Community Festival show a real desire to grow community on this estate with few places to meet to further that.</p>
Tony Brown		8062241//1	<p>We object to the building of 30 houses and a shop on Trendlewood Way fields, as this would be both over-development of the land and in conflict with covenants and rights of access that that exist on the land.</p> <p>We do however support appropriate development of the fields, in line with the following:</p> <ul style="list-style-type: none"> - The deeds of several properties on Bucklands Drive include covenants stating that any future building on the fields needs to be in keeping with existing surrounding houses. On this basis, building similar properties on similar sized plots (of similar shape and character) would probably only allow up to 15 properties to be accommodated. - Also, our property along with others on Bucklands Batch and Bucklands Drive has right of access to the fields for the drawing of water from the supply that runs along their edge adjacent to our properties, but within the fields. We also have rights to erect works on the field to maintain this supply, which may require vehicular access. This will mean the portion of the field immediately to the rear of our property and all others on Bucklands Batch and Drive will need to remain accessible to us after any development is complete, limiting the space available for development. <p>Community development of the land.</p> <ul style="list-style-type: none"> - We do not believe the building of a shop is required, given easy access to shopping in Nailsea at the high street, Tesco and Budgens. There is also a local shop at Backwell Motors.

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			<p>- There are other community uses that would be welcomed for this part of the fields, such as green space, allotments or sports facilities such as tennis courts.</p> <p>- We believe that the community surrounding the fields should be consulted on the best use of the community allocation, before any planning is granted.</p> <p>Environment</p> <p>It is important for any development to include significant and continuous green space to sustain wildlife as exists in the fields currently. We regularly see badgers, foxes, bats and a variety of birds, all of whom live in the fields and the copse within them. The hedgerow between the fields should also be preserved.</p>

Section

Police Station

Name	Organisation	Comment ID	Comment Received
Naigalseye		14647553//5	<p>1) The drawings for the proposed retired persons' dwellings on this site reveal a hideous heap of rectilinear boxes resembling nothing more than a pile of shipping containers in an objectionable colour palette.</p> <p>2) The whole edifice is too tall for the site despite the claim that its roofline does not exceed others nearby.</p> <p>3) Some of the internal designs for the flats are attractive and spacious, but many look poky and cramped with internal doors too close to each other for comfort</p> <p>4) This will be the third new development for retired persons in very close proximity to two others which is not consistent with the Town Council's much vaunted housing mix policy which rightly seeks to 're-balance' the age profile of the local population and wants to promote accommodation for young people in affordable dwellings. This site would be a good place for that, close as it is to all the Town Centre amenities, the school and its out of hours sports facilities.</p> <p>5) As such this proposed development does not seem to meet the criteria of the tests of soundness nos. 1 and 2.</p>
hlove		14811233//2	<p>If NTC is trying, as they say, to change the demographic in the town away from 'older' residents, then any residences here should be for starter homes for people who need public transport/work locally</p>
Cadplan		3897665//1	<p>It would be preferable if the site was not fully given over to residential use-</p> <p>-It lies at a busy junction so to ensure reasonable living conditions any housing should be at the rear of the site not overlooking the road.</p> <p>-Undesirable to have yet more retirement housing in this part of Nailsea.</p>

Name	Organisation	Comment ID	Comment Recieved
			-Some retail/commercial use should be retained on the site particularly in view of the large number of houses which have been indicated as required to be accommodated in Nailsea.

Section

West of Engine Lane

Name	Organisation	Comment ID	Comment Received
Nathaniel Lichfield & Partners (A Evans)	Nathaniel Lichfield & Partners	11220353//1	<p>Nathaniel Lichfield & Partners Ltd (NLP) has been instructed by BDW Trading Ltd (Barratt Homes) to submit representations to the above consultation. The representations are written within the context of Barratt Homes' land interests at land west of Engine Lane, Nailsea. The site is a proposed residential allocation in the emerging Site Allocations Plan.</p> <p>By way of context, a pre application meeting was held in mid-November with officers of North Somerset Council (NSC) and public consultation on draft proposals was carried out on 15 December 2016. It is Barratt's intention to submit a full planning application in early 2017.</p> <p>As a result of positive discussions with statutory consultees and relevant officers of the Council, it has been possible to progress the detailed design of the scheme. It is therefore important for the emerging Site Allocations Plan to be consistent with the detailed considerations affecting the site.</p> <p>Land West of Engine Lane, Nailsea</p> <p>NLP continues to support the proposed residential allocation at Land West of Engine Lane. Given that Nailsea is highly constrained by a number of environmental designations (including green belt, SSSI and floodplain) developing to the west of the settlement is the only realistic direction for growth.</p> <p>As explained in our previous representations, we consider that the above site is suitable for residential development. It is located in an area which is free from significant environmental constraints such as Green Belt, SSSI, AONB or flood zone. It is also in a sustainable location, within walking distance of a range of services and facilities including a Co-operative supermarket (Hannah More Road), a butcher (North Street), Hannah More Infant and Grove Junior Schools (Whiteoak Way) and employment opportunities at West End Trading Estate located off Engine Lane. Our previous representations also explained that there would be limited landscape impact P2/4 12850148v3</p> <p>given that the visual context for the site is urban edge and that the proposed development would be complimentary and seen as a natural extension to the urban edge.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>The Draft Site Allocations Plan (consulted upon between 10 March and 28 April 2016) set the capacity of the site at 180 units. Our representations to the Site Allocations Plan confirmed that the site is capable of delivering up to 195 units. We are therefore pleased that the Publication version of the plan has been amended to reflect our previous representations. NLP considers that it is important for the emerging Plan to embody sufficient flexibility to allow the above site to deliver up to 195 dwellings, particularly as Nailsea needs to deliver a minimum of 1,100 units within the plan period.</p> <p>As detailed above, Barratt Homes intends to submit a full planning application in early 2017 which will assist NSC in seeking to demonstrate a 5 year housing land supply.</p> <p>Site Specific Details / Notes – Schedule 1</p> <p>The site specific details / notes for Land West of Engine Lane sets out a number of considerations:</p> <ol style="list-style-type: none"> 1 New allocation 2 Access off Engine Lane 3 Strong hedge boundaries to be retained 4 Footpath on western side of Engine Lane 5 Full Transport Assessment required 6 Replacement or improved sport facilities required 7 Housing mix to meet local needs 8 Consideration of fact that site is within 5km consultation zone for Bats SAC <p>In the light of the emerging detailed design proposals for the site which have been influenced by consultee and stakeholder comments, set out below is an updated position in respect of relevant considerations that should be reflected in the emerging Plan.</p> <p>Strong hedge boundaries to be retained</p> <p>Following discussions with National Grid it has become apparent that it will not be possible to retain the existing hedge boundaries along Engine Lane. This is because the planned</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>route of the undergrounded power lines associated with the Hinkley Point C project will run along Engine Lane. Likewise the realigned water main to facilitate the development of the site will run along Engine Lane. The undergrounded power line requires an 8m easement and the re-aligned water main requires a 10m easement. The required easements present restrictions in terms of landscaping and planting. This means that the existing hedgerow along Engine Lane cannot be retained (as the draft policy requires) and a replacement native hedgerow will be planted in between the two easements which will be further set back into the development site. The hedgerow boundaries along the south and west of the site will be retained and strengthened.</p> <p>We therefore object to Schedule 1 of the Site Allocations Document as currently drafted and consider that the wording should be amended as follows to ensure that the emerging Plan is 'justified':</p> <p>"Strong hedge boundaries to be retained where practicable. Where this is not possible, replacement hedgerow should be provided"</p> <p>The issue of planting and landscaping on the easements was discussed and agreed during the pre-application meeting with the Council. It was explained that the proposed development of land west of Engine Lane has been designed so as not to prejudice the ability of National Grid to underground the off-site power lines along the southern site boundary and along Engine Lane in due course.</p> <p>Housing mix to meet local needs</p> <p>The site specific details appear to require the proposed housing mix to meet local needs. Whilst the proposed development, including the range and mix of housing has been developed in collaboration with key stakeholders and will reflect local needs, we consider that a policy requirement to specifically meet local needs conflicts with the Inspector's Report into the Core Strategy remitted policy for Clevedon, Nailsea and Portishead (Policy CS31). The Inspector states:</p> <p>"The local support requirement is omitted and the issue of local housing need is changed to require a broad range of housing types to meet all requirements."</p> <p>We therefore object to the wording as currently drafted. We consider that the wording fails the <i>'positively prepared'</i> test of</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>soundness as the text as currently drafted will hinder the delivery of housing to meet the housing requirement.</p> <p>NLP considers that in the interest of consistency and to ensure that the emerging Plan is ‘positively prepared’ the wording of the Site Specific Details in Schedule 1 should be amended to read:</p> <p>"A broad range of housing types will be required to meet all requirements."</p> <p>Consideration of fact that site is within 5km consultation zone for Bats SAC</p> <p>We consider that the potential effect of development at Nailsea on the North Somerset and Mendips Bat Special Area of Conservation (SAC) is a matter that needs to be addressed on a strategic level by North Somerset Council. This is particularly important as the vast majority of the planned development at Nailsea is located to the west of the settlement which may be located within the ‘Strategic Flyway’ for horseshoe bats.</p> <p>Whilst on site mitigation will be provided at land west of Engine Lane, financial contributions will also be made available to North Somerset Council for the delivery in part of compensatory habitat. We consider that the emerging Plan is the appropriate forum to identify any such necessary land to deliver a strategic solution.</p> <p>Habitat Regulations Assessment</p> <p>As explained at paragraph 3.8 of the Plan, an appropriate assessment must be made before a local authority can authorise a plan or project which is likely to have a significant effect on the integrity of a European site.</p> <p>Para 3.10 of the Publication Version of the Site Allocations Document states that: P4/4 12850148v3</p> <p>"A Habitats Regulations Assessment (HRA) will be submitted at the Publication Plan stage. The Core Strategy has indicated the need for HRA of the Site Allocations Plan, including consideration of the potential for possible effects on bats associated with the Bats Special Area of Conservation (North Somerset and Mendip Bats SAC)."</p> <p>We are concerned that a HRA has not been prepared to date but understand from the Council that it will be prepared prior to</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>submission of the Plan for examination. We look forward to reviewing the draft HRA prior to submission.</p> <p>Summary</p> <p>NLP fully supports the inclusion of land west of Engine Lane within the Site Allocations Plan. The site is sustainable, deliverable and has been brought forward in collaboration with Nailsea Town Council.</p> <p>However, we consider that there are a number of changes required to the text at Schedule 1 to ensure that the emerging Plan is sound. In addition, we look forward to reviewing the draft HRA in due course.</p>
Naigalseye		14647553//6	<p>The proposal to develop this site appears to contravene many aspects of planning policy and advice as illustrated in other responses including the four tests of soundness and the guidance contained in the National Planning Policy Framework:-</p> <ol style="list-style-type: none"> 1) The site is green field, not brownfield . 2) It is an unacceptable distance from the town's central amenities. 3) Traffic generated by the new houses, particularly in conjunction with that from other very nearby proposed developments, will create significant congestion and delays at a number of critical local junctions such as the Backwell crossroads. 4) The mitigation at some of these junctions is admitted to be very limited. 5) Traffic surveys carried out independently but to the standards, methods and algorithms of North Somerset Highways indicate, a far less rosy picture of the effects of increased housing on the local road and lane infrastructure which in many places is narrow and constricted either by natural boundaries or parked vehicles, leading to, in a number of significant locations, single track working.

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			<p>6) The site is identified as of good quality agricultural land.</p> <p>7) Local flora and fauna, of which there is plenty and some rare, will be at least seriously displaced if not destroyed at a time when we are being exhorted to value, cherish and conserve our local open spaces in, near, or on the edge of our urban areas.</p> <p>8) At the Barratts exhibition in the Vestry Hall of Christ Church, Nailsea, on 15 December, one of the declared opportunities was stated to be that the development will create an appropriate edge to Nailsea. What is inappropriate about the present edge which was established after the huge expansion of the town in the 1960s and early 70s to prevent any overload of the town's amenities by further enlargement?</p> <p>9) The housing density is deemed to be likely to be higher than the national average for a site of this nature and certainly very much higher than for the surrounding dwellings.</p> <p>10) Some spokespeople at the Barratts exhibition indicated that building on this land was a foregone conclusion: this at a time a week before the Town Council's meeting at which it is likely there will a motion to proceed with a sale, but there is no certainty at the time of this submission</p> <p>11) The site has been identified as part of the ancient unchanged mediaeval landscape of old Somerset.</p> <p>12) The Town Council opposes development on most of the sites very close to the west of Engine Lane, for reasons that could easily be as well applied to the west of Engine Lane, but, inconsistently, are not. The Town Council's ownership (on behalf of and in trust for, the people of Nailsea) is over influencing their decision not to object to its sale.</p> <p>13) There is a long established restrictive covenant on four acres of this proposed development forbidding residential development.</p> <p>All the above suggest that this site does not meet the expectations enshrined in the four tests of soundness particularly for sustainability (part of No. 4), infrastructure requirements (part of No. 1), and consistency with national policies (No.4).</p>

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Mr & Mrs G Williams		14665377//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas</p>
Barry James		14813185//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p>

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			<p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas</p>
D Wheeler		14814497//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p>

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			<p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas</p>
MaryL		14814817//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout of the plans made viewing extremely difficult.</p> <p>The 'exhibition' held by Barratt's at Christ Church Nailsea on 15 December 2016, of their housing development at Engine Lane, was very misleading as only a few of the proposed number of houses were drawn on the plan.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and</p>

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			<p>environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> a) Distance from amenities, bus stops and railway station; b) Lack of capacity on rail services and the railway station car and cycle parking. Also there is no wheelchair or pushchair access to the railway station; c) The loss of grade 2 agricultural land; d) Loss of highly valued landscape as identified by the Core Strategy; e) Loss of recreational open space, <u>Nailsea has very little accessible open space and is currently well below the recommended level advised by World Health Organisation;</u> f) Negative impact on ecology, including bats' foraging route; g) Lack of local employment opportunities. <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas.</p>
Mr & Mrs Baddeley		14815009//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p>

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			<p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas</p>
Jitendra Bhardwa		14819169//1	<p>I wish to object to the present plans by Barratt's to build houses at Engine Lane, Nailsea. We welcome properly planned and well researched house building, but this one appears to be confused and random. The Land is pristine green land, to be used for the public good, not for quick profit by developers. There is a covenant on that land, that no houses should be built on it, yet the Nailsea Town Council is ignoring this. Part of the land is already well used by the Rugby Club, with hundreds of youngsters enjoying their training and practice, throughout the week, mainly Sunday mornings. These excellent leisure facilities will be curtailed or may disappear altogether if housing is built nearby. The land will lose its beautiful views, which part of the enjoyment of the sports activities. In the rush to make a tidy profit by the developers, all these wonderful facilities will be lost. I'm sure the developers can find more suitable land to build, to satisfy the Government policy on providing sufficient houses to meet demand for the next decade. The Council's planning process should consider the profit motive of the developers as a principal criteria, and refuse any permission where excessive profit is thought to be made, at the</p>

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			<p>expense of irreplaceable and beautiful public spaces. I have three children who will need housing of their own when they start families, and I cannot deny them that that right. But it must be done for the children's benefit, not for quick profit of the developers and any or all public authorities involved. There is plenty of alternative land around Nailsea (brown field sites) where housing will be more suitable, within easy walking distance of the Town Centre, and good transport connections to Bristol. Engine Lane has narrow roads, is far from the Rail Station, and the buses are infrequent. Therefore I recommend that the planning processes for building on all green land such as Engine Lane be made more rigorous and far-reaching, at the moment there are too many short-cuts and loop holes that developers can take unfair advantage of. If the process is made more robust, I will re-consider my objections in a more positive light.</p>
Jantone	Mrs	14820417//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site the plan appears not to have given enough regard to the improvements in infrastructure needed to avoid the highly likely impact of increased traffic in and around the area. As you will be well aware the area is rather remote from amenities and surrounded by narrow country lanes.</p> <p>I ask that the plan for Engine Lane does not proceed further for fear of road traffic accidents and damage to the local environment that such a development will, almost inevitably, cause.</p>
Nailsea Action Group	Nailsea Action Group	14823809//6	<p>The consultation arrangements for the plan were not sufficient to allow appropriate engagement with the public. See our comments on the consultation arrangements page.</p> <p>The plan does not meet the tests of soundness with respect to the West of Engine Lane site as follows:</p> <p>Sustainability (relating to being positively prepared)</p> <p>The expectations contained within the tests of soundness particularly with regard to sustainability are not met by</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>developing this green field area of good agricultural land a significant distance from most the town's amenities on what will be an inadequate road infrastructure. A summary of the lack of sustainability of this site follows; more detail is provided in the attachment (SAP2 sustainability assessment West of Engine Lane).</p> <ul style="list-style-type: none"> • distance from amenities (requiring car use), • distance from rail station and bus stops, • acknowledgement that most new residents would commute to Bristol or Weston-Super-Mare, despite the limitations of access to bus and rail transport, • building on greenfield sites of high agricultural grade • loss of valued landscape, with no possible mitigation, • negative impact on the environment, • loss of open space used for recreation and wellbeing <p>Justified compared to reasonable alternatives and based on proportionate evidence</p> <p>The plan is not justified in respect of this site:</p> <ul style="list-style-type: none"> • most alternative sites considered are not reasonable, because they are further from facilities, amenities and infrastructure, • those alternative sites that are not further have been rejected on the basis of distance from facilities (e.g. West of the Rugby Club), which demonstrates that the plan is not based on proportionate evidence, • the sustainability assessment was not prepared using criteria from the sustainability scoping assessment (see the attachment 'SAP2 sustainability main assessment West of Engine Lane' for more details), • some of the evidence used in the sustainability assessment is not based on reasonable measures. For example, landscape impact is based on 'general views from public vantage points'. However, the photos shown in the sustainability assessment attached demonstrate that the assessment given is not reasonable, because there would be significant landscape impact from public vantage points. • as noted below in number of houses allocated, decisions about housing density have not been applied consistently to this site compared to others, which undermines the justifiability of the plan in respect to this site.

Name	Organisation	Comment ID	Comment Recieved
			<p>Therefore the conclusions reached in assessing this site as suitable for inclusion are not justified in the context of the tests of soundness and the site should not be included.</p> <p>Deliverability of plan - inconsistent application of policies</p> <p>Inconsistent application of policies is not consistent with a deliverable plan, as required by the tests of soundness. We would like to point out that including this site for development is inconsistent with policies included in this plan: SA7 and/or SA8. We would propose that this site is designated as local green space (see comments for local green space). However, even if this were not granted, the site should be undesignated green space on the basis that policy SA8 states: “Within settlements planning permission will not be granted for development that unacceptably affects the value of undesignated green space making a worthwhile contribution to amenity and/or the townscape, character, setting and visual attractiveness of the settlement.” This site provides valuable amenity value in the form of valued open space, is typical of the character of the area and, being part of the Nailsea Farmed Coal Measures landscape, has been identified by the Landscape Character Assessment as being a “remote intimate scale landscape with peaceful ambiance” and a “coherent and distinctive survival of medieval landscape”. The site therefore would be more suitable as designated open space based on the contribution to the visual amenity, landscape, character and setting.</p> <p>Consistency with national policy</p> <p>The plan has many inconsistencies with national policy in respect of this site as set out in the remainder of this section and therefore does not meet the tests of soundness.</p> <p>North Somerset response to objections</p> <p>The Executive Committee Report notes that there was significant opposition to sites in Nailsea, with objections citing distance from amenities and other factors identifying the site as unsustainable. The response in the report is to agree that they are far from the town centre and not to disagree with these objections, thereby also clearly implying acknowledgement that the sites are not sustainable, but to state that development is possible without significant harm to the landscape. We agree that part of the West of Engine Lane area was correctly excluded from development due to landscape impact. However,</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>we disagree strongly that the site included for development would not also have a significant landscape impact. It would not be possible to develop this site while maintaining the visual amenity of the landscape for users of Engine Lane and the PROWs on the site and beyond. The site is of an open aspect and is a coherent part of the Nailsea Farmed Coal Measures (see below). Therefore development on the site would result in loss of valued landscape that cannot be mitigated. Our view is consistent with the conclusion in the Joint Spatial Plan, that development in south and west Nailea involves landscape of high sensitivity and the impact cannot be mitigated. The justification for inclusion of this site is therefore inconsistent with evidence in the Joint Spatial Plan and NPPF requirement to enhance and protect valued landscapes and so this site should not be included for development.</p> <p>Number of houses allocated</p> <p>We are concerned about the number of houses allocated to the site. 195 houses on a 19 acre site would result in a density of 25 houses per hectare if no open space were left. Given that to meet the NPPF good design requirement to include open space (paragraph 58), the density in the built area would exceed 25 houses per hectare. This is likely to be further exacerbated by the need for mitigation of the bat foraging corridor known to cross the site. This density would be above the average density for new housing developments (www.insidehousing.co.uk/journals/insidehousing/legacydata/.../IH.060623.035-037.pdf) and would not respect the local context, which has relatively low density. This contravenes Planning Practice Guidance paragraph 58, which requires developments to “respond to local character” and paragraph 59, which requires planning policy to guide “scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.”</p> <p>We also note from the Executive Committee Report that number of housed allocated to the Uplands was reduced partly to make development more consistent with the surrounding area. While we support this change, we object to the inconsistent approach to housing density, because the density proposed for the West of Engine Lane is much greater than for the surrounding area. This inconsistency undermines the justifiability and therefore soundness of the plan.</p> <p>Landscape impact</p>

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			<p>This site is part of the Nailsea Farmed Coal Measures, of which only a small part remains. The Landscape Character Assessment identifies the need to conserve this historic medieval landscape, which is almost unique to the district through traditional farming methods e.g. grazing. The Core Strategy CS5 requires planning to pay close regard to the landscape characters in North Somerset (which include the Nailsea Farmed Coal Measures) and “protect, enhance and respect the landscape”. This clearly demonstrates that the Nailsea Farmed Coal Measures are considered to be a valued landscape. Also, it should be noted that the Joint Spatial Plan Sustainability Assessment identifies this landscape to be of high sensitivity and the impact of development cannot be mitigated. Therefore, development in this area would breach NPPF paragraph 109, which requires planning policy to “protecting and enhancing valued landscapes”. For photos of landscape impact from public vantage points, see the attachment 'SAP2 sustainability main assessment West of Engine Lane'.</p> <p>Infrastructure requirements</p> <p>The plan states that infrastructure requirements will be considered for sites at the planning application stage. However, this is not consistent with national policy. NPPF Planning Practice Guidance for Local Plans, paragraph 018, requires that “The Local Plan should make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development.” Since this plan is for the next 5 years, it should include infrastructure requirements as described.</p> <p>Further, the recent Youngwood Lane planning application (16/P/1677/OT2) included a transport assessment using methods approved by North Somerset Highways. This assessment demonstrated that the expected impact by 2021 of future traffic including the sites proposed in the Sites and Policies Plan would result in severe impacts on the local road network. This indicates that the plan is not deliverable without further investment in infrastructure, which has not been planned for or had funding secured.</p> <p>Impact on rights of way</p> <p>Planning should protect and enhance rights of way (Planning Practice Guidance paragraph 75). However, development on the site will be to the significant detriment of public rights of way (PROW's). What are currently rights if way across open spaces,</p>

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			<p>which are peaceful and scenic will become restricted muddy paths, with former views obstructed by modern housing. One of the West of Engine Lane PROWs is also a bridlepath so would be even more negatively affected by being restricted - the path will become far more muddy and slippery and forward visibility will be reduced, making the route less safe than it currently is.</p> <p>Positive aspects of the plan</p> <p>While we strongly object to the inclusion of this site in the plan as described above, we do appreciate the following aspects in respect of this site:</p> <ul style="list-style-type: none"> • The retention of hedgerow boundaries. These are important for wildlife and the character of the area. We would also ask that retention of the dry stone walls is required, because they are equally important to local ecology and character (NPPF paragraph 109 requires development to minimise impacts on biodiversity and paragraph 58 requires development to “respond to local character and history, and reflect the identity of local surroundings”. • Consideration of fact that site is within 5km consultation zone for Bats SAC. As noted above, the impact on bat foraging corridors should be effectively mitigated, as required by NPPF paragraph 109, which requires development to minimise impacts on biodiversity. <p>In conclusion, despite there being some positive aspects of the plan in relation to this site, the reasonable conclusion based on NPPF requirements (per the comments above) is that the West of Engine Lane site has not been demonstrated to be suitable for development and should be open space.</p>
RStokoe		14827329//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is</p>

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			<p>greenfield, remote from amenities and surrounded by narrow country lanes</p> <p>The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, • pavement on east side of Engine Lane allows walkers to walk close to countryside and observe wildlife
HEllis		14827873//4	See attached file 'HE Objections to SAP2'
DW		14830529//1	<p>My earlier objections to the 1st version of the Site Allocations Plan still stand. Namely that:-</p> <ol style="list-style-type: none"> 1) The proposed development is outside the current settlement boundary 2) It has no definable boundary and no defensible boundary and would encourage continued development further into the Countryside encroaching on and swallowing up other villages 3) Both parcels of land - Gaulacre & the land currently leased to the Rugby Club are valuable green space for the community of Nailsea. The land used by the Rugby Club is well-used by rugby juniors, dog-walkers, children practicing other sports, the running club, local sports competitions. Sport England would not support the loss of sports fields for development in this manner. 4) the Town has very little provision for recreation space. This land should be protected as green recreation space 5) Part of this land is Grade 2 agricultural status and should not be built on. Another part was sold by Avon County Council and purchased by Nailsea Town Council with the full knowledge

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			<p>that it contains a Restricted Covenant to prevent the land from ever being used for residential development</p> <p>6) This land has not been subject to an uptodate ecology survey and previous ones undertaken noted the presence of rare flora and fauna which should be protected eg devils bit scabious, bat habitat, possible great crested newts, trees & hedgerows etc etc. It would result in loss of trees and hedgerows</p> <p>7) this area is located within a former coalfield area and has not been subject to sufficient archaeological review</p> <p>8) this area is already subject to flooding. Climate change and the loss of this green space will only increase such instances</p> <p>9) the infrastructure is insufficient - these are country lanes that cannot cope with such an increase in traffic. These lanes will no longer be safe for cyclists (including part of the Avon Way) and horse riders and walkers</p> <p>10) this land is too far removed from the Town Centre and is not on a public transport route to make it a feasible option. It would result in residents using unsustainable forms of traffic ie private cars</p> <p>11) there is no employment in Nailsea, occupants would commute into Bristol/Weston. The rail line between Nailsea and Bristol is already operating at full capacity, you cannot find an empty space to stand on Nailsea/Backwell platform during the rush hour and the newly redeveloped station carpark is already full.</p> <p>12) To allow development off Engine Lane will have an adverse impact to the landscape and the rural nature of this part of the town and surrounding villages/hamlets</p> <p>13) The plan for 195 houses on such a site is too many, Barratts and the Town Council themselves both admit that the density of building is too high. This is not in keeping with the surrounding housing density and layout</p> <p>14) loss of outlook and privacy for the existing residents (and for the new residents given the high density of housing and the proposals to build 3 storey town houses)</p> <p>15) noise and disturbance</p>

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			<p>16) the physical infrastructure will not cope, not just the roads but also the water system, public drainage etc</p> <p>17) there is a lack of social facilities in nailsea ie number of school places, number of doctors surgeries in the area etc</p> <p>18) These houses are being described as “affordable” when in actual fact, only 50 of the 190 will be officially classed as affordable.</p> <p>This site goes against the fundamentals of the council's core strategy is so many respects. We need to push for a review of the Green Belt and the option to expand Nailsea to the north and east.</p>
OSpartan		14830785//1	<p>I object to the inclusion of the West of Engine Lane site. It is too far from facilities and public transport. The site cannot provide sustainable development. The sustainability criteria do not appear to be applied consistently so the plan cannot be considered justified.</p>
Linda Cripps		14836001//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station;

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			<ul style="list-style-type: none"> • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas</p>
Chris Solway		15942497//1	<p>I am a resident of Engine Lane, Nailsea, and I see the use that land currently under covenant to sport and leased to Nailsea and Backwell Rugby Club is used, particularly at weekend when it is used by many young children playing sport. The council has recently rejected lifting the covenant, quite rightly in my view, as it is too expensive and therefore the residential development plans have been thrown into some confusion.</p> <p>It is easy for us residents to say ' not in my back yard' and any comment we make is bound to be viewed that way, but to build houses on a site that is so clearly used for sport by all ages (rugby, five a side football, running, dog walking and just plain strolling in the country)is obviously not in anyone's interests. The plot is too far from amenities for young families with limited transport (the target area for houses) And to loose such a space and waste council money is just plain wrong.</p> <p>There is a need for housing and that is a fact that we all have to accept. There are new elderly residents properties being planned for the town centre, surely small family homes near to schools and shop would be welcomed there too.</p> <p>One suggestion raised in the local paper was to build a new school on the Engine Lane site and redevelop the current Grove / Hannah Moore school site, but the comment made was that the current school plot was too small. That at the time was clearly correct. But now that the rugby field is in question the plot available to Barretts is considerably smaller. The cost to remove the covenant would be some 1.2 million I believe. Would it now be a consideration to look at building a new</p>

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			<p>school on the fields known as Goulacre in Engine Lane, putting a car park/ drop off area to the north of that plot next to the rugby field in question. The school would be able to use the rugby field for sports and events all week and then the rugby club and other sports would be able to use it and the car park at weekends and school holidays. That way perhaps the covenant need not be touched, 1.2 million is spent on a school rather than some paper exercise, the town keeps some loved and well used facilities, the road would not be congested due to the parking, Nailsea gets a new purpose built school and Barretts get to build houses on the old school site, which is closer to the towns facilities, on a bus route for young families and close to the new school.</p> <p>Just a thought.</p>
Chris Solway		15942497//2	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy;

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			<ul style="list-style-type: none"> • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas</p>
Peter Wright		16066401//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the "4 tests of soundness".</p> <p>In particular, I would like to raise the following objections:</p> <ul style="list-style-type: none"> • The level of community engagement in Nailsea was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea Library was not effective, because it was not publicised well and the layout at the venue did not allow for easy viewing of the plans. The consultation website was confusing and made objecting difficult. • This site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes. • The sites does not meet the requirements for sustainable development for the following reasons: <ul style="list-style-type: none"> - Distance from amenities, bus stops and rail station; - Lack of capacity on rail services and rail station car/cycle parking; - The use of grade 2 agricultural land (highest grade in the area); - Loss of a highly valued landscape; - Negative impact on ecology, including bats' foraging route; - Loss of recreational open space. • North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has been chosen due to green belt and flooding restrictions in other areas.

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Joan Wright		16066753//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the "4 tests of soundness".</p> <p>In particular, I would like to raise the following objections:</p> <ul style="list-style-type: none"> • The level of community engagement in Nailsea was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea Library was not effective, because it was not publicised well and the layout at the venue did not allow for easy viewing of the plans. The consultation website was confusing and made objecting difficult. • This site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes. • The sites does not meet the requirements for sustainable development for the following reasons: <ul style="list-style-type: none"> - Distance from amenities, bus stops and rail station; - Lack of capacity on rail services and rail station car/cycle parking; - The use of grade 2 agricultural land (highest grade in the area); - Loss of a highly valued landscape; - Negative impact on ecology, including bats' foraging route; - Loss of recreational open space. • North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has been chosen due to green belt and flooding restrictions in other areas.
Mrs J T Haskins		16066817//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the "4 tests of soundness".</p> <p>In particular, I would like to raise the following objections:</p> <ul style="list-style-type: none"> • The level of community engagement in Nailsea was not sufficient for a consultation of this level of impact.

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			<p>The public engagement event in Nailsea Library was not effective, because it was not publicised well and the layout at the venue did not allow for easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <ul style="list-style-type: none"> • This site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes. • The sites does not meet the requirements for sustainable development for the following reasons: <ul style="list-style-type: none"> - Distance from amenities, bus stops and rail station; - Lack of capacity on rail services and rail station car/ cycle parking; - The use of grade 2 agricultural land (highest grade in the area); - Loss of a highly valued landscape; - Negative impact on ecology, including bats' foraging route; - Loss of recreational open space. • North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has been chosen due to green belt and flooding restrictions in other areas.
C J Haskins		16066849//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the "4 tests of soundness".</p> <p>In particular, I would like to raise the following objections:</p> <ul style="list-style-type: none"> • The level of community engagement in Nailsea was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea Library was not effective, because it was not publicised well and the layout at the venue did not allow for easy viewing of the plans. The consultation website was confusing and made objecting difficult. • This site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the

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			<p>site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <ul style="list-style-type: none"> • The sites does not meet the requirements for sustainable development for the following reasons: <ul style="list-style-type: none"> - Distance from amenities, bus stops and rail station; - Lack of capacity on rail services and rail station car/cycle parking; - The use of grade 2 agricultural land (highest grade in the area); - Loss of a highly valued landscape; - Negative impact on ecology, including bats' foraging route; - Loss of recreational open space. • North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has been chosen due to green belt and flooding restrictions in other areas.
Carl Guinney		16066913//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the "4 tests of soundness".</p> <p>In particular, I would like to raise the following objections:</p> <ul style="list-style-type: none"> • The level of community engagement in Nailsea was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea Library was not effective, because it was not publicised well and the layout at the venue did not allow for easy viewing of the plans. The consultation website was confusing and made objecting difficult. • This site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes. • The sites does not meet the requirements for sustainable development for the following reasons: <ul style="list-style-type: none"> - Distance from amenities, bus stops and rail station; - Lack of capacity on rail services and rail station car/cycle parking; - The use of grade 2 agricultural land (highest grade in the area);

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			<ul style="list-style-type: none"> - Loss of a highly valued landscape; - Negative impact on ecology, including bats' foraging route; - Loss of recreational open space. • North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has been chosen due to green belt and flooding restrictions in other areas.
Tony P		16069185//1	<p><u>Re: Objection to the Site Allocations Plan 2006 - 2026: Publication Version November 2016 for Nailsea</u></p> <p>My wife and I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the "4 tests of soundness".</p> <p>Additionally, we would like to make the following comments:</p> <ol style="list-style-type: none"> 1. Whilst we acknowledge that we have to accept some development in order for government guidelines to be met, we feel that the total inadequacy of the present infrastructure to cope with massive increases in vehicular activity that this would create has been misunderstood and grossly under-estimated. Having lived with the present problems that "driving to school" has created - i.e buses held up, parking on both sides of Whiteoak Way, the narrowness of St Marys Grove (where no footpath exists) and extra vehicles in Engine Lane travelling to Hannah More School and also the children's nursery in Worcester Gardens. The suggestion that walking to school is the answer is totally unrealistic. 2. Local facilities i.e. Doctors, Dentists, Schools are already stretched. Car parking provision is already severely compromised. You mention that use of Nailsea & Backwell station would be increased and the parking facilities for this are already bursting at the seams - now local roads, in particular Trendlewood Way, are experiencing much increased street parking, using both sides of the road. Station Road in Backwell has already seen 2 incidences of pedestrians walking on the narrow pavement being hit by vehicles. 3. As much of the proposed new housing will be "affordable" it begs the question of how those new inhabitants will travel to

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			<p>work, or even just to shop in Nailsea. Many Nailsea residents either work in Bristol or Weston-Super-Mare, and this will result in much increased traffic along lanes which are too narrow for two cars to pass each other. The town centre is too far to walk, the station is not convenient unless travelled to by car.</p> <p>4. The site is a haven for wildlife (herons, rabbits, foxes, bats, and all types of birds. (I have photo evidence of many of these including a rare sighting of a woodcock). The site is also liable to flooding (photos of this also).</p> <p>Addressing all the problems associated with the present infrastructure is essential before any house building could ever be considered. We also add that the land in question was covenanted "in perpetuity" for the recreational use only of the local community.</p>
P Stillwood		16069889//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the "4 tests of soundness".</p> <p>In particular, I would like to raise the following objections:</p> <ul style="list-style-type: none"> • The level of community engagement in Nailsea was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea Library was not effective, because it was not publicised well and the layout at the venue did not allow for easy viewing of the plans. The consultation website was confusing and made objecting difficult. • This site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes. • The sites does not meet the requirements for sustainable development for the following reasons: <ul style="list-style-type: none"> - Distance from amenities, bus stops and rail station; - Lack of capacity on rail services and rail station car/cycle parking; - The use of grade 2 agricultural land (highest grade in the area); - Loss of a highly valued landscape; - Negative impact on ecology, including bats' foraging

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			<p>route;</p> <ul style="list-style-type: none"> - Loss of recreational open space. • North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has been chosen due to green belt and flooding restrictions in other areas.
M Reali		16069921//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the "4 tests of soundness".</p> <p>In particular, I would like to raise the following objections:</p> <ul style="list-style-type: none"> • The level of community engagement in Nailsea was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea Library was not effective, because it was not publicised well and the layout at the venue did not allow for easy viewing of the plans. The consultation website was confusing and made objecting difficult. • This site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes. • The sites does not meet the requirements for sustainable development for the following reasons: <ul style="list-style-type: none"> - Distance from amenities, bus stops and rail station; - Lack of capacity on rail services and rail station car/cycle parking; - The use of grade 2 agricultural land (highest grade in the area); - Loss of a highly valued landscape; - Negative impact on ecology, including bats' foraging route; - Loss of recreational open space. • North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has been chosen due to green belt and flooding restrictions in other areas.

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			<ul style="list-style-type: none"> Whomsoever thinks 3,800 new homes new homes can be squeezed into the confines and boundary of Nailsea does not know much if anything about our town.
Julie Webster		16097121//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> Distance from amenities, bus stops and railway station; Lack of capacity on rail services and the railway station car and cycle parking; The use of grade 2 agricultural land (highest grade in the area); Loss of highly valued landscape as identified by the Core Strategy; Negative impact on ecology, including bats' foraging route; Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas.</p>

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Robin and Carol Langford		16097857//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas</p>
Mr and Mrs T Willis		16098017//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p>

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Mr and Mrs Morse		16103361//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p>

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R J Theis		16103457//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p>

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Frank Gilbert		16103553//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking;

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Adam Kelly		16103681//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route;

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J Elford		16103937//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are</p>

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Mr and Mrs Crofts		16104129//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, ; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas</p>
J T Banfield		16104609//1	I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that

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K Cook		16104769//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p>

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Mrs C Hellawell		16104929//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p>

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Mr T E Dyer		16105089//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p>

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J Ferrell		16105249//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking;

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Michael Horler		16105345//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route;

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Chris Foggin		16105505//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are</p>

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Sally Barker		16110721//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas</p>
Elizabeth Saddington		16110817//1	I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that

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Helen Horler		16110881//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p>

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Colin Griffin		16111073//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p>

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Barbara Griffin		16111169//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p>

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Tim and Lynda Pullin		16111265//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking;

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Mr A A Shorney		16128225//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route;

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			<ul style="list-style-type: none"> • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas</p>
W Barnes		16128257//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are</p>

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			acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas
Mrs A Parussini		16128321//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas</p>
S Howells		16128353//1	I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that

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			<p>in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas</p>
Mrs M E Harvey		16128449//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p>

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			<p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, • <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas</p>
John Fox		16128513//1	<p>I wish to object to the site West of Engine Lane in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue</p>

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			<p>did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the site is greenfield, remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space, <p>4) North Somerset Council's responses to objections do not adequately address the objections raised. From responses to objections it appears that the sustainable development issues are acknowledged but the site has still been chosen due to green belt and flooding restrictions in other areas</p>
North Somerset Internal Drainage Board (Simon Bunn)		16130337//18	<p>Just outside of the Board's district but will drain into the Board's district.</p> <p>Significant drainage issues in downstream catchment, development should contribute to reducing existing flood risk.</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>Development will be expected to contribute to reducing existing flood risk.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>
Cadplan		3897665//2	<p>Concerned that the road network is unsuitable in this area to accommodate additional houses</p>

Section

Land south of The Uplands

Name	Organisation	Comment ID	Comment Received
Reis Braganza	Nailsea Action Group	14666145//2	<p>This area is used by up to 100 individuals every day. It provides a most valuable leisure facility for its many users. Walkers (both individuals and groups), joggers, running clubs, dog walkers and dog trainers are seen enjoying it at all hours.</p> <p>With the release of the JSP / JTS policies and proposed sites for development, the retention of this area as greenfield becomes even more important. The area south of this field could be heavily developed if the JSP site locations are utilized. The proposals for development of Youngwood Farm are already underway, and this site is adjacent to the fields south of the Uplands.</p> <p>I Repeat the following from the spring consultation: ‘Grounds 1 and 2 of the 1976 planning refusal fully recognise these attributes by concluding:</p> <ul style="list-style-type: none"> • “The land is allocated for use as a public open space” and • “The erection of buildings thereon would constitute an undesirable intrusion in the landscape” <p>With this unspoiled area becoming such a unique and valued relaxation amenity for the residents of Nailsea the above two grounds for refusal must surely remain unchallengeable. There are few other locations within Nailsea that offer its residents ease of access to such freedom, attractiveness and tranquillity.’</p> <p>It is appreciated that the large section of woodland on the eastern end of the site is now removed from the plans and will be retained as woodlands.</p> <p>Many people had responded in the original consultation in the spring, detailing the impact on traffic on the very narrow roads in the area, and I will not repeat this. However, this area is of great value as a leisure area for local residents and should be retained as such.</p>
Rob Turvey		14724001//1	<p>I object most strongly to the development of the Uplands Open Space in Nailsea.</p>

Name	Organisation	Comment ID	Comment Received
			<p>In August 1976 a private application (1575/76) for similar development of 50 properties on the site was refused by the Council on the following grounds:</p> <ol style="list-style-type: none"> 1. The land is allocated for use as <i>a public open space.</i> 2. <i>The land is on a slope which forms part of the escarpment running between St. Mary's Grove and Bucklands Batch and is prominent in the landscape, and the erection of buildings thereon would constitute an undesirable intrusion in the landscape.</i> 3. The site is <i>outside</i> the area for which main drainage facilities have been provided. 4. <i>The site is served by only one access road with a restricted carriageway width, which is considered unsuitable for extensive residential development, and the increased traffic which would be generated through the existing small estate would be detrimental to the amenities and safety of the residents of this estate.</i> <p>Following rejection of the application the Council purchased the land for use as Public Open Space. It has been maintained in good order by the Council for that purpose ever since.</p> <p>Highway & Access implications:</p> <p>If, in 1976, the access was <i>unsuitable</i> for additional housing and the related traffic <i>detrimental to the amenities and safety of the residents</i>, this development would have significantly greater adverse impact today. 50 new properties will generate at least extra 200 vehicle movements a day (2 cars per family plus visitors, trades people and suppliers etc). Statistically there are more vehicles per household than in 1976, and vehicle widths have increased with the advent of the SUV, crossover cars and people carriers etc. This would mean even greater health, safety, hazard and amenity implications for the Uplands residents and the local area in general.</p> <p>The increased traffic would also have a wider knock-on effect within the St Mary's Grove area. St Mary's Grove Road is severely constricted in places, with sections having no, or very narrow, footpaths. Already, at morning and afternoon school pick-up times, there is severe congestion and dangerous parking arrangements all around the Hannah Moore and Grove schools. In particular; Whiteoak Way, Old Church Road, Church Lane, Morgan's Hill Close and Harptree Close are all</p>

Name	Organisation	Comment ID	Comment Received
			<p>adversely affected – exacerbated further when service vehicles and buses are trying to gain access.</p> <p>The Site Allocations Plan states that the “access is to be widened”. If this statement refers to the current service access to the Public Open Space such widening should not be achieved by reducing the widths of the adjacent footpaths. These are 1.8m wide which is 0.2 m less than the 2.00m min width specified in the ‘Highways Authority’s Design Compliance Guide’ and which provides for two wheelchairs to pass each other safely. Any less would clearly be an unacceptable lowering of safety standards</p> <p>If the proposed Uplands development is permitted and then added to by the vast sprawls of other developments proposed for Engine Lane, Netherton Wood Lane and Causeway View, the entire western half of Nailsea will be irreparably blighted with traffic, highway hazards, vehicle pollution and parking problems. This charming and peaceful section of Nailsea offers attractions to ramblers, cyclists and horse riders alike and will be lost forever.</p> <p><i>Amenity and Landscape Implications;</i></p> <p>The proposed Uplands site has been in use as Public Open Space for over 40 years with increasing numbers of Nailsea residents enjoying the unrestricted green spaces and wooded areas. Prior to the advent of North Somerset Council the predecessor Councils of Somerset, Avon & Woodspring, as well as Nailsea Town Council, were all of the view that the only appropriate use of the land was for Public Open Space. This is well documented within the Council’s Planning files and was a principle consideration in the Council’s 1976 decision.</p> <p>The area provides a most valuable leisure facility for its many users. Walkers, joggers, running clubs, dog walkers and dog trainers are seen enjoying it from early morning to late in the evening. Families roam and play safely with freedom from traffic concerns, dogs run loose of the lead in safety and all can enjoy the changing seasons, abundant bird-life and wonderful views towards Lulsgate and the Mendips. Grounds 1 and 2 of the 1976 planning refusal fully recognised these attributes by concluding;</p> <ol style="list-style-type: none"> 1. <i>“The land is allocated for use as a public open space”</i> and

Name	Organisation	Comment ID	Comment Recieved
			<p data-bbox="884 331 1433 434">2. <i>“The erection of buildings thereon would constitute an undesirable intrusion in the landscape”</i></p> <p data-bbox="711 472 1453 640">This unspoiled area has become a unique and valued amenity for Nailsea residents and the above two grounds for planning refusal remain unchallengeable. There are few other locations within Nailsea that offer residents such freedom, attractiveness and tranquillity.</p> <p data-bbox="711 678 951 712"><i>Need For Housing;</i></p> <p data-bbox="711 750 1453 1200">It is appreciated that North Somerset Council is under pressure to provide a significant number of new houses in its area, and I'm sure most of us fully understand that Nailsea must contribute its fair share. However, it would be regretful were the Council to seek to meet housing targets by simply sacrificing any conveniently available site. The Uplands Public Open Space would make the most minimal contribution to North Somerset’s housing obligations whilst its retention would continue to provide major benefits to the community that once lost cannot be replaced. I therefore trust that North Somerset Council, as owners and caretakers of this valuable resource for Nailsea residents, will understand this and ensure the site remains protected indefinitely.</p> <p data-bbox="711 1238 1062 1272"><i>Nature of Any Development;</i></p> <p data-bbox="711 1310 1453 1581">In the event that pressures on the Council to develop the site outweigh the above more esoteric considerations, it is recommended that the 50 homes will be of a similar low rise nature to those on the south-western boundary of the current Uplands estate. These were constructed to minimise intrusion on the landscape and any two story buildings on the site would provide an entirely incongruous and unsightly impact on the skyline.</p>
sue mcnaughton		14800577//1	<p data-bbox="711 1666 1445 1805">The Uplands Nailsea - Application to develop the land by the previous owner was rejected in the 1970s on the basis that the area is only suitable for Public Open Space. Following this decision Woodspring County Council purchased the land.</p> <p data-bbox="711 1843 1445 1982">Unfortunately for some reason the Council omitted to include this land in the allocation of Local Green Space. The woodlands and other trees in that area have tree preservations on them. The area is used extensively by dog walkers, people</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>jogging/exercising, meeting place and groups such as cubs/ brownies. The Uplands is a valuable community asset which should be preserved for the people of Nailsea.</p> <p>We strongly object to the development of this land which would cause intrusion of the landscape and change it for ever.</p> <p>Access to the site is by only one access with restricted width, increased traffic would be generated through the existing small road which could be dangerous to the residents of The Uplands. This will have a knock effect in St Mary's Grove as the road narrows in places which could cause concern. All the roads at this end of Nailsea are country roads/lanes which would not accommodate increased traffic flow.</p> <p>We appreciate the need for housing but it has to be in the right place not just pockets of land may be green belt could be used as your Councillors have already suggested.</p> <p>Other factors need to be taken into account such as employment, car parking in town car parks are already at saturation point.</p>
hlove		14811233//3	<p>The land South of The Uplands should not be developed. It is an enclosed small parcel of sloping land that is bordered by a protected area to the East and ringed by hedging and trees with preservation orders. It has one very narrow entrance/egress place that is too narrow to be used as awn access road. Widening it would be very expensive and likely to need some very protracted negotiation. There is a high-pressure water main that would need to be left free of housing in case of urgent repair. It is the reason that a footpath is in place between two properties on The Uplands.</p> <p>The land South of The Uplands is currently classed as Public Open Space and has been so for 40 years, extensively used by residents from the whole town of Nailsea. The minimum need is to class this small tract of land as Local Green Space, thereby fulfilling National Planning Policy Framework criteria points 73-77. This should be done openly and immediately, as it should have been during LGS consideration process in 2013.If this is not carried out, it begs the question of how open any consultation is considered, when it can be manipulated by</p>

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			<p>the public owners of environmental land for financial gain, at the expense of the local tax-payers and residents.</p> <p>It is reported that North Somerset has serious obesity health problems and that the North Somerset Care Commission are in "Special Measures" due to overspend. Removal of a free facility which supports both the mental and physical health of Nailsea residents is against the High Level Objective to "Improve Health & Wellbeing".</p>
Nailsea Action Group	Nailsea Action Group	14823809//7	<p>Although the number of houses proposed to be built on this site has been reduced since the plan's first issue, this land was deliberately barred from development when the The Uplands was originally developed in order to leave an attractive open space and to prevent the view from the south being spoiled by rooflines overtopping the escarpment. As with other areas of Nailsea, and mentioned elsewhere in this overall submission, public consultation was poorly publicised and in a venue that, though central to Nailsea, was cramped and added little to what was already in the public domain. As with other proposed development sites in Nailsea, road access is not good (also to be found in more detail elsewhere in this submission). The preferable alternative is to leave this open space as it is, it being a safe and much used area for families, children and dog owners for walking and recreation.</p>
s.lyon		14823841//1	<p>Regarding The Uplands Nailsea (refer to attachment)</p> <p>I am a resident of Nailsea of 21 years and regularly use the Open Space to exercise my dog and to connect with the network of footpaths</p> <p>I object to the sale and development of the land for the following reasons</p> <ul style="list-style-type: none"> • The acquisition of The Uplands Public Open Space by Woodspring CC was made as a direct result of the refusal of a planning application to build on the land in 1976 - reasons included that it was allocated for use as Public Open Space - The reasons for refusal still apply • In 2000 I communicated with the Council and the letter received in February of that year proves that it was regarded as Public Open Space

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			<ul style="list-style-type: none"> • The National Planning and Policy Framework document states that Open Space should not be developed unless certain criteria is met. Evidence of this has not been forthcoming • The Open Space is used extensively and it a valuable asset to the community and the cost of maintenance is low when considered alongside other options for recreation • Dog owners are able to exercise their dogs off the lead on the Open Space unlike other areas. Dog ownership is an important factor in supporting independent businesses in the town (pet shops, vets, dog groomers, dog walkers, boarding kennels) • Level access from the two entrances at the Uplands and ease of parking mean that it is accessible to all ages • A large part of Nailsea's appeal to new and existing residents is access to open space, - the town offers little else! (no seafront, marina, or swimming pool) • 50 houses is a small part of the total required for Nailsea and does not justify the corresponding loss of the Uplands • Its exclusion for consideration as LGS is not clear and it appears that proactive consultation on the issue has never been sought. It is as it is as important (if not more so) than other areas of Nailsea and is natural parkland that serves the residents at the West of the Town but also further afield. LGS status for The Uplands was recommended by Nailsea Action Group. • The preservation of The Uplands is supported by Dr Liam Fox MP <p>Attachments also include letters from 3 other Nailsea residents: Mr Norman Walker, Mrs Jean Walker and Mr R Lewis.</p>
Cliff Hannabuss		16128001//1	<p>We wish to object to the proposal to build 50 dwellings at The Uplands for the following reasons:-</p> <p>The land in question was designated a ‘Public Open Space’ (POS) by your predecessors. Among their reasons for doing so were,</p> <ol style="list-style-type: none"> 1. The erection of buildings thereon would constitute an undesirable intrusion in the landscape.

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			<p>1. The site is served by one access road with a restricted carriage way width which is considered unsuitable for extensive residential development and the increased traffic that would be generated through the existing small estate would be detrimental to the amenities and safety of the residents.</p> <p><i>What has changed since then? Nothing, except that vehicles have become more numerous, greater in size and weight and the road condition has deteriorated markedly. The increase in the number of properties proposed from that time presents even greater emphasis to the above objections.</i></p> <p>This area offers an adventure playground for children, domestic pets and residents alike and has remained untouched for more than 40 years. The POS is enjoyed by increasing numbers of residents of the whole of Nailsea and is used by joggers, horse riders, dog walkers and trainers and families, children can play safely, free from traffic dangers.</p> <p>The points we consider that now need to be addressed are:-</p> <p>Infrastructure and Residents Services</p> <ul style="list-style-type: none"> • the proposed increase in the total population of Nailsea by 3 – 4000 will place an intolerable strain on the existing roads, schools, town centre parking and medical services when that are already stretched beyond the ability to provide a service worthy of the name. It is already difficult to arrange suitable and prompt appointments in the medical centres. Parking in the town as also approaching capacity. The state of repair of the roads is appalling. • The area is poorly served by local transport services, encouraging the use of cars which is unsustainable, the proposed development will serve only to increase this form of transport and its attendant problems. • The new residents will not find employment in the Nailsea area, necessitating transport to commute to other locations for employment, thereby increasing rush hour movements in road, rail and bus transport. • Most routes into and out of the town are served by narrow, winding roads which are little more than country lanes, this will result in safety issues on the roads, causing bottlenecks at peak times. Adjacent areas such as Chelvey, Brockley, Backwell and

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			<p>Tickenham will be severely affected by any increase in traffic movements to access the A370 and the M5 .</p> <ul style="list-style-type: none"> Major developments such as this without any improvements in infrastructure will produce their own impact on surrounding areas. <p>Environment and landscape</p> <ul style="list-style-type: none"> Large developments will adversely affect the open rural character of the area The wildlife of the area will be lost forever, including also, loss of native trees, hedgerows and dry stone walls. <p>Recreation and Green Open Space</p> <ul style="list-style-type: none"> The lanes will no longer be safe for walkers, horse riders and cyclists The existing value as an amenity, of the open spaces already enjoyed by residents, domestic pets, visitors and children, will be lost and cannot ever be replaced. Over the last 40 years, most of the development within Nailsea has been devoid of open green space and now it is proposed to reduce that even further. The availability of the existing Grove Playing Field is gradually being reduced due to the activity of local sports clubs, as a result the POS to the south of The Uplands is even more valuable as a recreation resource. <p>North Somerset Council, with a duty to protect and preserve amenities for the existing population, must ensure that the criteria of residents services, such as medical facilities, roads, car parking, schools, leisure facilities and security, make for a desirable place in which to live are upheld.</p>
North Somerset Internal Drainage Board (Simon Bunn)		16130337//19	<p>Just outside of the Board's district but will drain into the Board's district.</p> <p>Significant drainage issues in downstream catchment, development should contribute to reducing existing flood risk.</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p>

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			<p>Development will be expected to contribute to reducing existing flood risk.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>

Section

Land at North West Nailsea

Name	Organisation	Comment ID	Comment Received
Linden Homes - Barton Willmore (G Tibbs)	Barton Willmore	10208289//1	<p>EXECUTIVE SUMMARY</p> <p>This report is prepared on behalf of Linden Ltd (Linden Homes Strategic Land) in response to the publication version of the North Somerset Sites and Policies Plan, Part 2, Site Allocations Plan consultation.</p> <p>It supports the allocation of land at North West Nailsea for development to help meet the need for new housing in North Somerset. This report presents further information on the Site and constraints which supports the suitability of the proposed allocation.</p> <p>It is identified how Linden could bring forward a first phase of development to deliver circa 195 homes and how this could fit into comprehensive development of the wider proposed allocation.</p> <p>1.0 INTRODUCTION</p> <p>1.1. This report is prepared on behalf of Linden Homes Strategic Land in response to the publication version of the emerging Sites and Policies Plan, Part 2, North Somerset Site Allocations Plan consultation.</p> <p>1.2. The purpose of the Site Allocations Plan is not to identify the scale or distribution of housing proposed within North Somerset (that is the role of the Core Strategy), but to identify detailed allocations to meet the growth planned for in the Core Strategy housing requirement. Within that context, this report supports the suitability of Land at North West Nailsea as a proposed allocation for housing development to help provide the homes planned in Nailsea.</p> <p><u>Contents</u></p> <p>1.3. This report comprises the following sections:</p> <p>Section 2 provides comment in respect of Policy SA1 (Schedule 1) and information in support of North West Nailsea as a suitable location for residential development.</p> <p>Section 3 provides commentary on the sustainability appraisal assessment of North West Nailsea.</p>

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			<p>Section 4 explains how Linden Homes intend to bring forward a first phase of circa 195 homes.</p> <p>Section 5 provides conclusions and outlines key advantages of North West Nailsea.</p> <p><u>Supporting Documents</u></p> <p>1.4. This report is accompanied by the following documents:</p> <ul style="list-style-type: none"> • An initial concept illustrative masterplan prepared by Keep Architects showing how the first phase could be brought forward in the context of the wider proposed allocation which is attached as Appendix 1. • An ecological constraints and opportunities plan prepared by Ecosulis is attached as Appendix 2. • An initial transport note prepared by Vectos is attached as Appendix 3. • An initial flood risk note prepared by Vectos is attached as Appendix 4. • A drawing from National Grid’s DCO application showing the approved rerouting and undergrounding of power lines is attached as Appendix 5. <p>2.0 SUITABILITY OF THE PROPOSED ALLOCATION FOR DEVELOPMENT</p> <p>2.1 This section provides commentary upon the principal considerations relevant to development of the North West Nailsea site, following input from Linden Homes’ consultant team.</p> <p>2.2 Policy SA1, of the publication version of the Site Allocation Plan relates to housing allocations. The Policy references a Policies Map and Schedule 1 that lists the housing allocations. North West Nailsea features on the proposals map and is listed at Schedule 1. The schedule states that the Site has capacity for 450 dwellings and provides site specific notes. These are reproduced below:</p> <ul style="list-style-type: none"> • Capacity of 450 dwellings considered a maximum; • Spine Road running through site (from Pound Lane to Watery Lane) required; • Pylons to be removed Undergrounding of 132kv line on northern boundary; • Transport Assessment required; • New Primary School to be included as part of development; • Relocation or replacement of Fryth Way sports pitch;

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			<ul style="list-style-type: none"> • Where possible retention of Tree Preservation Order trees; • Retention of strong hedge boundaries especially to the north; • PROW links to Causeway View; • Coal Mining Risk Assessment required; • Housing mix to meet local needs; • Protection of adjacent Tickenham, Nailsea and Kenn Moor Site of Special Scientific Interest; • Consideration of fact that site is within 5km consultation zone for Bats SAC. <p>2.3 This section and the attached technical notes respond to those concerns by providing more detailed assessment of constraints. This section concludes by outlining how development of the proposed allocation can meet the site specific details/ notes outlined in schedule 1 of the draft Site Allocations Plan and by addressing other physical constraints. In the following section, this work is then used to comment upon the assessment of the proposed allocation within Appendix 1 residential site assessments of the Sustainability Appraisal.</p> <p><u>Ecology and vegetation</u></p> <p>2.4 The North West Nailsea proposed allocation comprises improved grassland and arable fields, which appear to be well-managed and as a result provide limited ecological value. Boundary habitats appear to support mature trees and hedgerows, however central field boundary hedgerows appear to be predominately regularly managed. A watercourse (Parish Brook) is present on the western boundary of the proposed allocation. The watercourse is relatively over shaded with very low flow, and supports below average water quality. Opportunities for nesting birds, reptiles, otters, badgers and bats are present on the proposed allocation. Consideration for these species should be made when bringing forward planning applications, and further ecological survey works are likely to be required to inform planning applications.</p> <p>2.5 The Tickenham, Nailsea and Kenn Moor Site of Special Scientific Interest is designated for species associated with drainage ditches and rhynes. The Parish Brook watercourse on the western boundary of the proposed allocation forms part of the SSSI and may support similar species. On this basis, the watercourse and an appropriate buffer should be retained within the proposed allocation to minimise any impacts on the SSSI.</p>

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			<p>2.6 In consideration of the fact that the proposed allocation is within the 10km consultation zone for a bat SAC, bat surveys should be undertaken. The ecological opportunities and constraints plan (see below) takes into account the suitable foraging and commuting habitats on the proposed allocation and these have been highlighted in red indicating high ecological value. Dark corridors should where possible also be retained for light sensitive species, such as horseshoe bats.</p> <p>2.7 A constraints and opportunities plan has been compiled which shows areas likely to have low ecological value (highlighted in green), medium (orange) and high ecological value (red) (see Appendix 2). This indicates that the proposed allocation supports large areas with likely low ecological value, based on the intensive management of the land. On this basis, the proposed allocation can support residential development with appropriate habitat retention (particularly boundary habitats), mitigation such as sensitive lighting schemes, and additional planting. As a result, there is opportunity for development to provide an ecological enhancement through appropriate design.</p> <p>Where possible, hedgerows and the watercourse should be retained and protected within the scheme with no residential gardens backing onto these areas, and a suggested 5m buffer along important hedgerows and a 9-10m buffer along the watercourse is shown on the plan.</p> <p><u>Transport</u></p> <p>2.8 A transport note prepared by Vectos is enclosed as Appendix 3. The Vectos report shows how safe and suitable vehicular and pedestrian access to the proposed allocation could be achieved. The report demonstrates the high levels of accessibility from the proposed allocation to facilities and services within Nailsea on foot or by bicycle. It also shows that the proposed allocation is well located to benefit from bus and rail public transport links. This work reinforces the suitability of the proposed allocation as a location for sustainable growth at Nailsea.</p> <p><u>Pylons</u></p> <p>2.9 There is now consent for the rerouting and undergrounding of the powerlines which cross the proposed allocation, with a Development Consent Order for the Hinkley Point C Connection Project having been made on 19th January 2016. Works under the Development Consent Order will remove the existing overhead lines and underground/relocate them outside of the proposed allocation. The approved drawing</p>

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			<p>from National Grid's application for a DCO is enclosed as Appendix 5.</p> <p>2.10 The initial concept illustrative masterplan at Appendix 1 shows how the undergrounded line that will cross part of the proposal allocation could be accommodated within public open space and a landscape buffer.</p> <p><u>Flooding and Drainage</u></p> <p>2.11 The Vectos flood risk and drainage note (enclosed as Appendix 4) shows that the majority of the proposed allocation is within flood zone 1, in which residential development is an appropriate use. The Vectos work provides an understanding of flood risk and drainage together with initial concepts for how surface water drainage could be provided within the proposed allocation. The Vectos work concludes that flood risk and drainage are not constraints to the delivery of the proposed allocation.</p> <p><u>New Primary School</u></p> <p>2.12 Schedule 1 lists a new Primary School in the Site Specific Details/Notes column. North West Nailsea was a draft housing allocation for 450 dwellings in previous consultation drafts of the emerging Plan and in the March 2016 consultation draft of the Plan. The Consultation Draft did not propose a new Primary School as part of the allocation. This publication version is the first suggestion of a new Primary School at NW Nailsea. From looking at the evidence base it is not clear where the justification for a new Primary School on the Site has arisen. The need for additional primary education capacity is to be considered, including the possibility of a new school on site. Linden Homes would like to discuss this further with North Somerset Council to understand the need, funding and discuss suitability of location.</p> <p>2.13 By comparison, the sustainability appraisal assessing each of the allocations and omission sites, states for all sites in Nailsea that there are Primary Schools within the settlement with capacity or ability to expand. Replacement of Fryth Way Sports Pitch</p> <p>2.14 Linden Homes has commenced positive discussions with landowners in Nailsea to secure an alternative, suitable Site in the vicinity of the Site, for the relocation of the sports pitch.</p> <p><u>Landscape</u></p> <p>2.15 We have had sight of a document entitled 'North West Nailsea Preliminary Landscape Appraisal' prepared on behalf of Gleeson Developments Ltd who are promoting an omission site</p>

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			<p>within the strategic gap to the south of Nailsea proposed in the Plan.</p> <p>2.16 The Gleeson document acknowledges that:</p> <p><i>“In terms of its intrinsic landscape character, the site [the North West Nailsea proposed allocation] is relatively unconstrained as it should be possible to achieve new residential and employment development within the landscape framework provided by existing hedgerows and tree lines. Moreover, the site is gently sloping and there are no other important landscape features which would need to be conserved.”</i></p> <p>2.17 It acknowledges that</p> <p><i>“in visual terms, the site comprises an undistinguished but pleasant tract of countryside. However, its visual character is affected by the presence of the largely unscreened urban edge on its east boundary and the two overhead ETLs [electricity lines]”.</i></p> <p>2.18 However, the report states that due to visual amenity and “certain other factors ” the capacity of the proposed allocation may be more limited than anticipated. In relation to visual amenity, the report argues that the development would be visually prominent from the adjacent moor, although it acknowledges that this can be mitigated by a broad landscape buffer. Limited detail is provided as to which visual receptors would be expected to experience the alleged adverse visual impacts. Reference is made to the SSSI, but this is an ecology designation, not a landscape designation or visual receptor.</p> <p>2.19 In relation to the prominence of the proposal allocation, the report notes that the high point of the land is just 13 AOD and the level change across the proposed allocation is only 7m. The proposed allocation is low lying and relatively flat. Furthermore, there is no acknowledgement of the potential for development, through new planting, to improve the existing unscreened urban edge, which is noted as a visual detractor.</p> <p>2.20 Overall, the Gleeson report provides only a vague and unsubstantiated explanation as to why visual amenity is considered to constrain the potential of the proposed allocation to accommodate new homes. Instead, the remainder of the Gleeson ‘Landscape Appraisal’ addresses its principal focus: the implications of undergrounded power lines for development capacity. As identified above, and as is acknowledged in the Gleeson work, the relocating and undergrounding of the power</p>

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			<p>lines is now consented. Furthermore, as is also identified above, and contrary to Gleeson’s landscape consultant’s assertion, an easement for the undergrounded lines can be accommodated into a masterplan for the proposed allocation without compromising the number of homes that can be provided.</p> <p>2.21 Overall, the Gleeson work does not provide a convincing explanation as to why landscape or other considerations should prevent the proposed allocation from being carried forward into the publication version of the plan.</p> <p><u>Housing Mix</u></p> <p>2.22 It is recognised that there is an aspiration in Nailsea for new housing development to comprise of a range of housing types. This is encouraged by the Town Council and set out in Policy DM35 of the Sites and Policies Plan. The development of the Site can deliver a higher proportion of smaller dwellings to help to redress the age structure imbalance that exists in the town.</p> <p><u>Site Specific Details/Notes</u></p> <p>2.23 The work undertaken to date shows how the proposed allocation could be developed to meet the requirements proposed in the details/notes to Schedule 1 of the draft Site Allocations Plan. This is shown in the table below.</p> <p>See table in attached report.</p> <p>3.0 SUSTAINABILITY APPRAISAL</p> <p>3.1 This section responds to the assessment of North West Nailsea (site ref. HE1438) within Appendix 1 of the Site Allocations Plan Sustainability Appraisal. In the table below we provide further information to identify how each of the amber and red classification within the sustainability matrix can be mitigated (Please note the Appendix does not contain criteria numbered 3).</p> <p>See table in attached report.</p> <p>3.2 The Sustainability Appraisal assessment of residential sites also assesses a number of omission sites that are not proposed for allocation within the draft plan. Those sites include HE14126 Youngwood Farm, HE14163 Land west of the Rugby Club, NS0075 Land at South West Nailsea, NS0077 Land at West End Lane, and HE14368 Land north of West End. We support the Council’s decision not to advance these sites as proposed allocations.</p>

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			<p>3.3 We consider that the site at Youngwood Farm, in particular, is poorly integrated with the existing settlement and would result in harm to the local landscape. Similarly, land at south west Nailsea (Battens Farm) would be detached from the existing settlement. Both Youngwood Lane and Land at south west Nailsea are far from the town centre services and facilities.</p> <p>3.4 Land at North West Nailsea benefits from better accessibility and is a more logical extension to the town than the omission sites.</p> <p>4.0 DELIVERABILITY – PHASE 1</p> <p>4.1 The initial concept illustrative masterplan at Appendix 1 shows how a first phase of the proposed allocation could be brought forward to deliver circa 195 homes together with public open space. The first phase would be accessed from The Causeway or Watery Lane. The development of the first phase would not prejudice delivery of the remainder of the allocation.</p> <p>4.2 The development of phase 1 could take place in step with National Grid’s work to relocate the power lines as part of the Hinkley Point C Connection project. An announcement is anticipated in January 2017 detailing a programme for the relocation.</p> <p>4.3 Linden Homes has assembled a consultant team, made initial contact with the Town Council and has commenced the technical work necessary to underpin a future planning application.</p> <p>4.4 Phase 1 is deliverable in the short term and the concept masterplan illustrates how it could fit into comprehensive development of the wider proposed allocation within the plan period.</p> <p>5.0 CONCLUSIONS AND KEY ADVANTAGES OF NORTH WEST NAILSEA</p> <p>5.1 North West Nailsea site has considerable planning history, having previously been allocated for residential development in the Clevedon, Nailsea and Portishead Local Plan (1992) and in the Woodspring Local Plan and then the North Somerset Local Plan (2000). It remains a suitable and sustainable location for the delivery of new homes at Nailsea. It is a prime Site for an allocation and has a number of key advantages:</p>

Name	Organisation	Comment ID	Comment Received
			<ul style="list-style-type: none"> • The technical work undertaken for these representations show that the proposed allocation is suitable, available and achievable as constraints can be overcome. • The proposed allocation would provide high levels of accessibility to existing services and facilities in Nailsea and public transport links. In particular, there is an opportunity for development to integrate well with Causeway View and surrounding pedestrian and bicycle routes. • Sensitive design could provide ecology enhancement and an appropriate landscape buffer. • National Grid now has consent to reroute and underground the overhead lines that cross the proposed allocation. • Delivery can commence with a first phase of 195 dwellings, accessed from The Causeway/Watery Lane at the western end of the proposed allocation. Linden homes has assembled a consultant team and is undertaking technical work to support a planning application for that phase. • Development of the Site will provide extensive economic benefits to the area in terms of the new homes bonus, jobs in construction and local expenditure generated through the purchase of goods and services. <p>5.2 In summary, the proposed allocation is suitable and preferable to the omission sites. We would be grateful if North Somerset Council could keep us informed of next stages of the Site Allocations Plan in particular the examination. Linden Homes would be pleased to work with the Council to discuss how delivery can proceed and will be submitting a formal request for pre-application advice in due course.</p>
Nailsea Action Group	Nailsea Action Group	14823809//8	see attached.
Natural England (Charles Routh)	Natural England	15687777//2	<p>We have specific concerns about this site, as it relates to the Tickenham, Nailsea and Kenn Moors SSSI. As we understand it, this SSSI is being affected by hydrological and water quality impacts from Nailsea. Developing this site would have two potential issues. First, it may exacerbate the existing hydrological and water quality issues on the SSSI. Secondly developing the site may preclude using some of this land for addressing the current hydrological and water quality issues. Whilst we would</p>

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			<p>hope that an accommodation could be reached such that the land could be developed, and both these issues addressed, it is not clear from the evidence supplied as part of this plan, that both these issues could be addressed and the full quanta delivered. Thus we advise that the inclusion of a fixed quanta of 450 would render the plan unsound, in that is not justified by the evidence supplied as part of this plan, and contrary to NPPF para 118. Proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted.</p> <p>Again, we would welcome discussions to establish whether there are ways of demonstrating that this policy could be delivered without adverse effect, or what modifications to the policy might be required to render it sound.</p> <p>Habitats Regulations Assessment (HRA) We await the full Habitats Regulation Assessment for this plan.</p> <p>Other comments We found the Map rather confusing. It does not show environmental constraints as per the adopted plan map, which makes cross referencing hard.</p>
North Somerset Internal Drainage Board (Simon Bunn)		16130337//20	<p>Just outside of the Board's district but will drain into the Board's district.</p> <p>Significant drainage issues in downstream catchment, development should contribute to reducing existing flood risk.</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>Development will be expected to contribute to reducing existing flood risk.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>
Cadplan		3897665//3	<p>This site is unsuitable site for housing;</p> <p>- It is very prone to flooding due to the low lying land, any development would only exacerbate the situation as there would be less surface area to absorb run off, other areas may see an</p>

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			<p>increase in flood risk as a result. I would be worried if I was the owner of Causeway House.</p> <ul style="list-style-type: none"> - Impact on the openness of the Green Belt & Area of&nbsp;SSSI. - Urbanisation of Green Belt countryside and urban sprawl towards Tickenham Church & farm complex. - Undesirable effect on the character of the area. -Unsuitable road network, out commuting would lead to increased traffic on Causeway View and The Causeway (already suffers from unsuitable traffic movements). -Most vehicles would use Pound Lane so leading to or near to the existing junction which already very busy, it is also used by all three emergency services so at the least a new roundabout would be need. Commuting cars would only have two routes into Bristol, either through Wraxall a route which includes narrow sections of highway without pavements and past Wraxall School, and through Failand which would involve yet more traffic movements up Stone Edge Batch and the notorious junction. Bear in mind also that outline planning consent has been given for 32 homes at the former Tickenham Garden centre and the out commuting vehicles would also use the Stone Edge Batch junction so compounding the hazardous nature of the junction. -Please contact Highways, Avon & Somerset Police, Nailsea Town Council, and the ambulance service for incident reports re the junction. - No new homes should be built near high voltage electricity pylons. - The site is very likely wetland so may be unsuitable for normal foundations.

Section

Total for Nailsea

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Environment Agency	Environment Agency	1020673//13	<p>Currently a significant volume of surface water from Nailsea discharges to the Tickenham Moor from a large pipe on the Causeway to the north west of Nailsea. The discharged water is contaminated with urban pollutants which have the potential to have a detrimental effect on the SSSI on the moor.</p> <p>The consultation plan showing ‘Sites Assessed for Residential Potential’ shows there are a number on the western side of Nailsea, all of which would add additional volumes of contaminated surface water run off to Tickenham Moor.</p> <p>If new development becomes acceptable, it would be environmentally beneficial for the surface water runoff from this side of Nailsea to be passed through some form of treatment prior to it discharging to the moor. The method by which it is treated would need to be decided in consultation with Natural England, but could take the form of a settlement pond or reed bed, both of which are visually non-intrusive and could be incorporated into the design of the new residential areas prior to them being built.</p>
Environment Agency	Environment Agency	1020673//4	<p>Nailsea</p> <p>We are potentially seeking financial contributions for managing the Land Yeo downstream of Jacklands Bridge to Church Lane Tickenham. Developments in Nailsea will potentially increase runoff into the Land Yeo putting additional pressure on this length of watercourse.</p>
Environment Agency	Environment Agency	1020673//8	<p>Nailsea/Backwell</p> <p>We are particularly concerned about this strategic location and the risk of impacts on the Tickenham, Nailsea and Kenn Moor SSSI here. The site is already negatively impacted by water quality and hydrological issues from existing development and road run off. Further development and the new J20 link road proposed in the Joint Transport Vision, which appears to cut through or alongside the SSSI, would be likely to worsen the</p>

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			<p>existing issues and be detrimental to the SSSI and the condition of the rhynes here. Creation of SUDS, reed beds and a lagoon may all be necessary here to mitigate new development impacts and avoid adding to the existing issues impacting the SSSI here. Impacts on fish passage at this location if new roads and development were crossing or adjacent to ditches and the Land Yeo, would need to be considered.</p>
Naigalseye		14647553//4	<p>The western edges of Nailsea are rich in ecological diversity. Because bats are a protected species, account has been taken of their common flight pathways, though it is unlikely that developers will be sufficiently moved to ensure that these are exactly retained or duplicated when the building is completed and very unlikely as the building takes place. There are many creatures now living in the fields to the west, north-west and south-west of Nailsea that are often seen now that were rarely so forty years ago. Large birds of prey such as buzzards, and smaller such as owls, sparrow hawks and kestrels which were rare, testify to the abundance of their natural prey, mammalian or avian. As well as an apparent increase in the area of the more common garden birds, it is now not so unusual to see gold finches and goldcrests, woodpeckers and nuthatches. Egrets now dwell on the levels to the north-west of Nailsea. Building over their natural habitats will destroy them and cause their inhabitants to decline or move away completely with the knock-on effect of general ecological and environmental impoverishment at a time when we are constantly being exhorted to value our natural environments, whether they are officially protected or not.</p>
hlove		14811233//1	<p>Proposed Residential Sites should be such that people want to live there healthily and safely, respecting their environment and looking after it. Proposals on the SW of Nailsea would not achieve this and are counter to both National Planning Policy Framework, in particular Points 73-77 and NSC stated 'High Level Objectives': 1.1, 4.2/3/4/8 and 5.4</p> <p>Accessibility: Nailsea, when viewed on a map is like a blister, with very small feeder roads in every direction. Like most blisters, if allowed to expand unchecked or unrelieved, it will burst with serious consequences to the people living there. (this analogy is given by a senior Planning Inspector from outside</p>

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			<p>the area) Proposed Residential Sites: West End, West of Engine Lane, South of The Uplands - all around the SW of Nailsea (some already with Planning Applications in process) are a particular example of this, Most residents of new housing in this corner would commute into Bristol due to negligible employment opportunities in Nailsea. The nearest main road for commuting is the A370, accessible only by using very narrow country roads: Netherton Wood Lane/Chelvey village, in many places single track with passing places. Past traffic accident figures are no measure of future potential risk. With increased traffic comes increased risk.</p> <p>Of particular concern for additional reason, is the proposal for housing South of The Uplands. This land is an enclosed small parcel of sloping land that is bordered by a protected area to the East and ringed by hedging and trees with preservation orders. It has one very narrow entrance/egress place that is too narrow to be used as a road. Widening it would be very expensive and likely to need some very protracted negotiation. There is a high-pressure water main under the land that would need to be left free of housing in case of urgent repair. It is the reason that a footpath is in place between two properties on The Uplands.</p> <p>The land South of The Uplands is currently classed as Public Open Space and has been so for 40 years, extensively used by residents from the whole town of Nailsea. The minimum need is to class this small tract of land as Local Green Space, thereby fulfilling National Planning Policy Framework criteria points 73-77. This should be done openly and immediately, as it should have been during LGS consideration process in 2013. If this is not carried out, it begs the question of how open any consultation is considered, when it can be manipulated by the public owners of environmental land for financial gain, at the expense of the local tax-payers and residents.</p> <p>It is reported that North Somerset has serious obesity health problems and that the North Somerset Care Commission is in 'Special Measures' due to overspend. Removal of a free-to-use facility which supports both the mental and physical health of Nailsea residents is against the High Level Objective to "Improve Health & Wellbeing" and does nothing to help overspend on health.</p>
Mr Marlow		14814785//1	<p>I wish to object to the sites selected for Nailsea through the Site Allocations Plan on the basis that in respect of Nailsea, the plan does not meet the “4 tests of soundness”.</p>

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			<p>In particular, I would like to raise the following objections:</p> <ul style="list-style-type: none"> • The level of community engagement was not sufficient for a consultation of this level of impact. Little effort was made to ensure residents of the town were aware of the proposals. The public engagement event in Nailsea library was not effective, because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. • Sites appear to have been selected without having assessed infrastructure, traffic and environmental impacts, despite the fact that the sites in the West of Nailsea are remote from amenities and surrounded by narrow country lanes with a number of difficult/dangerous junctions and constrictions. • The sites to the West of Nailsea in particular, do not meet the requirements for sustainable development for the following reasons: <ul style="list-style-type: none"> ◦ Distances from amenities such as shops, health and leisure facilities' are such that car use will prevail and the town centre car parks are already congested and over capacity. ◦ There is little likelihood of the majority of residents of the proposed developments finding employment in Nailsea and they will therefore need to commute predominately to Bristol adding to congestion between Nailsea and the city. ◦ Lack of capacity on rail services and rail station car parking will also exacerbate the current problems of commuting by rail. ◦ The use of grade 2 agricultural land (West of Engine Lane site) and greenfield sites in general should be discouraged. ◦ Loss of a highly valued landscape added to which any development of this area would spoil the vista from the south and east of the town which is currently low key and relatively unobtrusive. ◦ Negative impact on ecology, including bats (West of Engine Lane site) and loss of established trees. ◦ There is no suitable access to The Uplands site at present and the only option being to forming one via The Uplands itself which is currently a quiet residential street with poor junctions onto adjoining roads. The

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			<p>development here would be to the significant detriment to existing residents and increase risk of accidents at the junctions.</p> <ul style="list-style-type: none"> ◦ Loss of much valued and used recreational open spaces (West of Engine Land and The Uplands). The Uplands area being one of the few reasonably flat open public spaces to the south/east of the town is much used by older people for exercise and dog walking and by children for ball games etc. <p>In summary I do not believe that Nailsea in general and the west end of the town in particular is suitable for significant, sustainable development and I urge that the current proposals be reconsidered.</p>
Nailsea Action Group	Nailsea Action Group	14823809//4	<p>The evidence for the need for the people of Nailsea to build houses on greenfield sites on the western edge of Nailsea is not proved, and therefore neither robust nor credible. Other options such as the Taverner site and the old cider works have been too readily dismissed as too difficult. The impact of increased traffic as a result of developing this area of land especially when coupled with other areas nearby in which builders are interested, has been underestimated, and this view is corroborated by the work of a local residents' group which has carried out its own traffic surveys using Highways Department methods and algorithms. The thought that has been given to this part of the plan is not consistent with achieving sustainable development.</p>
Mr and Mrs Marks		16017345//1	<p>Yes, we do need more houses in this country, but Nailsea is not the place for them.</p> <p>Where are all these new people going to work? Bristol? Weston? Clevedon? Certainly not many in Nailsea.</p> <p>How are they going to travel? By train? The car park is already full. Mostly by car. What decent roads are there? None, just B roads and country lanes which have not changed in 70+ years.</p> <p>Why hurry to make decisions before setting in place adequate roads, car parks, doctors, etc. The INFRASTRUCTURE must be addressed before any houses are built.</p>

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			At present the areas in Nailsea are completely unsuitable in so many ways.
Roger Eade		16064769//1	<p>Yes, Nailsea needs more appropriate housing but it also has to be realistic on numbers and location. The town is currently skewed with existing dwellings mainly to the south and west of the town. Further developments here would only exacerbate the situation possibly even leading to a “subtown” with no benefit to the main town centre. Logically, we should look to the north of the town for development. But, this is green belt. However, it would be sensible to reallocate green belt space to the strategic gap between Nailsea & Backwell to preserve said separation. This would then free land to the north for development and be nearer a proposed M5/A370 link road (in the Atkins report 2005) which would track the route of the B3130 and also serve the industrial units on that side of town.</p> <p>Current proposals for the Youngwood Lane area of Nailsea are inappropriate.</p> <p>Looking at the wider picture, where will most people be working? Answer Bristol or Weston. So why not reduce the size of Nailsea’s housing allocation and construct more there. For example, Ashton Vale with its new southern link road, park and ride etc. has infrastructure in place to facilitate easy and reduced travel to work rather than that from what will be dormitory towns.</p>
Trefor and Jill Evans	-	16091585//1	<p>I wish to object to the sites selected for Nailsea through the Site Allocations Plan on the basis that in respect of Nailsea, the plan does not meet the "4 tests of soundness".</p> <p>In particular, I would like to raise the following objections:</p> <ol style="list-style-type: none"> 1. Poor public engagement opportunities 2. The N Somerset website to access the local plans was not easy to find and therefore the quality of responses will be compromised. 3. Community engagement was not sufficient for a consultation nor was it adequately publicised well and the layout of the venue did not allow easy viewing of the plans.

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			<p>4. With reference to the transport strategy, there is little evidence of a strategy to link many of the proposed sites to public transport hubs. For the area around Nailsea and Backwell the new roads, improved parking at the station and the proposed Metro route is not supported by the location of the new sites.</p> <p>5. Why are so many of the proposed housing areas are not located close to employment hubs e.g. Bristol and Bristol Airport?</p> <p>6. Many sites appear to be selected without having assessed infrastructure, traffic and environmental impacts</p> <p>7. The sites to the West of Nailsea, in particular Battens Farm linking Nailsea to West End, do not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and rail stations • Lack of capacity on rail services and rail station car parking • The use of grade 2 agricultural land (West of Engine Lane site) • Loss of highly valued landscape • Negative impact on ecology, including bats (West of Engine Lane site) • Loss of recreational open space (West of Engine Lane and the Uplands) • Lack of new employment • Environmental and traffic impact.
Oliver Evans	-	16094561//1	<p>I wish to object to the sites selected for Nailsea through the Site Allocations Plan on the basis that in respect of Nailsea, the plan does not meet the "4 tests of soundness".</p> <p>In particular, I would like to raise the following objections:</p> <ol style="list-style-type: none"> 1. Poor public engagement opportunities 2. The N Somerset website to access the local plans was not easy to find and therefore the quality of responses will be compromised. 3. Community engagement was not sufficient for a consultation nor was it adequately publicised well and the layout of the venue did not allow easy viewing of the plans.

Name	Organisation	Comment ID	Comment Recieved
			<p>4. With reference to the transport strategy, there is little evidence of a strategy to link many of the proposed sites to public transport hubs. For the area around Nailsea and Backwell the new roads, improved parking at the station and the proposed Metro route is not supported by the location of the new sites.</p> <p>5. Why are so many of the proposed housing areas are not located close to employment hubs e.g. Bristol and Bristol Airport?</p> <p>6. Many sites appear to be selected without having assessed infrastructure, traffic and environmental impacts</p> <p>7. The sites to the West of Nailsea, in particular Battens Farm linking Nailsea to West End, do not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and rail stations • Lack of capacity on rail services and rail station car parking • The use of grade 2 agricultural land (West of Engine Lane site) • Loss of highly valued landscape • Negative impact on ecology, including bats (West of Engine Lane site) • Loss of recreational open space (West of Engine Lane and the Uplands) • Lack of new employment • Environmental and traffic impact.
R W Morgan		16111521//1	<p>I wish to object to the sites in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>environmental impacts, despite the fact that the sites in the west of Nailsea (particularly west of Engine Lane)are remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking; • The use of grade 2 agricultural land (west of Engine lane); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats (west of Engine Lane) • Loss of recreational open space, (west of Engine Lane and the Uplands)
Martin Webster		16111745//1	<p>I wish to object to the sites in Nailsea, currently selected in the Site Allocations Plan on the basis that in respect of this site, the plan does not meet the '4 tests of soundness'.</p> <p>In particular, I would like to raise the following objections:</p> <p>1) The level of community engagement in Nailsea by NSC was not sufficient for a consultation of this level of impact. The public engagement event in Nailsea library was not effective because it was not publicised well and the layout at the venue did not allow easy viewing of the plans. The consultation website was confusing and made objecting difficult.</p> <p>2) The site has been selected without having assessed infrastructure, traffic impacts on road/junction capacity and environmental impacts, despite the fact that the sites in West Nailsea (in particularly west of Engine Lane) are , remote from amenities and surrounded by narrow country lanes.</p> <p>3) The site does not meet the requirements for sustainable development for the following reasons:</p> <ul style="list-style-type: none"> • Distance from amenities, bus stops and railway station; • Lack of capacity on rail services and the railway station car and cycle parking;

Name	Organisation	Comment ID	Comment Recieved
			<ul style="list-style-type: none"> • The use of grade 2 agricultural land (highest grade in the area); • Loss of highly valued landscape as identified by the Core Strategy; • Negative impact on ecology, including bats' foraging route; • Loss of recreational open space,
Highways Agency (S Walsh)		8141345//7	<p><u>Nailsea</u></p> <p>Nailsea is identified as having a proposed capacity of 815 dwellings, 1.5 hectares for proposed employment sites and 15.8 hectares for safeguarded employment sites. Out of the proposed seven locations for dwellings only one site (Sycamore House) has full planning consent for 30 dwellings whereas the remaining six locations have no planning consent at present.</p> <p>The traffic from these developments could impact on Junction 20 of the M5. An appropriate evidence base must be submitted with any forthcoming application to support proposals which considers the development proposed as a quantum.</p>

Section**Severn Paper Mill**

Name	Organisation	Comment ID	Comment Recieved
Environment Agency	Environment Agency	1020673//11	Portishead Old Mill Road and Severn Paper Mill, Marine View These sites present opportunities for enhancing the river corridor for both riverine biodiversity and water based recreation.

Section

South west of Severn Paper Mill

Name	Organisation	Comment ID	Comment Recieved
Taylor Wimpey		14828865//1	<p>Alder King Planning Consultants have been instructed by our clients, Taylor Wimpey UK Limited, to make representations to the consultation on the Site Allocations Plan December 2016. This representation is made in the interest of promoting the remnant land at the former Severn Paper Mill for residential allocation.</p> <p>The Site Allocations Plan is being prepared by North Somerset to allocate land for development to help deliver the key policies set out in the North Somerset Core Strategy. This includes identifying land to meet the housing need within North Somerset, as well as employment, environmental protection, leisure and community uses.</p> <p>These representations relate to the land at the former Severn Paper Mill (the site), a location plan of which is appended to this letter. The site comprises a vacant brownfield site, which is situated to the north east of Portishead. The site was formerly the Severn Paper Mill and was last occupied by AP Burt & Sons Ltd for the production of paper and polythene bags. In total the site measures some 1.7 hectares (4.2 acres).</p> <p>The boundaries of the site are set to the east by the Ashlands residential development; to the south by an industrial area; and the Portbury Linear Park to the north west. To the north of the site is further land which was part of the former Severn Paper Mill. Taylor Wimpey is in the process of constructing 117 dwellings on this land pursuant to a Reserved Matters approval granted in January 2015 (14/P/1186/RM).</p> <p>The site currently has an employment allocation under saved policy E/5 of the North Somerset Replacement Local Plan (2007) which is unviable. An outline permission for employment use was granted in 2013, which is set to expire this month. The site has been marketed for in excess of two years and no employment redevelopment proposals have been forthcoming. Taylor Wimpey has therefore been pursuing a residential redevelopment allocation. Representations were made to the Call for Sites in March 2015 and the Site Allocations Plan in March 2016. A marketing report was made available as part of this process.</p> <p>The site has since been identified in the Site Allocations Plan consultation document as a residential allocation for 70 dwellings, which is wholly supported. The consultation document is</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>accompanied by a Sustainability Appraisal. This provides an assessment of the site which concludes it is a sustainable allocation for residential use, which will result in the redevelopment of previously developed land.</p> <p>In addition to the above, the site has further merits such as it being sustainably located within the urban settlement, where the principle is established for residential development. The site itself is in an accessible location, in close proximity to the town centre (800m), and it is close to the proposed train station. The site is well related to the local facilities and services that will be supported by the residents of the proposal. The site is well positioned adjacent to phase 1 of the development and will be well integrated into the surroundings as a continuation of this scheme.</p> <p>As you may be aware, Taylor Wimpey instructed Alder King to submit a full application for residential development on the site. The application was submitted in June 2016 and is currently pending with the Council, subject to resolution of detailed matters. The reference for this application is 16/P/1608/F. It is expected that the application will be presented to Planning Committee early in 2017 with an officer recommendation for approval.</p> <p>For all the above reasons, the site is in a sustainable and appropriate location for residential development, and the draft residential allocation should be carried through to adoption.</p>

Section

Old Mill Road*

Name	Organisation	Comment ID	Comment Received
Environment Agency	Environment Agency	1020673//10	<p>Portishead Old Mill Road and Severn Paper Mill, Marine View</p> <p>These sites present opportunities for enhancing the river corridor for both riverine biodiversity and water based recreation.</p>
manager@hubgyms.com		15864257//1	<p>Old Mill Road Site – proposed mixed use allocation Representations by the Fitness Hub</p> <p>The Fitness Hub provides health/wellbeing services and employment opportunities for the local population in Portishead as well as business rate revenues for the Council. We are part of a thriving community of 23 businesses, employing >200 people operating from leased premises owned by Standard Life Investments (“SLI”) in Old Mill Road.</p> <p>This business community provides valuable economic activity mitigating the recognised high levels of out-commuting in Portishead. As an employment site it benefits from good access with premises that are fit for purpose for the foreseeable future.</p> <p>However the Council’s decision to identify Old Mill Road as a New Allocation for retail, tourist, leisure and residential facilities in its Site Allocations Plan Consultation Draft – February 2013 has put at significant risk:-</p> <ul style="list-style-type: none"> • The future of the [Fitness Hub] and other business in Old Mill Road; and • The associated economic benefits for Portishead. <p>SLI’s aspiration for the Site as a residential development opportunity is clear in the letter dated 27th April from GL Hearn, acting for SLI</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>responding to the March/April 2016 consultation. Extracts are provided below:-</p> <ul style="list-style-type: none"> • If it is the expectation that the site will deliver no more than 20 residential units that expectation will risk maximising the use of this sustainable brownfield site and the potential of the site to contribute towards residential needs. • The residential expectations for the site to be set out within Schedule 1 should be informed by an up to date assessment of the realistic deliverable residential capacity of the site. Ahead of any such assessment, whilst the inclusion of residential use is supported, the reference to 20 units should be deleted on the basis that the site may deliver a significantly higher number of residential units. • Policy SA6 seeks to protect land in existing economic use from a change to other uses unless certain criteria are met. The Old Mill Road site is not specifically protected as an employment site in the current Local Plan. The Site Allocations Plan should therefore be clear that land currently in economic use will be permitted to change if it is subject to an allocation and other policies in the Plan. <p>Whilst we support the Council’s amendments to Schedule 1 (highlighted in red below), introduced following our representations at the Council Executive meeting on 18th October 2016.</p> <p>Old Mill Road</p> <p>Consultation Version - March 2016: New allocation. Proposed as a mix of offices, retail, leisure, café’s, bars and restaurants and 20 residential units. Pedestrian/cycleway links to dockside development and adjacent supermarket required.</p> <p>Publication Version - October 2016: New allocation. Proposed as a mix of employment uses, retail, leisure, café’s, bars and restaurants and 20 residential units. Pedestrian/cycleway links to dockside development adjacent supermarket and proposed rail station required. Existing businesses to be relocated or incorporated into redevelopment scheme.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>These changes afford some ‘protection’ for the Old Mill Road business community but we believe the Council should go further. We propose that, as a minimum, the reference to ‘20 residential units’ should be replaced with ‘light industrial units’. In addition Old Mill Road should be designated as a Safeguarded Employment Site. In our view this would be entirely consistent with Policies SA4, SA5 and SA6, see extracts from the Site Allocations Plan Publication Version – October 2016.</p> <p>SA4 Employment Paragraph 4.15 states that:- Economic development is a priority for North Somerset as it has suffered from low levels of economic activity in recent years relative to high levels of residential development. This has contributed to high levels of out-commuting, and unsustainable development patterns and a key objective of the Core Strategy is to address this imbalance.</p> <p>SA5 Safeguarded Employment Sites Paragraph 4.32 states that:- As well as allocating new employment sites it is equally important that existing employment sites that have good access are purpose built, modern and compatible with surrounding uses are retained in employment use. In the past existing sites have been lost to non- employment uses which does not help to redress the balance between residential growth and provision of jobs the loss of key existing strategic employment sites would be contrary to Core Strategy objectives.</p> <p>SA6 Retention of Economic Uses Paragraph 4.33 states that:- In general it is desirable to maintain the overall stock of land and premises available to meet business needs over the plan period and beyond, not only those specifically allocated or safeguarded.</p> <p>One further point that needs addressing is that Old Mill Road has been marked as a ‘proposed</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>residential site'. This is incorrect. If you require any further information please do not hesitate to contact me.</p> <p>Yours Sincerely, Claire Cleeves</p>
Annette Hennessy		15913217//1	<p>It concerns me that North Somerset district councillors think that it is sufficient to say that they will be seeking to retain existing businesses as part of any future redevelopment. These are mere words that mean nothing. Old Mill Road, Portishead is likely to be demolished and there is no guarantee that the commercial capacity provided in any new buildings will be sufficient for the current organisations. Furthermore, most of the existing commercial establishments need to be able to operate without restrictions that may be applied if residential (mixed use) is applied.</p> <p>When the re-development of Old Mill Road was first discussed in Portishead Town Council as part of the Sites and Policies Plan Consultation Draft February 2013, under DM51, councillors regrettably supported mixed use developments. At that stage they should perhaps have been more careful and ensured they recommended the safeguarding of the current commercial units <u>in their entirety</u>. How, for example, is a thriving garage supposed to continue in a building with residential accommodation above it.</p> <p>Although North Somerset Council has said that when considering any planning application, they, "would be able to ensure it included employment", that does not provide the necessary reassurance that the existing commercial premises will be safeguarded. Of course the council will be able to ensure <i>some</i> employment because they want it to be mixed use. But Portishead residents need the assurance that the current commercial units will be completely protected, which means no loss of capacity. Our town cannot afford to lose valuable employment space nor the local enterprises that have built up thriving businesses.</p>

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			<p>Moreover, Portishead has seen more residential development than most other towns in North Somerset. Much of that was welcomed but sadly the developers did not know when to stop and some of the recent residential planning that has been approved by North Somerset Council has been inappropriate, such as that on the Bristol Road roundabout by Gordano School. Portishead has seen homes crowded on sites on Nore Road, The Marina, Village Quarter (Ashlands) and the latest on the Harbour Road Trading Estate (Harbour Edge). More residential homes are due to follow on Harbour Crescent (commercial land) and Harbour Road itself. So much residential development with little road improvement and infrastructure enhancement. The consultation document states that it is assumed that all facilities are currently in place in Portishead. That is an incorrect assumption and I would question this wording in the documentation.</p> <p>The current parking areas in Old Mill Road is essential for the businesses. The location will not have the capacity to provide for adequate residential parking as well as commercial and the businesses must take priority.</p> <p>North Somerset Core Strategy does need to deliver sustainable housing development but Portishead has been identified previously and our town is at full capacity. Valuable natural drainage land has been lost to huge developments increasing flood risk. It is time for other areas of North Somerset to meet the strategy requirements. My home town of Portishead cannot sustain further residential development.</p> <p>Portishead town centre is currently viable and has vitality. This may be lost if our existing commercial units in Old Mill Road are replaced with national chains. Portishead Town Centre does not need further regeneration.</p> <p>I disagree with the current political view, which appears to be that making Old Mill Road a mixed development site does not mean reducing the employment capacity. If any new development</p>

Name	Organisation	Comment ID	Comment Recieved
			cannot safeguard the current commercial units in their full capacity, then employment will be reduced and this is unacceptable.
Janem		15917377//1	<p>Old Mill Rd/ Homebase - McDonalds- Argos Retail Park PORTISHEAD</p> <p>I can not believe that NSC are riding roughshod over the residents (many long standing) with the shoe-horn basis of more housing in the town.</p> <p>Our schools are full, our Dr's are full, the roads are packed all day every day, the double decker buses are far too large to use the many narrow roads in what was once a village, there are few employment opportunities with even average UK salaries.</p> <p>Residents should not have to travel up or down them M5 (also at a standstill most days) due to NSC ignoring the needs of skilled labour within the town. We need jobs - Old Mill road is a thriving business park, not a derelict factory built 100 years ago. We do not need more housing and certainly not on this site. You took away the commercial land of AP Burt and are ALLOWING more housing - why?? I work on Kestrel Court which is massively overpriced rental units, we can not move to larger premises locally because there aren't any built or being built to suit the needs of the business leaders in the area. Why should we move out to Weston s Mare when our customers are in Portishead?? NSC is massively anti-business, only interested in bringing in council tax from residential sales and section 106.</p> <p>The Retail Park should have better links to the town centre NOT HOUSING - how about building 10 smaller units, lots of parking (we're short of that as well....) piazza style with cafes, trees, green space etc?? No need to flatten Old Mill Rd to provide low paid, low skill jobs - we already have the space to do it.</p> <p>10 mins outside this town are villages that are dying on their feet - how about building all of the</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>new houses there instead?? Wraxall, Failand, Tickenham, etc.</p> <p>Is it any wonder that the people of Portishead have little or no respect for our local council & its decision makers??</p>
Sylvia Holliman		15925857//1	<p>I write with regard to the proposals for the Old Mill Road site and the Argos site. These sites need to remain 100% commercial. The plan rightly stresses that economic development should be given high priority. This must not all be in large centres, such as J21. It is vital to retain small, local business areas.</p> <p>Policy SA6 of the consultation document is relevant. Loss of these sites would harm the range and quality of sites in the local market area. They are in a central area of the town, so locals can use them whilst using other facilities. Loss of the site would adversely impact on commuting patterns. Any residential development in this area would serve to add to the already crowded commute along just one road out of Portishead in the morning and back in the evening.</p> <p>We need local jobs for local people, and a balanced community as opposed to a dormitory town.</p> <p>A change of use of this land is NOT needed. The current businesses work, both for the businesses themselves and for the community. The access for the current usage works. Therefore, relocating the businesses is not a viable option.</p> <p>I urge you to reject any residential development on these sites, so that the current businesses can continue to thrive and the people of Portishead retain access to local services. The sites work well as they are. Please do not change them.</p>

Name	Organisation	Comment ID	Comment Recieved
Ryan's Garage	Ryan's Garage	15932609//1	<p data-bbox="866 454 1444 555">North Somerset Sites and Policies Plan Part 2 Site Allocations Plan, Publication Version October 2016</p> <p data-bbox="866 591 1385 692">Old Mill Road Site – proposed mixed use allocation Representation by Ryan’s Garage</p> <p data-bbox="866 728 1455 1039">Ryan’s Garage provides Garage; Bodyshop; Rental and Storage services and employment opportunities for the local population in Portishead. This is in addition to the business rate revenues for the Council. We are part of a thriving community of 23 businesses, employing over 200 people operating from leased premises owned by Standard Life Investments (“SLI”) in Old Mill Road.</p> <p data-bbox="866 1075 1449 1283">This business community provides valuable economic activity mitigating the recognised high levels of out-commuting in Portishead. As an employment site it benefits from good access with premises that are fit for purpose for the foreseeable future.</p> <p data-bbox="866 1319 1444 1491">However the Council’s decision to identify Old Mill Road as a New Allocation for retail, tourist, leisure and residential facilities in its Site Allocations Plan Consultation Draft – February 2013 has put at significant risk:-</p> <ul data-bbox="943 1527 1417 1664" style="list-style-type: none"> • The future of the Ryan’s Garage and other business in Old Mill Road; and • The associated economic benefits for Portishead. <p data-bbox="866 1700 1455 1872">SLI’s aspiration for the Site as a residential development opportunity is clear in the letter dated 27th April from GL Hearn, acting for SLI responding to the March/April 2016 consultation. Extracts are provided below:-</p> <ul data-bbox="1050 1908 1437 1977" style="list-style-type: none"> ◦ <i>If it is the expectation that the site will deliver no more than</i>

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			<p data-bbox="1082 331 1455 577"><i>20 residential units that expectation will risk maximising the use of this sustainable brownfield site and the potential of the site to contribute towards residential needs.</i></p> <ul data-bbox="944 609 1455 1415" style="list-style-type: none"> <li data-bbox="944 609 1455 990">• <i>The residential expectations for the site to be set out within Schedule 1 should be informed by an up to date assessment of the realistic deliverable residential capacity of the site. Ahead of any such assessment, whilst the inclusion of residential use is supported, the reference to 20 units should be deleted on the basis that the site may deliver a significantly higher number of residential units.</i> <li data-bbox="944 1025 1455 1415">• <i>Policy SA6 seeks to protect land in existing economic use from a change to other uses unless certain criteria are met. The Old Mill Road site is not specifically protected as an employment site in the current Local Plan. The Site Allocations Plan should therefore be clear that land currently in economic use will be permitted to change if it is subject to an allocation and other policies in the Plan.</i> <p data-bbox="865 1451 1455 1585">Whilst we support the Council’s amendments to Schedule 1 (highlighted in red below), introduced following our representations at the Council Executive meeting on 18th October 2016.</p> <table border="1" data-bbox="865 1617 1455 2002"> <thead> <tr> <th data-bbox="865 1617 944 1809"></th> <th data-bbox="944 1617 1184 1809">Consultation Version - March 2016</th> <th data-bbox="1184 1617 1455 1809">Publication Version - October 2016</th> </tr> </thead> <tbody> <tr> <td data-bbox="865 1809 944 2002">Old Mill Road</td> <td data-bbox="944 1809 1184 2002">New allocation. Proposed as a mix of offices, retail,</td> <td data-bbox="1184 1809 1455 2002">New allocation. Proposed as a mix of employment uses,</td> </tr> </tbody> </table>		Consultation Version - March 2016	Publication Version - October 2016	Old Mill Road	New allocation. Proposed as a mix of offices, retail,	New allocation. Proposed as a mix of employment uses,
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Ryan's Rentals	Ryan's Rentals	15933377//1	<p>North Somerset Sites and Policies Plan Part 2 Site Allocations Plan, Publication Version October 2016</p> <p>Old Mill Road Site – proposed mixed use allocation</p> <p>Representation by Ryan’s Garage</p> <p>Ryan’s Rentals provides Car and Van Rental services and employment opportunities for the local population in Portishead. This is in addition to the business rate revenues for the Council. We are part of a thriving community of 23 businesses, employing over 200 people operating from leased premises owned by Standard Life Investments (“SLI”) in Old Mill Road.</p> <p>This business community provides valuable economic activity mitigating the recognised high</p>

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Ryan's Storage	Ryan's Storage	15933473//1	<p>North Somerset Sites and Policies Plan Part 2 Site Allocations Plan, Publication Version October 2016</p> <p>Old Mill Road Site – proposed mixed use allocation</p> <p>Representation by Ryan’s Storage</p> <p>Ryan’s Storage much needed Storage services and employment opportunities for the local population in Portishead. This is in addition to the business rate revenues for the Council. We are part of a thriving community of 23 businesses, employing over 200 people operating from leased premises owned by Standard Life Investments (“SLI”) in Old Mill Road.</p> <p>This business community provides valuable economic activity mitigating the recognised high levels of out-commuting in Portishead. As an employment site it benefits from good access with premises that are fit for purpose for the foreseeable future.</p> <p>However the Council’s decision to identify Old Mill Road as a New Allocation for retail, tourist, leisure and residential facilities in its Site Allocations Plan Consultation Draft – February 2013 has put at significant risk:-</p> <ul style="list-style-type: none"> • The future of the Ryan’s Storage and other business in Old Mill Road; and • The associated economic benefits for Portishead. <p>SLI’s aspiration for the Site as a residential development opportunity is clear in the letter dated 27th April from GL Hearn, acting for SLI responding to the March/April 2016 consultation. Extracts are provided below:-</p>

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kyla probert	The Hub Gym	15946721//1	<p>North Somerset Sites and Policies Plan Part 2 Site Allocations Plan, Publication Version October 2016</p> <p>Old Mill Road Site – proposed mixed use allocation</p>

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charlie james		15947073//1	<p>North Somerset Sites and Policies Plan Part 2 Site Allocations Plan, Publication Version October 2016</p> <p>Old Mill Road Site – proposed mixed use allocation</p> <p>The Old Mill Road business provide health/ wellbeing services and employment opportunities for the local population in Portishead as well as business rate revenues for the Council.They are part of a thriving community of 23 businesses, employing >200 people operating from leased premises owned by Standard Life Investments (“SLI”) in Old Mill Road.</p> <p>This business community provides valuable economic activity mitigating the recognised high levels of out-commuting in Portishead. As an employment site it benefits from good access with premises that are fit for purpose for the foreseeable future.</p> <p>However the Council’s decision to identify Old Mill Road as a New Allocation for retail, tourist, leisure and residential facilities in its Site Allocations Plan Consultation Draft – February 2013 has put at significant risk:-</p>

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tom jackson	ryans rentals and storage	15947713//1	<p>I have lived in portishead for the past 12 years . i have worked for ryans self storage and rentals for the past 2 years . i feel old mill road is the heart of portisheads business's with lots of local people working here. i do not think that building even more houses that will barely fit in and causing even more traffic chaos at peak times is a great idea . wiping out local business's and having to relocate or find another job that youve worked very hard to get.</p>
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patrick Gardner	T&G Woodware Ltd	15978273//1	

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patrick Gardner	T&G Woodware Ltd	15978273//2	<p>I am Mrs Virginia Saunders, director at T&G Woodware Ltd who have been leaseholders in Old Mill Road since 1977 (39years).</p> <p>I have read the North Somersets “Sites Allocations and Policies Plan” regarding the development of land on and around Old Mill Road, Portishead. Development will depend on the actions and needs of the owners of this site Standard Life Investments whose only interest in this site is to improve their returns against their current investment with no due consideration to a sympathetic development suitable and sustainable for Portishead.</p> <p>Standard Life have intimated to us that they wish to develop the site with Housing, Retail, Leisure, Cafés, Bars and Restaurants with some</p>

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			<p>accomodation above which is no doubt what the Council's Planning department would like to hear. Portishead has already done it's bit for the additional housing urgently required with onwards of 4,000 properties within the confines of Portishead with little or no additional infrastructure. We suggest that Standard Life's proposal is a smoke screen for more intense commercial development.</p> <p>It also means that the existing employment would vanish from Old Mill Road (the largest single area for employment in Portishead and environs)</p> <p>None of this makes sense. The existing businesses are already providing Mixed Employment and if they are forced to move they are unlikely to return. Whereas, the proposal of retail does <u>not</u> provide solid full time jobs, are low paid and are not likely to thrive while retailers like Marks & Spenser are closing many stores and independant retailers are rapidly diminishing under the onslaught of Internet buying and the muscle of the larger retailers who will be drawn to Cribbs Causeway or The Cabot Centre.</p> <p>The costs of developing the current site do not add up and would allow considerable investment from the council, as yet unidentified but underlying here.</p> <p>To replace the current employment, that is thriving inspite of difficult trading conditions, is a gamble for the site owners, a gamble for the council and the destruction and trust of those concerned over this proposed site development and the loss of nearly 300 multi-skilled, mixed employed workforce who are likely to spend more in the town than a part time retail work force.</p>
Rosemary		15979393//1	<p>I object to the changes proposed to Old Mill Road in Portishead. Portishead has more than met the challenge of housing development in the past 35 years, and more recently housing has been developed faster than any other town in Europe,</p>

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			<p>so it has been said. But all this has come at a price of losing heavy and light industry and hundreds if not thousands of jobs of substance in what was a high employment area. People used to travel to Portishead to work as opposed to the thousands now having to commute each day to their places of employment and the toll that is putting on infrastructure and the environment.</p> <p>Portishead is also already inundated with cafes, bars, restaurants and shops and there is such a thing of getting a balance in life. People working in Old Mill Road are already working in skilled jobs and businesses which benefit the town. They are not wanting to lose those so they can join the daily commute out of town, providing they can secure other jobs, and that will become harder as a result of continuing austerity as announced this week by this government. They are contributing on a daily basis to the economy of the cafes, shops, bars and restaurants that are already here! Take them out the town and you drive the economy of our existing retail trade down still further in these challenging times. I hope the sugar coated proposals, which at the end of the day are only there to make the developers a quick buck and run; and to assuage meeting targets of house building in this country, are looked at with eyes wide open and with the foresight and skill that Portishead and it's hardworking residents deserve.</p>
ge83		15986657//1	<p>Old Mill Road provide employment for 200+ locals and commuters. Offering skilled jobs and the opportunity to earn a decent salary in something else other than retail. Yes the area could do with a face lift in comparison to the surrounding areas, however more houses will do nothing except increase the population, traffic and strain on already stretched local services. Support the community and the local business' who have stood here for years, who have loyal employees who bring revenue into the town.</p>

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Maddie		15989793//1	<p>North Somerset Sites and Policies Plan Part 2 Site Allocations Plan, Publication Version October 2016</p> <p>Old Mill Road Site – proposed mixed use allocation</p> <p>The Old Mill Road business providehealth/ wellbeing services and employment opportunities for the local population in Portishead as well as business rate revenues for the Council.They are part of a thriving community of 23 businesses, employing >200 people operating from leased premises owned by Standard Life Investments (“SLI”) in Old Mill Road.</p> <p>This business community provides valuable economic activity mitigating the recognised high levels of out-commuting in Portishead. As an employment site it benefits from good access with premises that are fit for purpose for the foreseeable future.</p> <p>However the Council’s decision to identify Old Mill Road as a New Allocation for retail, tourist, leisure and residential facilities in its Site Allocations PlanConsultation Draft – February 2013 has put at significant risk:-</p> <ul style="list-style-type: none"> • The future of the businesses in Old Mill Road; and

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Drew	Coffetek Limited	15991329//1	<p>The Old Mill Road business provides employment opportunities for the local population in Portishead as well as business rate revenues for the Council. They are part of a thriving community of 23 businesses, employing</p>

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			<p>>200 people operating from leased premises owned by Standard Life Investments (“SLI”) in Old Mill Road.</p> <p>This business community provides valuable economic activity mitigating the recognised high levels of out-commuting in Portishead. As an employment site it benefits from good access with premises that are fit for purpose for the foreseeable future.</p> <p>However the Council’s decision to identify Old Mill Road as a New Allocation for retail, tourist, leisure and residential facilities in its Site Allocations Plan Consultation Draft – February 2013 has put at significant risk:-</p> <ul style="list-style-type: none"> • The future of the businesses in Old Mill Road; and • The associated economic benefits for Portishead. <p>SA4 Employment</p> <p>Paragraph 4.15 states that:-</p> <p><i>Economic development is a priority for North Somerset as it has suffered from low levels of economic activity in recent years relative to high levels of residential development. This has contributed to high levels of out-commuting, and unsustainable development patterns and a key objective of the Core Strategy is to address this imbalance.</i></p> <p>Coffetek Limited operates from three linked units on the Oldmil Road estate. The scale of Coffetek's operation is such that premises of in excess of thirty thousand square feet are needed. No similar premises exist in Portishead so relocation within the town would be impossible. In the event that the site were to be redeveloped the company would have no alternative but to relocate. Coffetek primarily</p>

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			<p>operates in the manufacturing sector. It is the UKs premier manufacturer of Vending Equipment. It provides employment for 80 individuals on the site via a mixture of highly skilled and semiskilled roles. As a manufacturing company it also generates further employment via its supply chain which includes many other companies both locally and nationally. Coffetek is part of a Spanish stock market listed multinational with manufacturing capabilities in several countries, relocation of its UK manufacturing operation within the county or indeed the country would not necessarily be the most economically attractive solution if faced with a requirement to relocate. The loss of employment would therefore potentially be considerable.</p> <p>SA5 Safeguarded Employment Sites</p> <p>Paragraph 4.32 states that:-</p> <p><i>As well as allocating new employment sites it is equally important that existing employment sites that have good access are purpose built, modern and compatible with surrounding uses are retained in employment use. In the past existing sites have been lost to non- employment uses which does not help to redress the balance between residential growth and provision of jobs.....the loss of key existing strategic employment sites would be contrary to Core Strategy objectives.</i></p> <p>SA6 Retention of Economic Uses</p> <p>Paragraph 4.33 states that:-</p> <p><i>In general it is desirable to maintain the overall stock of land and premises available to meet business needs over the plan period and beyond, not only those specifically allocated or safeguarded.</i></p>

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RJ Wollerton		16014177//1	<p>In my opinion, Councillors would be failing in their duty if this development was approved.</p> <p>A lack of similar premises in the Portishead area would mean businesses would find it impossible to relocate nearby to continue trading. Their employees would therefore lose employment. The town's shops would, by a knock on effect, lose sales.</p> <p>Should this development go ahead it would be a disaster for these local business and the town.</p>
Bunnings-Homebase UK & Ireland		16017409//1	<p>DRAFT NORTH SOMERSET SITE ALLOCATIONS PLAN – HOMEBASE, WYNDHAM WAY RETAIL PARK, PORTISHEAD</p> <p>I refer to the Draft Site Allocations Plan consultation which is currently taking place. I act on behalf of Bunnings-Homebase UK & Ireland.</p> <p>My clients have instructed me to submit representations to the Draft Plan in relation to the proposals for the Old Mill Road site, which includes their Portishead Homebase store.</p> <p>As you may be aware, in February this year Homebase was sold to Bunnings (part of Wesfarmers Ltd). Bunnings are the leading retailer of DIY, home improvement and outdoor living products in Australia and New Zealand. Its core aims are to provide customers with access to a wide range of home improvement products at the lowest prices, backed by the best level of service.</p> <p>Bunnings is firmly committed to the Portishead Homebase store, which is the subject of a long Lease. Bunnings strategy in the UK & Ireland is to invest in the core of the business (Homebase), introduce the Bunnings offer and quality of service and secure growth through the expansion of the portfolio and where feasible the expansion of individual stores.</p>

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			<p>We note that Policy SA 1 of the Draft Plan seeks to identify sites that could accommodate 10 or more new residential units. Draft Policy SA 3 also seeks to identify sites that could accommodate mixed-uses. These sites are then listed in Schedule 1 and include the Old Mill Road site, which, as shown on the interactive Proposals Map, includes the Homebase store. The ‘Site Specific Details’ indicate that this is a ‘New Allocation’ and that the proposal is the promote a mix of employment uses, retail, leisure, café’s, bars, restaurants and 20 residential units. It goes onto indicate that "<i>Existing businesses to be relocated or incorporated into redevelopment scheme.</i>"</p> <p>My client’s clear preference is to remain on their existing site on the Wyndham Way Retail Park as this is a well-established retail destination and comprises a Homebase store that meets their business requirements.</p> <p>Given the above, my clients object to draft Policy SA 1 and SA 3. In our view, both policies fail to meet any of the criteria in paragraph 182 of the National Planning Policy Framework (NPPF) (March 2012) and are unsound. In particular, both policies:</p> <ul style="list-style-type: none"> • Lack any detail, other than in relation to the proposed residential use, of the quantum, layout and scale of development that will be sought within the mixed-use scheme • Provide no indication of whether the existing quantum of retail floorspace that exists within the Wyndham Retail Park will be retained • Provide no indication as to whether the intention is for existing businesses, such as Homebase, to remain as existing or be redeveloped or relocated • Do not identify any alternative sites that existing businesses could be relocated too, if required and neither are there any other policies in the Plan that seek to allocate alternative sites

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			<ul style="list-style-type: none"> • Provide no detail or evidence of the viability of redeveloping the site or the mechanism for achieving any redevelopment <p>In summary, the level of detail, justification and evidence that you would expect to see supporting a 'New Allocation' in a plan of this nature is completely absent. Nothing within the Draft Plan provides my clients with any clear indication as to the Council's proposals for this site and specifically the implications for its Homebase store - which forms an important part of the comparison offer of Portishead and is a significant local employer. As such, the proposed allocation and the corresponding policies, when considered against the advice in paragraphs 150 – 182 (inclusive) of the NPPF, is clearly unsound.</p>
helen.lewis35@gmail.com		16031937//1	<p>As a resident of Portishead, I object to houses being built on Old Mill Road trading estate. My reasons for this is that over the last few years an awful lot of houses have been built in Portishead and there are not enough jobs locally for the people that live in these houses. To demolish a trading estate that provides some local jobs in order to build more houses does not make sense and for this reason I object to this proposal.</p>
Liz Edwards		16041825//1	<p>As a resident of Portishead for 11 years now I would like to say I do not support the tearing down of Businesses on Old Mill Road.</p> <p>I am a regular user of the Hub gym along with my entire family- one husband and two daughters. I also use Ryan's rentals and there is not another car rental in Portishead.</p> <p>My children also visit the soft play so we would all live much healthier lives if you took these facilities away from us.</p>

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			<p>Portishead has expanded hugely in the time I have been here and our infrastructure and services are at the point of not coping at all.</p> <p>Please do not bring more houses to Portishead until you can provide us with relief on entering and leaving Portishead and guaranteed school places for our children. This doesn't even touch on the shortage of Doctors to look after us all.</p> <p>We need investment in the form of a rail link not more houses- this would help us to reduce traffic pressures and encourage more people to take public transport into Bristol.</p> <p>Please help us.</p>
Mrs Gentle		16044737//1	<p>I felt I had to write regarding the new proposal for Old Mill Road. This industrial estate has a real community feel, and employs a lot of local people. They in turn shop locally which benefits everyone.</p> <p>When I read that the proposal would include more cafe's, bars and restaurants I was flabbergasted, and did a count of food outlets, takeaways and restaurants already selling food.</p> <p>Starting from the Cabstand through to the Albion public house, there are 23. This is without the Marina, do you think we really need anymore?</p> <p>If housing was to be built they would need parking, and maybe they would work outside of the area, hence more traffic on the already congested roads!</p> <p>Please re-think this application, and think of the 200 people now employed, what would happen to them? Why do we need to alter something that is working so well! It seems to me that its all about making money, at the expense of the people!</p>

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			Yours sincerely Mrs T Gentle
Playzone Of Portishead Management	Playzone of Portishead LTD	16054593//1	<p data-bbox="874 600 1452 698">North Somerset Sites and Policies Plan Part 2 Site Allocations Plan, Publication Version October 2016</p> <p data-bbox="874 770 1417 904">Old Mill Road Site – proposed mixed use allocation Representations by Playzone of Portishead LTD</p> <p data-bbox="874 976 1442 1290">Playzone of Portishead LTD provides childcare services and employment opportunities for the local population in Portishead as well as business rate revenues for the Council. We are part of a thriving community of 23 businesses, employing >200 people operating from leased premises owned by Standard Life Investments (“SLI”) in Old Mill Road.</p> <p data-bbox="874 1294 1449 1500">This business community provides valuable economic activity mitigating the recognised high levels of out-commuting in Portishead. As an employment site it benefits from good access with premises that are fit for purpose for the foreseeable future.</p> <p data-bbox="874 1505 1442 1680">However the Council’s decision to identify Old Mill Road as a New Allocation for retail, tourist, leisure and residential facilities in its Site Allocations Plan Consultation Draft – February 2013 has put at significant risk:-</p> <ul data-bbox="874 1751 1436 1957" style="list-style-type: none"> • The future of the Playzone of Portishead LTD and other business in Old Mill Road; and • The associated economic benefits for Portishead. <p data-bbox="874 1921 1388 1957">SLI’s aspiration for the Site as a residential</p>

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Alice		16054689//1	<p>I work full time in old mill road at play zone. If this was turned in to house I would then lose my job and potentially lose my home. There for I would assume you would then be offering me one of the house you are intending to build. I appreciate that people need homes but people also need employment to keep the homes they have. You take demolish our place of employment to home those without we are then without so where will you build our house do you not understand we are working for a living we are working for our homes. How can you possible think that this is beneficial propsial?</p> <p>Find vacant land don't take our land.</p>
Gen	Playzone	16054753//1	<p>I feel it's important to save old mill road portishead it provides jobs and it's part of portishead's history if you build more houses the traffic will become even more congested and there is only one way in and out of portishead as it is there will be no parking and no jobs as it will be full of houses which are not needed</p>
Tracy Halford		16064737//1	<p>I am writing to voice my disapproval of the plan to convert the old mill road business site incorporating old mill road and the Homepage/ Argos site from business use to residential. Both areas are packed with thriving businesses that are used by the whole town and contribute many jobs and economic property to the area. It seems madness to build more houses at the direct expense of viable and well used businesses and facilities.</p>

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			<p>There are other potential and more suitable areas identified for future housing in Portishead. Indeed the town has rapidly expanded in the last 20 years with relatively little additional infrastructure or services being provided, despite the promises that were made at the time. The roads in and out of portishead already struggle with the daily exodus to Bristol and the roads past the proposed site are already grid locked at these times and at other busy periods (e.g. School start/end)</p> <p>I suggest this application is declined as it would actually reduce the services and facilities to an already over strained and under served town.</p>
Standard Life Investments		16123553//1	<p>GL Hearn acts for Standard Life Investments (SLI), which manages the Phoenix Life Fund, owners of the Old Mill Road site.</p> <p>On behalf of our client, GL Hearn submitted representations to North Somerset Council (NSC) in April 2016 in respect of the Site Allocations Plan Consultation Version which included confirmation of SLI's ownership of the Old Mill Road site and the adjoining Wyndham Way Retail Park, as well as details of the lease expiry dates of the site's current tenants.</p> <p>Since April 2016 the NSC 'Sites and Policies Plan Part 1 Development Management Policies' has been adopted (formally adopted on 19 July 2016) and which confirms the Old Mill Road and Wyndham Retail Park sites are within Portishead Town Centre (Policy DM60</p> <p>The Council's response to our (April 2016) representations is set out in Council document "<i>Appendix 4: Summary of comments made on the March 2016 Consultation Draft of the Site Allocations Plan and the Council's Response (Consultation Statement)</i>" reported to the Council's Executive on 18th October 2016.</p> <p>The Consultation Statement confirms the Council's response to be:</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>"Site details to be amended to include the provision of an additional residential units. Site boundaries to be widened to incorporate additional land which may be required for a better comprehensive redevelopment in the longer term."</p> <p>NSC Officer recommendations to the Council's Executive on 18th October sought agreement to:</p> <p>"i) the Publication version of the Site Allocations Plan is approved for public consultation followed by submission to the Secretary of State;</p> <p>ii) the Publication version of the Site Allocations Plan is given weight in assessing development proposals;</p> <p>iii) any further minor typographical amendments or changes required prior to submission are agreed by the Director of Development and Environment in consultation with the Leader and Deputy Leader."</p> <p>The minutes of the 18th October Executive (which we understand were approved as a correct record by NSC Executive, 6th December) confirms the Council resolved to agree the officer recommendations, subject to:</p> <p>? a change to the proposed number of houses at a site at Yatton (Moor Lane); and,</p> <p>? that the submission of the plan to the Secretary of State is accompanied by a "<i>summary of the issues raised by individual members</i>" (of the Executive at the 18th October meeting).</p> <p>Policy SA3, and specifically "<i>Schedule 1: Proposed large sites for residential development (over 10 dwellings)</i>", as reported to the Executive for approval for public consultation followed by submission to the SoS maintains the Old Mill Road site as a mixed-use site, but with a proposed amendment to the 'site specific details/notes' to change the expected residential capacity of the site from 20 to 100 units, and a further</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>amendment to include reference to Flood Risk Assessment.</p> <p>For clarification and the avoidance of any doubt, the "100" residential units reference at Schedule 1 is a figure put forward by North Somerset Council and we are not aware of any site capacity assessment or other evidence supporting it. Our April 2016 representations to the consultation draft version of the Plan proposed that the Schedule 1 wording for Old Mill Road should not specify a figure for expected residential capacity for the site, as does this representation.</p> <p>The full wording of the proposed "<i>site specific requirements or key considerations</i>" for the Old Mill Road site (as required by Policy SA3) as reported to, and agreed by, the NSC Executive is:</p> <p>"New allocation. Proposed as a mix of offices, retail, leisure, café's, bars and restaurants and 100 residential units. Pedestrian / cycle links to dockside development and adjacent supermarket required. A Flood Risk Assessment, sequential and exception test will need to accompany any planning application"</p> <p>The accompanying "<i>plan showing significant changes to the Policies Map</i>" (agreed by the Executive) indicates the inclusion of the Wyndham Retail Park within the Old Mill Road allocation, although it excludes land close to the junction of Old Mill Road and Wyndham Way, which is also owned by our client and which was shown on a plan submitted to the Council as part of our representation at the consultation draft stage</p> <p>Subsequent to the 18th October Executive, the proposed allocation of the site (detailed by Schedule 1) was revised, effectively reversing the agreement of the Executive and reverting to the proposed residential capacity for the site to 20 units, as well as setting additional requirements, including that "<i>Existing businesses to be relocated or incorporated into redevelopment scheme</i>". The further revision to the Site</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>Allocations Plan following the resolution of the Council's Executive on 18th October is unusual and we understand there will be further deliberation of the draft Plan by the Council's 'Planning and Economic Development Policy and Scrutiny Panel' and Executive before it is submitted to the SoS for examination.</p> <p>For the purposes of effective policy making, it is important to note that as far as we are aware there is no evidence to support the reference to 20 residential units within Schedule 1, nor is there any evidence we are aware of to support or justify a planning policy requirement for redevelopment of the site to 'relocate' existing businesses at the site or provide accommodation for the businesses within any redevelopment scheme.</p> <p>Policy SA3/Schedule 1</p> <p>Housing Use</p> <p>Whilst there is no indication within the Site Allocations Plan (or elsewhere within the Development Plan) that Policy SA3 and specifically Schedule 1 should be read as prescribing the maximum number of residential units to be delivered at the site, we consider the Council's actions (as summarised above) indicate that, in practice, the Council's likely interpretation of Policy SA3/Schedule 1 will be to treat the residential capacity figure for the site as a fixed amount, and the Council may therefore seek to resist redevelopment proposals for the site that include a higher number of residential units (and seek to maximise the use of this sustainable brownfield site).</p> <p>There is no evidence to support a position that the site should contribute only 20 residential units nor, for that matter, is there any evidence that the site should / could contribute any number of residential units. However, it is the case that the site is a sustainable brownfield site and as such redevelopment of the site would represent an opportunity to provide new residential provision in line with national and local policy, including</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>draft national policy to support higher density housing development around commuter hubs, and at a local level, Policies CS13 (adopted) and CS31(CC-MM04) that expect the delivery of a minimum number of dwellings within North Somerset by 2026, including a minimum of 3300 at Portishead.</p> <p>Denying the potential of a suitable and sustainable site to contribute fully to delivering sustainable development, promoting economic growth and meeting identified housing need, by applying an arbitrary and unsupported control on the residential capacity of a site, cannot be considered to be consistent with national policy or justified in the context of the test of soundness.</p> <p>As we set out in our representation at the Consultation Draft stage, we consider the site has potential to deliver considerably more than 20 residential units as part of a comprehensive mixed-use scheme that could include new retail and leisure uses and other regeneration benefits in addition to residential provision.</p> <p>In the absence of an up-to-date assessment of the realistic deliverable residential capacity of the site the reference to 20 units at Schedule 1 should be deleted or, as a minimum, should be qualified as a minimum expectation.</p> <p>Employment Use</p> <p>The proposed expectation within Schedule 1 of the Site Allocations Plan that development of the Old Mill Road site will either relocate existing businesses or incorporate existing businesses into a redevelopment scheme, is not supported by any evidence supporting, demonstrating or justifying that requirement in planning terms.</p> <p>The 'requirement' is also inconsistent with proposed Policy SA6, which rightly recognises, as a matter of principle, that land in existing economic use should be able to change to an alternative use, subject to certain conditions being met.</p>

Name	Organisation	Comment ID	Comment Received
			<p>Policies SA4, 5 and 6 of the Site Allocations Plan collectively provide proposed policies for the allocation and protection of employment sites. Schedule 2 and Schedule 3 of the Site Allocations Plan defines (respectively) '<i>Proposed Employment Sites</i>' and '<i>Safeguarded Employment Sites</i>'. Paragraph 4.20 of the Site Allocations Plan explains that the proposed employment policies have been informed by evidence including an Economic Development Needs Assessment and "<i>earlier work the Council commissioned</i>" although the 'earlier work' is not specified by the Plan.</p> <p>There is no policy basis, consistent with the employment (Class B) objectives, evidence and provisions of the Site Allocations Plan, to justify the expectation for redevelopment of the Old Mill Road site to relocate existing businesses or incorporate existing businesses into a redevelopment scheme.</p> <p>Mixed-use</p> <p>The Old Mill Road site and neighbouring sites form part of Portishead Town Centre as defined by the adopted NSC Development Management Policies, Sites and Policies Plan Part 1. The Old Mill Road site lies at the heart of the defined town centre and is recognised by the Site Allocations Plan Sustainability Appraisal as a sustainable site.</p> <p>As a town centre site the use of the Old Mill Road site for retail and other town centre uses is supported. Policy CS21 of the NSC Core Strategy confirms that 'town centre uses' in the context of the policy includes the uses anticipated for the site by Policy SA3 / Schedule 1 (excluding "<i>employment uses</i>") and applies no specific upper limit to the scale or quantum of town centre uses within Portishead Town Centre. Rather the Core Strategy identifies a "<i>strategic requirement ...to secure a greater market share for Portishead</i>" and supports development of town centre uses that are of a scale appropriate to the size and role of the centre. Additionally Policy CS31 (CC-MM04) supports shopping and town centre uses</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>within Portishead "<i>which improve the town centre environment and the retail, leisure, and employment offer</i>".</p> <p>Given the site's town centre location and its associated potential to deliver a range of town centre uses in line with CS21 and CS31, it should be made clearer within the Site Allocations Plan (such as at Schedule 1) that there is no explicit requirement for redevelopment of the site to provide all of the stated uses, but rather that the range of uses proposed should reflect the objectives of adopted policy. This will provide flexibility to bring forward a scheme that can adapt to market demand at the time</p> <p>The site specific details/notes at Schedule 1 also set a requirement for redevelopment of the Old Mill Road site to provide "<i>pedestrian/cycle links to dockside development and adjacent supermarket.</i>"</p> <p>The principle that any redevelopment of Old Mill Road site, as a key redevelopment site at the heart of Portishead Town Centre, should link well with neighbouring parts of the town centre and/or neighbouring areas is supported, however it should be recognised that the capacity of a development to physically provide links to other areas extends only as far as the edge of the site and any policy expectation - expressed by way of Schedule 1 – requiring provision beyond the site is not justified and may risk the delivery of the development.</p> <p>Policy SA6 Policy SA6 seeks to protect land in existing economic use from a change to other uses unless certain criteria are met. The criteria would appear to be likely satisfied by the redevelopment of the Old Mill Road (and Wyndham Way Retail Park) site for mixed use development in the manner expected by Schedule 1. However, the wording of Policy SA6 unnecessarily introduces a degree of risk to the delivery of development of the Old Mill Road site (and conceivably other sites) and therefore the effectiveness of Policy SA3 and/or</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>Policy SA6. We consider the potential conflict between Policy SA3 and SA6 can be suitably resolved by the explicit recognition within Policy SA6 that land currently in economic use will be permitted to change if it is allocated by other policies in the Plan.</p> <p>On the basis of the above, we submit that Policy SA3 / Schedule 1 and Policy SA6 cannot currently be considered sound, but amendments to the policies as set out below, would render them sound.</p> <p>Schedule 1: Old Mill Road <u>Delete reference to 20 units.</u> Amend text to read: <u>“New allocation. Proposed mixed use development providing a range of town centre uses, including retail (Class A), leisure (Class D2) and residential (Class C3). Pedestrian/ cycleway links within the site to enable pedestrian/cycle connection with neighbouring sites including dockside development, adjacent supermarket(s) and proposed rail station. A Flood Risk Assessment, sequential and exception test to be provide in accordance with national/local policy”.</u></p> <p>Policy SA6 Amend policy text to read: <u>“Land in existing economic use will be permitted to change to an alternative use if it is allocated for alternative use(s) by another policy in the Plan, or where it can be demonstrated that:...”</u></p>
Portishead Town Council	Portishead Town Council	4193569//1	<p>PTC does not understand why Old Mill Road is being considered for redevelopment as mixed use to include 20 residential units. It should be in Schedule 3 as a safeguarded employment site as it is a very successful employment site. Portishead has made a huge contribution to NSC’s required housing allocation but adding 20 units on this site is counter intuitive. PTC expects this site to be reassigned to Schedule 3.</p>

Section

Total for Portishead

Name	Organisation	Comment ID	Comment Recieved
Environment Agency	Environment Agency	1020673//5	<p>Portishead</p> <p>We are potentially seeking financial contributions for managing the flood risk on the Portbury Ditch catchment. Developments in the Portishead area will potentially increase runoff into the Portbury Ditch catchment putting additional pressure on this length of watercourse.</p>
Highways Agency (S Walsh)		8141345//8	<p><u>Portishead</u></p> <p>Portishead is identified as having a proposed capacity of 373 dwellings, 1.6 hectares for proposed employment sites and 25.1 hectares for safeguarded employment sites. The development sites have a remaining capacity for 128 dwellings with full planning consent and 14 with outline permission.</p> <p>The proposed developments are likely to influence Junction 19 of the M5. This junction already experiences capacity issues in the morning and evening peaks, in particular the northbound off-slip in the morning peak and the southbound off-slip in the evening peak. An evidence base will need to be presented to consider the influences at the SRN and the requirements for future improvement of the junction as recognised by Core Strategy Policy CS10 Transportation and Movement.</p> <p>It is currently been determined by Highways England whether the Portbury Hundred (A369) from M5 Junction 19 into Portishead needs to be dualled. We are content that there are no allocations on this stretch of road that would constrain or compromise this.</p>

Section Land to the east and west of Wemberham Lane, Yatton

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//21	Significant drainage issues in downstream catchment, development should contribute to reducing existing flood risk.
Persimmon Homes Severn Valley	-	3361153//7	This is one of a number of relatively small sites Persimmon Homes Severn Valley control with other partners. The problem with such sites is that they are too small to be split and shared by both parties and therefore either need one partner to transfer their interest to the other or for both to dispose of their interest to a third party, which will generally be a smaller house builder or contractor. Persimmon Homes Severn Valley have a programme in place for with dealing with such sites. Whilst this site is one of the previous Local Plan allocations, which have so far not come forward in view of the above issues, it is our intention that it will be brought forward as part of that programme and will therefore definitely be developed either by ourselves, our partners or a third party. As a small site it potentially offers something different to other larger allocations in Yatton.

Section**Oxford Plasma, Yatton**

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//22	<p>Outside of the Board's district, but drains into the Board's district.</p> <p>Significant drainage issues in downstream catchment, development should contribute to reducing existing flood risk.</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>Development will be expected to contribute to reducing existing flood risk.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>

Section**Arnolds Way, Yatton Phase 1**

Name	Organisation	Comment ID	Comment Recieved
Bloor Homes	-	3399393//1	<p>The Site Allocations Proposals Map correctly identifies the extent of phases 1 and 2 at Arnolds Way, Yatton. However, as the school will now be delivered as part of phase 2 (to provide potential for a larger and more suitable site), the land identified for the school needs to be amended on the Proposals Map (currently shown to be within phase 1) to reflect the Councils approved proposals. Please refer to the concept plan as set out in appendix 2 for the revised location of the school as per the approved (subject to completing the section 106) phase 2 scheme.</p> <p>Site plans attached.</p>

Section

Yatton Station

Name	Organisation	Comment ID	Comment Recieved
Tony moulin		14823361//1	<p>My comment relates to the attached previous correspondence with Phil Anelay regarding the Network Rail land (ex coal yard) situated between Yatton railway station downside car park and the Strawberry Line LNR. This area was identified in the 2007 Local Plan, in accordance with policy ECH/14, as a buffer zone to protect the nature conservation interest of the LNR. This designated protection should therefore also be respected in the SAP in order for it to meet the requirements of NPPF para 182 to be consistent in delivering sustainable development, contributing to protecting and enhancing the natural environment namely in this instance the Strawberry Line LNR.</p> <p>Although brown land this undisturbed area is now and has been since the railway closure an integral part of the disused railway line junction and has ecological value in its own right. It was for example part of a donor site for the translocation of a substantial colony of slow worms as part of development mitigation.</p> <p>This small area of land should therefore be protected and excluded from built development through amendment to Schedule 1 as suggested or if not through other appropriate designation.</p>
North Somerset Internal Drainage Board (Simon Bunn)		16130337//23	<p>Significant drainage issues in downstream catchment, development should contribute to reducing existing flood risk.</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>Development will be expected to contribute to reducing existing flood risk.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>
Yatton Parish Council	Yatton Parish Council	3106433//2	<p>We believe this area should also be removed as a potential site for housing development. Yatton Railway Station needs additional parking facilities to prevent on-street parking and to meet increasing demand. An improvement in the facilities at Yatton Station would encourage the use of public transport.</p>

Section**Moor Lane, Backwell**

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//24	<p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>Development will be expected to contribute to reducing existing flood risk.</p> <p>This should be noted in the 'Site specific details/notes' column.</p> <p>Significant drainage issues in downstream catchment, development should contribute to reducing existing flood risk.</p>
Brockley Parish Council	Brockley Parish Council	8119457//1	<p>Brockley Parish Council would like to express concern about the proposed development in west Backwell on land that is, at present, tranquil, farmed countryside within a comparatively densely populated and developed area that has managed to retain a rural component. This social and visual characteristic is fragile and will certainly change fundamentally as a result of such a large scale development.</p> <p>In addition, Backwell offers very limited employment prospects which would mean considerable out-commuting by a significant proportion of the new residents proposed.</p>

Section**Cobthorn Way, Congresbury**

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//25	<p>Outside Board's district but will drain into the Board's district.</p> <p>Significant drainage issues in downstream catchment, development should contribute to reducing existing flood risk.</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>Development will be expected to contribute to reducing existing flood risk.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>
Cadplan		3897665//4	<p>-Unsuitable location for multiple homes due to unsuitable road network, impact on the character of the area.</p> <p>-Few shops in the village so more traffic movements to Yatton & WSM</p>

Section**Venus Street, Congresbury**

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//26	<p>Outside Board's district but will drain into the Board's district.</p> <p>Significant drainage issues in downstream catchment, development should contribute to reducing existing flood risk.</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>Development will be expected to contribute to reducing existing flood risk.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>

Section

Land at North End, Yatton

Name	Organisation	Comment ID	Comment Recieved
Hallam Land Management	Hallam Land Management	14402689//1	<p>These representations are made by David Lock Associates on behalf of Hallam Land Management (HLM) in response to consultation on the consultation draft to the above document.</p> <p>Hallam Land Management has sought to work with North Somerset Council since 2014, alongside an unfolding policy context, to deliver some 170 homes at North End, Yatton, to help meet the housing needs of the district. In March 2016, Members of the Planning Committee resolved to approve development at North End, together with additional development adjacent at Arnolds Way, Yatton, as proposed by Bloor Homes.</p> <p>In this context, Hallam Land Management supports the inclusion of Land at North End within the Site Allocations Plan and more generally supports the contribution that Yatton can make in helping to sustainably deliver a significant proportion of the housing requirement over the Plan period.</p> <p>Yatton benefits from a good range of local facilities including shops, schools, nurseries, food outlets, a post office and a library as well as a number of office, distribution and manufacturing employment opportunities. Yatton provides a service role function beyond its immediate locality and is well served by sustainable transport modes; Yatton Railway Station provides connections by rail to destinations including Torquay, Exeter, Taunton, Weston-super- Mare, Nailsea & Backwell, Bristol and Cardiff.</p> <p>Support is given to the principle of identifying future sites for infrastructure, such as land for education at The Batch, to meet additional growth needs in Yatton.</p> <p>Paragraphs 4.9 of the document confirms the approach taken with the Core Strategy (remitted policies), to deal with an increased supply requirement which includes increasing flexibility at the services villages by allowing new residential development to come forward adjacent to settlement boundaries, through the development management process. Further confirmation is given to the significant impact on supply that this approach will support, to ensure that the Local Plan growth requirements are met.</p>

Name	Organisation	Comment ID	Comment Received
			<p>Policy SA2</p> <p>Notwithstanding the clear implications between the various emerging policy documents and setting aside arguments relating to the Council's assumptions of housing land supply, Schedule (1) to Policy SA2 sets out the Council's proposed site allocations which total 11,525 dwellings, and identifies development at North End Yatton to deliver some 170 dwellings of the Plan requirement.</p> <p>Schedule 1 to Policy SA2</p> <p>The Schedule sets out a list of site specific details/notes for each allocation. Development proposals at North End demonstrate accordance with this approach.</p> <p>It is noted that the notes continue to make reference to the 5km consultation zone for Bats SAC. We also wish to reiterate that Land at North End has been subject to a HRA screening process which confirms there will be no likely significant impact upon European Sites resulting from the development of the site. Indeed, no adverse impacts, nor technical objections have been identified relating to the development of the site at North End.</p> <p>We also note that reference to a "Comprehensive Surface Water Strategy", remains and we would reiterate that details of such a water strategy have not been made clear to applicants/developers.</p> <p>The inclusion of a requirement for a Comprehensive Water Strategy is not considered to be justified, in that it has not been demonstrated to provide the most appropriate strategy when considered against reasonable alternatives, nor is it an approach that is based on proportionate evidence.</p> <p>Development proposals at North End demonstrate that an appropriate drainage solution can be achieved on site, which provides a positive environmental impact through reduction in run off flows.</p> <p>Development is not reliant on the delivery of a comprehensive surface water strategy and therefore to ensure soundness of the Plan, any reference to this element should at least be qualified such that any contributions should be proportionate, reasonable and directly related to the development, or might indeed on reflection, not be included in the Plan.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>In summary, Hallam Land Management supports the allocation of Land at North End, Yatton within the Site Allocations Plan and more generally, supports the approach taken by the Council to assess and identify Yatton, as one of a range of sustainable settlements capable of accommodating growth required to meet the pressing market and housing needs of the District. The approach adopted by North Somerset Council is supported by the Sustainability Appraisal, including in its assessment of cumulative effects.</p>
North Somerset Internal Drainage Board (Simon Bunn)		16130337//27	<p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p>
Cadplan		3897665//5	<p>Unsuitable for major residential development due to inadequate highway network which would overload routes through Yatton and through Clevedon en route to the M5</p>

Section**Arnolds Way, (Phase 2) Yatton**

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//28	A higher level of surface water attenuation will be required that could impact on plot capacity.
Bloor Homes	-	3399393//2	<p>The Site Allocations Proposals Map correctly identifies the extent of phases 1 and 2 at Arnolds Way, Yatton. However, as the school will now be delivered as part of phase 2 (to provide potential for a larger and more suitable site), the land identified for the school needs to be amended on the Proposals Map (currently shown to be within phase 1) to reflect the Councils approved proposals. Please refer to the concept plan as set out in appendix 2 for the revised location of the school as per the approved (subject to completing the section 106) phase 2 scheme.</p> <p>Site plans attached.</p>

Section Land to the east of Wolvershill Road, Banwell

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//29	<p data-bbox="673 488 1422 521">Outside Board's district but will drain into the Board's district.</p> <p data-bbox="673 555 1414 622">Significant drainage issues in downstream catchment, development should contribute to reducing existing flood risk.</p> <p data-bbox="673 656 1433 723">A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p data-bbox="673 757 1441 824">Development will be expected to contribute to reducing existing flood risk.</p> <p data-bbox="673 857 1430 891">This should be noted in the 'Site specific details/notes' column.</p>

Section

Moor Road, Yatton

Name	Organisation	Comment ID	Comment Recieved
Environment Agency	Environment Agency	1020673//9	<p>Moor Road, Yatton</p> <p>Development also close to Tickenham, Nailsea and Kenn Moors SSSI. This could impact adversely on the SSSI condition. This development could result in SSSI being impacted on both its south and north east sides by proposed development in the site allocation plan. The rhynes and ditches have high ecological value here and need to be protected in terms of water quality, disturbance and continuity of habitat.</p>
Historic England (R Torkildsen)	Historic England	12476353//2	<p>Special regard must be given to desirability of preserving the setting of Grange Farm, a Grade II Listed Building in the exercise of S66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Perhaps the Plan might set out the key design principles and development limitations to ensure its setting is safeguarded to avoid any unrealistic and undeliverable housing figure (capacity).</p> <p>It is apparent that this, and perhaps other allocations in the Plan, will/may affect the significance of heritage assets and that to mitigate and minimise harm to an acceptable extent it will be important that key design conditions are referenced within the Local Plan mindful of the advice in the PPG at Paragraph: 010 ID: 12-010-20140306010 “<i>Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions)</i>”.</p>
Ann H		14811617//1	<p>I am writing regarding the Moor Road, Yatton site, reference HE 1442 on the CC14-Site-Allocations-Plan-SA-Appendix-1-residential-site-assessments for Yatton, and specifically to request the COMPLETE EXCLUSION of The Grange orchard part of the site. My reasons for this are as follows: -</p>

Name	Organisation	Comment ID	Comment Recieved
			<ul style="list-style-type: none"> • The orchard forms part of the gateway to the village as you approach Yatton across the moors. • It is the old and historic remnant orchard adjacent to and associated with the Grade II listed building The Grange. In the recent case of The Forest of Dean v Secretary of State and Gladman, the courts have clearly laid out the principal of limiting development next to a Grade II listed building. This overrides the 5 year supply for houses, and makes a very good case for removing the orchard from the Site Allocation Plan. • The Orchard is home to a very rare fungus, Orchard Tooth Fungus. This is the ONLY case ever found in North Somerset. This fungus only lives on very old apple trees. Kew Gardens, The Mycology Society and various other organizations have advised that NONE of the trees should be removed and that building around or near the trees would alter the ecological environment the fungus needs to survive. • The Orchard is about 6 metres from the Kenn Moor SSSI site on the other side of the road. The Stowey Rhyne flows through there then to the orchard so it would be reasonable to assume that they share the ecological richness and species that makes this SSSI so important. Proximity to a SSSI site was a major contributing factor to HE 1417 & HE 14350 sites in the above-mentioned document in Yatton being excluded from the SAP. These criteria should also be applied to the orchard to maintain consistency. The SSSI site is NOT even mentioned on the Moor Road site • Also NOT mentioned was the similarity in HE 14186, HE 14348 & HE 14350:- “NO. Intrusion into countryside . Potential to increase congestion in High St”. Again, nothing mentioned for the Moor Road site HE 1442 which these would equally apply to. • Lesser and Greater Horseshoe bats use the orchard for foraging and have been confirmed to be using The Grange and its out buildings for roosting. • This site is outside the village boundary.

Name	Organisation	Comment ID	Comment Received
			<ul style="list-style-type: none"> • At the October Executive Meeting of North Somerset Council, the leader Nigel Ashton, stated that he thought The Orchard should be removed from the SAP as it was a very sensitive site, unsuitable for development and access though it was also unsuitable. • At the same meeting Elfan App Rees stated that he would be happy to say no houses on The Orchard part of the site but it would have to remain as access to the training pitch part of the site. He stated that he couldn't remove the orchard altogether or the developer might appeal... • This is a step in the right direction but The Orchard should be removed from the SAP completely, and should become a Local Wildlife Site. • Although North Somerset Council are fully aware, they seem to be disregarding the ecology, historic nature, location and uniqueness of this site. <p>The training pitches part of the site should be allocated as a Local Green Space</p> <ul style="list-style-type: none"> • There is a deficit of green space at North End, Yatton. It seems that there has been no consideration for the 100's of children that now have travel outside the village to train and get exercise, this goes against everything that we should be promoting – developer lead housing developments over the health of many when there are many other areas of land which is far more sustainable, that could be used to make up the housing numbers in North Somerset. <p>I would like to stress that I am not against development. However, I am asking that the criteria for deciding where development goes would be consistently applied and all the circumstances be considered.</p> <p>I also think that Yatton has taken more than its fair share of development and its now time to protect some of the green space around Yatton from unnecessary, unsustainable development.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>I believe that with a consistent approach to the sites that the Moor Road site, but particularly The Orchard, should be removed from the SAP.</p>
Ann H		14811617//2	<p>I am writing regarding the Moor Road, Yatton site, reference HE 1442 on the CC14-Site- Allocations-Plan-SA-Appendix-1-residential-site assessments for Yatton, and specifically to request the COMPLETE EXCLUSION of The Grange orchard part of the site. My reasons for this are as follows: -</p> <ul style="list-style-type: none"> • The orchard forms part of the gateway to the village as you approach Yatton across the moors. • It is the old and historic remnant orchard adjacent to and associated with the Grade II listed building The Grange. In the recent case of The Forest of Dean v Secretary of State and Gladman, the courts have clearly laid out the principal of limiting development next to a Grade II listed building. This overrides the 5 year supply for houses, and makes a very good case for removing the orchard from the Site Allocation Plan. • The Orchard is home to a very rare fungus, Orchard Tooth Fungus. This is the ONLY case ever found in North Somerset. This fungus only lives on very old apple trees. Kew Gardens, The Mycology Society and various other organizations have advised that NONE of the trees should be removed and that building around or near the trees would alter the ecological environment the fungus needs to survive. • The Orchard is about 6 metres from the Kenn Moor SSSI site on the other side of the road. The Stowey Rhyne flows through there then to the orchard so it would be reasonable to assume that they share the ecological richness and species that makes this SSSI so important. Proximity to a SSSI site was a major contributing factor to HE 1417 & HE 14350 sites in the above-mentioned document in Yatton being excluded from the SAP. These criteria should also be applied to the orchard to maintain consistency. The SSSI site is NOT even mentioned on the Moor Road site • Also NOT mentioned was the similarity in HE 14186, HE 14348 & HE 14350:- “NO. Intrusion into countryside . Potential to increase congestion in High St”. Again, nothing mentioned for the Moor

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			<p>Road site HE 1442 which these would equally apply to.</p> <ul style="list-style-type: none"> • Lesser and Greater Horseshoe bats use the orchard for foraging and have been confirmed to be using The Grange and its out buildings for roosting. • This site is outside the village boundary. • At the October Executive Meeting of North Somerset Council, the leader Nigel Ashton, stated that he thought The Orchard should be removed from the SAP as it was a very sensitive site, unsuitable for development and access though it was also unsuitable. • At the same meeting Elfan App Rees stated that he would be happy to say no houses on The Orchard part of the site but it would have to remain as access to the training pitch part of the site. He stated that he couldn't remove the orchard altogether or the developer might appeal... • This is a step in the right direction but The Orchard should be removed from the SAP completely, and should become a Local Wildlife Site. • Although North Somerset Council are fully aware, they seem to be disregarding the ecology, historic nature, location and uniqueness of this site. <p>The training pitches part of the site should be allocated as a Local Green Space</p> <ul style="list-style-type: none"> • There is a deficit of green space at North End, Yatton. It seems that there has been no consideration for the 100's of children that now have travel outside the village to train and get exercise, this goes against everything that we should be promoting – developer lead housing developments over the health of many when there are many other areas of land which is far more sustainable, that could be used to make up the housing numbers in North Somerset. <p>I would like to stress that I am not against development. However, I am asking that the criteria for deciding where development goes would be consistently applied and all the circumstances be considered.</p> <p>I also think that Yatton has taken more than its fair share of development and its now time to protect some of the green space around Yatton from unnecessary, unsustainable development.</p>

Name	Organisation	Comment ID	Comment Received
			<p>I believe that with a consistent approach to the sites that the Moor Road site, but particularly The Orchard, should be removed from the SAP.</p>
Eric Sewell		14813281//1	<p>A Full Planning Application (16/P/0888/F) for the site was submitted in April 2016 and is currently being considered by NSC.</p> <p>This land is outside the village boundary of Yatton, consisting of two adjacent fields. North Somerset Council (NSC) has identified the North East corner of the land as a Flood Zone 3a tidal risk. Development on the land would be unsympathetic to the Village edge and would damage the visual character of an important Gateway approach to Yatton. Recent hedgerow laying/clearing on the site has exposed the landscape views that would be lost if this land was developed. Great importance is now given by the Planning Inspectorate and the Minister to protecting and enhancing valued landscapes.</p> <p>The proposed access to the land off Moor Road a narrow single track unlit country lane is dangerous. It was described by the leader of NSC as 'totally inadequate and inappropriate' (NSC Executive meeting 18 Oct 2016)</p> <p>The first field is an old remnant Orchard which originally formed part of 'The Grange' a Grade II listed building on Moor Road. The Orchard was described by NSC Principal Planning Officer as 'remote from the Village Centre' following a Consultation for Affordable Housing in 2010. If developed would generate more traffic and pollution in Yatton.</p> <p>The Orchard, its fruit trees and hedgerows support a wide diversity of ecology and wildlife. A rare Orchard Tooth Fungus (<i>Sarcodontia Crocea</i>) believed to be the first case in North Somerset has been identified on one of the trees. The Orchard is only a few feet from a Site of Special Scientific Interest (SSSI) on Yatton Moor. Various species of Bat's have been identified in the Orchard and 'The Grange'. English Nature and Yatton & Congresbury Wildlife Action Group (YACWAG) both consider the Orchard as a delicate haven for Wildlife. The Orchard should not be ruined and lost forever by insensitively located and unnecessary development. These facts were ignored by NSC during the preparation of the SAP.</p>

Name	Organisation	Comment ID	Comment Received
			<p>In the latest version of the SAP, NSC has acknowledged the ecological sensitivities of the Orchard by amending the SAP and removing 23 houses originally planned for the Orchard land. The amendment also included a statement that an access road, and presumably footpaths and lighting, could be built through the Orchard site to provide access to the second field to build 60 homes on land that has been used as Rugby Training Pitches for the last eight years. The proposal that an access road could be built through the Orchard would still have a detrimental and damaging effect on the sensitive site. Perhaps now is the time to give the Orchard some protection as a Local Wildlife Site or Local Green Space</p> <p>The second field is adjacent to Yatton Rugby Football Club (YRFC) who in January 2008 leased the land and, turned pasture in to a standard suitable for playing Rugby.</p> <p>Eight consecutive years YRFC have been renting this training facility has proved to be very successful, attracting many young people every week from Yatton and surrounding villages giving them the opportunity to exercise in fresh air and develop their Rugby skills. Neither the land owner nor the Developer has found suitable replacement land for YRFC to use as training pitches. The latest amendment to the SAP still states the land owner/developer must find suitable replacement land.</p> <p>Following a pre-application consultation meeting between NSC Planners & the applicant, NSC Planners advised that the Council's initial assessment of the proposal (March 2015) was that any forthcoming application would be recommended for Refusal. It's puzzling that NSC still felt it appropriate to allocate the site to the SAP.</p> <p>This land should never have been included in the SAP. Building on training pitches and a delicate wildlife site is bad planning. NSC should stick to their initial assessment and refuse any application on this site.</p> <p>I understand that a long overdue North Somerset Council working party has been set up to review the Greenbelt in North Somerset. The poor quality land near Long Ashton known as 'The 'Vale' should be considered very closely. It could easily provide the space for a large number of sustainable homes. The South Bristol Link Road already under construction (on greenbelt land) near the area would provide all the benefits of the Metro Bus, and ideas for a new</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>local railway station on the WSM-Bristol line would together, benefit both new and existing residents across North Somerset and South west Bristol. It could also provide a very large reduction in CO² emissions and pollution through reduced car journeys if building plans in Banwell-Churchill-Nailsea-Congresbury-Backwell and Sandford were reduced in numbers or scrapped.</p>
Tony moulin		14823361//2	<p>In relation to Nature Conservation and the NPPF requirement to conserve and enhance the natural environment the SAP is not totally effective and consistent with the need to deliver sustainable development.</p> <p>NPPF paragraph 165 states that planning policies should be based on "up to date information about the natural environment". Paragraph 166 also refers to the requirement for other environmental assessments including the Habitats Regulation in relation to important sites. In North Somerset, for example, this would be extremely relevant to the North Somerset and Mendip Bat SAC. In both respects it is lamentable that Main Modification MM9 policy DM8 Nature Conservation states that NSC are still only "looking into" producing detailed guidance for the SAC despite the fact that the need for supplementary planning guidance was first "considered" with NE some two years ago.</p> <p>Up to date information is essential for understanding local ecological networks, determining wildlife corridors and identifying opportunities for habitat restoration and creation (NPPF para. 117). It will be difficult for the plan to "objectively assess needs" in order to appropriately mitigate for the loss and improvement of biodiversity without this supplementary guidance. At best the plan will result in an ad hoc, fragmented approach rather than one on a landscape basis for a significant local, regional, national and international species such as the Greater Horseshoe bat.</p> <p>The above general comments are relevant to a remnant orchard adjacent to the Grange, Kenn Moor Road, Yatton. This piece of land outside the settlement boundary has rightly been excluded from the site allocation for housing development. It is significant in ecological, historic and cultural terms and is worthy of designation as a Local Wildlife site (LWS) being regarded a S41 habitat and used by commuting and foraging bats including the Greater Horseshoe bat. I understand, however, that NSC's protocol for</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>determining Wildlife Sites lapsed some years ago. The criteria developed for such sites was a useful assessment tool in determining ecological value. The land should be set aside at least as mitigation as a wildlife corridor and as a buffer zone to the adjacent proposed site housing allocation.</p>
Viv Tomkinson	Congresbury Residents Association Group	15569185//9	<p>I wish to submit the following comments in respect of the Sites Allocation Plan Consultation My comments relate to the Moor Road site in Yatton which is listed to be for potential development of 60 homes. The issue is the access to the site which as currently proposed would be through The Orchard. This is unacceptable .</p> <p>The site is within 6 metres of a SSSI and if allowed would completely destroy the sole rural access route to Yatton. Yatton is still designated as a service village and if this is to be preserved, NSC must not allow the rural access route to the village to be lost. What is currently a peaceful and tranquil location will be completely destroyed. So you need to think again!!</p> <p>As was clear from the discussion at the NSC Executive Committee meeting in October 2016, this site is not suitable for development, but then allowing it to be used for the purpose of an access road is gamesmanship on the part of Executive Councillors. The objective to deliver a target number of house is being applied without any coherent policy framework. What is the difference between allowing the site to be used for development and allowing it to be used for an access road?? Either use will destroy the site - so no development of any nature should be allowed on The Orchard.</p> <p>The fact that the proposed access via The Orchard to allow Yatton to absorb 60 houses is shortsighted and a flagrant abuse of powers on the part of some NSC Councillors who seek to protect their own constituencies from development and appear to have determined that be Yatton be sacrificed as a service village to absorb housing development to resolve the shortfall facing NSC with complete disregard of the consequences. BUT having already granted so many new homes to be built in Yatton, NSC should be making a stand in respect of the Moor Road site and saying that it is not a site for inclusion in the SAP until access can be agreed via the Yatton High Street. There needs to be a coherent plan agreed between Yatton Rugby Club, the Parish Council, NSC and</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>any potential developer. NSC should not be subservient to the profit making ambitions of Persimmon Homes.</p> <p>There are alternative sites within Yatton which could be added to the SAP to compensate for the loss of the Moor Road site: for example Titan Ladders factory site - so rule out the Moor Road site completely from the SAP.</p>
Natural England (Charles Routh)	Natural England	15687777//1	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our core remit includes biodiversity and protected species, geodiversity, landscape character and quality, greenspace, access to the countryside and other greenspace, soil conservation and environmental land management.</p> <p>Moor Road, Yatton</p> <p>Since the previous iteration of this plan, this site has come forward as a planning application. From the information supplied as part of the application process it has become evident that the site is highly sensitive in terms of SAC related bats and a particularly rare fungus. It seems unproven and unlikely that the quanta proposed together with the access proposals to the site could be delivered whilst maintaining these features. Moreover, the features impacted appear to be very hard to compensate for (for either legal and/or ecological reasons). We therefore advise, based on current evidence, that the inclusion of this allocation would render the plan unsound. Specifically, it would not be justified (given the evidence of impacts), nor deliverable (given the HRA mitigation requirements of the importance of the site for bats), nor consistent with national policy (para 117: planning policies should... promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations and para 109 The planning system should contribute to and enhance the natural and local environment by... minimising impacts on biodiversity and providing net gains in biodiversity where possible).</p> <p>We would welcome discussions to establish whether there are ways of demonstrating that this policy could be delivered</p>

Name	Organisation	Comment ID	Comment Recieved
			without adverse effect, or what modifications to the policy (including deletion) might be required to render it sound.
No Moor Development (Yatton)	No Moor Development	16100417//4	<p data-bbox="722 488 975 517">Moor Road, Yatton</p> <p data-bbox="722 555 1449 689">There are a significant number of material constraints on this site and any development would significantly and demonstrably outweigh any benefit additional housing would bring.</p> <p data-bbox="722 728 1453 936">We note that the March 2015 decision of the pre-application planning consultation was that the Council's "<i>initial assessment of [the Persimmon] proposal is that any forthcoming application will be recommended for refusal</i>". It is therefore puzzling that NSC still feels it is appropriate to allocate this site to the SAP.</p> <p data-bbox="722 974 1437 1070">The way 'sustainability' criteria have been applied to the potential residential sites in Yatton put forward by developers and landowners is <u>selective</u> to say the least:</p> <p data-bbox="722 1108 1422 1279">For example, while '<i>proximity</i>' to an SSSI or to '<i>a wildlife site</i>' are given as reasons not to allocate certain green field sites - this is not considered for the site in question, despite the location of the Kenn Moor SSSI literally a few metres from the allocated site.</p> <p data-bbox="722 1317 1433 1451">We are very concerned about the impact of the proposed development on this important SSSI and the contribution of the smaller, easterly field at the site (the orchard) to both landscape and nature conservation.</p> <p data-bbox="722 1489 1453 1592">The site is linked visually with the surrounding countryside, a Yatton and Congresbury Wildlife Action Group (YACWAG) nature reserve and the Kenn Moor SSSI.</p> <p data-bbox="722 1630 1414 1800">How is it that '<i>access via High St</i>', and the '<i>potential to increase congestion in High St</i>' seemingly do not apply to Moor Road? Moreover, should Yatton RFC be forced to move further from the heart of the village, this will self-evidently add to congestion on match days.</p> <p data-bbox="722 1839 1437 1942">Likewise, the approach into Yatton is a key gateway into the village and the any residential development would unacceptably compromise the rural setting of this site which</p>

Name	Organisation	Comment ID	Comment Received
			<p>is a distinctive feature on the edge of the village settlement. This does not warrant a mention in the sustainability criteria.</p> <p>After the application for full planning permission was submitted in March 2016, it became clear that Persimmon had used the questionable allocation of this land in the Site Allocations Plan to 'wash their hands' of their obligations to find a replacement site for the junior section of Yatton RFC. Sport England has objected to the application.</p> <p>The latest amendment to this allocation put forward by the Executive Member for Planning at the NSC Executive Committee (18 October 2016) has the whiff of pre-determination about it. The argument that the Grange orchard is worthy of protection, but then permitting it to be traversed for the purpose of an access road is pure folly and is not supported by the Leader of NSC. The Grange orchard should be protected from residential development in perpetuity.</p> <p>The situation in Yatton is fluid, with other more suitable unallocated sites emerging: the adjacent rugby club land; the soon-to-be-vacated UTC site in Claverham, identified in the draft Neighbourhood Plan as a brownfield site with the capacity for around 80 houses; not to mention the Titan Ladders site which is being marketed for residential development. These sites would compensate removal of the Grange orchard - and secure the former training pitches as Local Green Space and still meet planned housing levels in the parish.</p>
Judith Cockram		16127713//1	<p>Your assessment of its heritage, biodiversity and landscape as AMBER is flawed.</p> <p>Part of this site is an ancient orchard in the curtilage of a Grade 2 listed building. It not only provides summer roosts for Greater Horseshoe bats but also is home to an exceptionally rare fungus, The orchard tooth fungus, the only known example in the whole of North Somerset. It is also close to a SSSI with which it shares the environmentally important Stowey Rhyne.</p> <p>The approach to Yatton across the Moor has views over the Orchard towards the old farmhouse and its barns providing a stunning gateway to the village.</p>

Name	Organisation	Comment ID	Comment Recieved
			Although it is now only recommended as the site of an access road, this is unacceptable for all the above reasons plus the egress onto the Kenn Moor Road is dangerous especially with the parked cars from commuters using the station
North Somerset Internal Drainage Board (Simon Bunn)		16130337//30	<p>Significant drainage issues in downstream catchment, development should contribute to reducing existing flood risk.</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>Development will be expected to contribute to reducing existing flood risk.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>
Yatton Parish Council	Yatton Parish Council	3106433//1	<p>The allocation of the Junior Rugby ground and Grange Orchard (60 proposed houses) should be removed. These areas should be designated as a Local Green Space (The Orchard) and Local Green Space – Rugby Club, including training pitches junior and senior. The Site Allocations Plan supports the reasons for doing this.</p> <p>If the Moor Road (Grange) Site is not removed in part or in full as a site for housing development then it is key that the access to this site is not from Moor Road, as this would create a dangerous junction, and furthermore, we do not accept the statement in the Allocations Plan that access to the site should be through the Orchard, which contains rare and protected species. It is vital that these issues are addressed before any proposal for the Grange site is considered. Any access to this site should come from the B3133. The comments on the map regarding the access road to this site being from Moor Road need to be removed.</p>
Persimmon Homes Severn Valley	-	3361153//8	There are two site specific matters which need to be resolved in respect of the proposed allocation at Moor Road, Yatton. These concern the presence of the rare orchard tooth fungus in one of the trees in the former orchard on the site and the need to replace or relocate the former Junior Rugby pitches on another part of the site.

Name	Organisation	Comment ID	Comment Recieved
			<p>Negotiations continue with the Council and Sport England on the replacement pitches issue. However we are concerned that in relation to the orchard, executive committee on the 18th October made a political decision, completely unsupported by evidence, to delete any development in the orchard apart from access and reduce the number of dwellings from 80 to 60. We consider this is not supported by evidence.</p> <p>Both these matters are being pursued and will be resolved through the planning application process. It is not appropriate for the Site Allocations Plan to prejudge how these issues will be resolved and whilst the playing field issue is expressed in a neutral way in the policy, the proposed amendment relating to the orchard clearly now prejudices that the only solution to the protection of the fungus is to prevent development in the orchard. This is not a matter for the SAP to resolve but the plan does need amending so that it can be resolved through the development management process by replacing ‘no development in the orchard apart from the access road’ with:</p> <p><i>‘Development should take appropriate measures to protect the existence of the orchard tooth fungus’.</i></p> <p>Having summarised our overall position above, that these are matters that should be resolved through the development management process, we have nevertheless set out some more detailed background information below.</p> <p>The identification of the orchard tooth fungus within the area described as the derelict orchard undoubtedly presents a constraint to development. The developer has amended their site layout to ensure the retention of several of the existing orchard trees and has proposed to plant new trees. At present this ‘orchard’ area, comprises 5 mature apple trees in various states of decay. The application therefore presents an opportunity to extend the life of the orchard through the planting of new trees. With so few trees currently present within the orchard the long term survival of the Sarcodontia fungus at this site is already in jeopardy. At least one of the trees within the derelict orchard was already lost to storms over the course of surveys in 2014 and 2015.</p> <p>Initial discussions have been held with the Arboricultural consultant advising Persimmon Homes to consider translocation of some of the other existing orchard trees to further extend the maturity of planting within the new orchard area. As the fungus feeds on dead heartwood, trees must be of</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>sufficient maturity to develop dead heart wood. As such the translocation of some of the existing orchard trees would serve as further mitigation.</p> <p>The development also provides opportunities to bring the management of the retained orchard trees into an ecological driven management plan that can help to ensure the long-term survival of the tree and the fungus within. It is considered possible that without active management of the trees that within 20 years all of the existing apple trees within this field will have been lost. This development provides an opportunity to retain and safeguard part of the remnant orchard and thus is an opportunity that should be taken.</p> <p>I would note that NE comments highlight that the conditions of the tree will be changed fundamentally by the development. It is acknowledged that the context of the trees will be different within the developed site, however there is no current evidence or understanding over how best to manage trees for this species. Certainly the context, in terms of moisture, sunlight etc will have an impact upon this tree. However the orchard tree is being retained within a continuous area of new orchard planting within the corner of this site. This area can be thoroughly protected from damage during construction and can become a feature of the new housing estate.</p> <p>The trees in the orchard were surveyed four times between 2014 and 2015 no evidence was found at any fungus in any of the other trees on the site.</p> <p>We note that the site specific details say '<i>replacement/ relocation of rugby playing pitches</i>'. This comment relates to part of the proposed allocation. In addressing this issue, the particular circumstances of the land need to be taken into account. The field is owned by Childrens Hospice South West, who were donated the land in 2007 through a legacy, in order to '<i>help alleviate the suffering of children, many of whom are too young to understand what is happening to them,</i>' by promoting the development of the land to benefit the life-limited children using the trust facility at Charlton Farm, also in North Somerset. To achieve that the hospice entered into an option with Persimmon Homes Severn Valley in 2014 and a there is currently an undetermined planning application for residential development on the land.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>Yatton Rugby Club asked the hospice for permission to use the field on a temporary basis, which formally ceased at the end of the 2015-2016 rugby season. During the time the rugby club have used the area, the hospice have liaised regularly with them to keep them informed of their intentions and to enable them to find a replacement facility, which the rugby club are now doing.</p> <p>The use of the field by the rugby club has now ceased, there was never any planning permission in place for a formal change of use of the land and the field has no facilities.</p> <p>Therefore if there is any requirement to replace the temporary playing facility on this land, it is the responsibility of the rugby club who we understand are currently discussing a proposed alternative with the Council.</p> <p>Persimmon Homes Severn Valley control the proposed allocation site at Moor Road, Yatton, which is also subject to planning application at 16/P/0888/F.</p> <p>The Council propose a change to the original entry in Schedule 1 from <i>'access off Moor Road'</i> to <i>'no development in the orchard apart from access road'</i> and the reduction in the capacity from 80 to 60 dwellings. We note from the consultation statement, page 51, that this changes arises from a political decision by members, at the Executive Committee on the 18th October 2016.</p> <p>The change was not proposed by officers in the list of changes set out in the Committee Report (page 9). We note that the minutes refer to the ecologically sensitive nature of the orchard and Grange Farm site and the impact of any development on the Grade II listed building. Reference was also made to the landscape impact of developing this site which provided the gateway in to Yatton. Whilst a request was made to remove this site from the Site Allocations Plan, the Executive Committee did not accept this and agreed the amendment to reduce the numbers from 80 to 60 with no development on the orchard other than for access. All of this is completely without any evidential support, and is not supported by the evidence submitted with the planning application which includes a heritage assessment, ecological survey and landscape and visual assessment. Clarkson and Woods, Ecological Consultants appointed by Persimmon Homes Severn Valley responded separately to the issues relating to the orchard as follows:</p>

Name	Organisation	Comment ID	Comment Recieved
			<p><i>‘We also note that Natural England in their further response in October 2016 confirm their previous view which is supported by Clarkson and Woods that as “there is no current evidence or understanding over how best to manage tree species” that a precautionary approach should be maintained, that Natural England welcome the proposed creation of a new orchard as part of the development proposals, but that planting should be centred on the tree which now hosts the fungus, but which was not present in any of the trees when the application was submitted</i></p>
Cadplan		3897665//6	<p>serious road safety & low lying land (flooding) issues, impact on character of the open area, urban sprawl</p>

Section

Total for Service Villages

Name	Organisation	Comment ID	Comment Recieved
Environment Agency	Environment Agency	1020673//6	<p>Congresbury</p> <p>The Environment Agency are potentially seeking financial contributions for managing the flood risk on the Congresbury Yeo catchment. Developments in the Congresbury area will potentially increase runoff into the Congresbury Yeo catchment putting additional pressure on this length of watercourse.</p> <p>Yatton, Winscombe and Langford</p> <p>Surface water schemes should reduce the rate of runoff and volume from these sites to avoid increasing flows in these non-main river watercourses which ultimately drain into main rivers. Yatton in particular, the Internal Drainage Board watercourses are under pressure and land is already hard to drain</p>
Highways Agency (S Walsh)		8141345//9	<p><u>Service Villages</u></p> <p>The service villages have a proposed capacity of 1,255 dwellings, 1.61 hectares for proposed employment sites and 27.5 hectares for safeguarded employment sites. These developments have full planning consent for 215 dwellings remaining capacity, and outline planning permission for 616 dwellings. Some of the development sites are in close proximity to the SRN and could therefore have implications for its operation. An evidence base will need to be presented to consider the influences at the SRN and the need for any supporting/mitigation measures.</p>

Section**Bleadon Quarry, Bleadon***

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//31	<p>Close to the Axe Brue Drainage Board's district and drains into the district.</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>

Section**Total for Infill Villages**

Name	Organisation	Comment ID	Comment Recieved
Highways Agency (S Walsh)		8141345//10	<u>Infill Villages</u> The infill villages' development sites have a proposed capacity of 62 dwellings and 2.2 hectares for safeguarded employment sites. The development proposals are in villages and are smaller in size than those proposed elsewhere. For this reason, while Highways England is less concerned with these proposals, an evidence base will still need to be presented to consider the influences at the SRN and the need for any supporting measures.

Section

Barrow Hospital, Barrow Gurney

Name	Organisation	Comment ID	Comment Received
CSJ Planning (Ben Larcombe)	CSJ Planning Consultants Ltd	14574657//1	<p>North Somerset Council – Policy Representations on the Site Allocations Plan 2006-2026: Publication Version (November 2016)</p> <p>Former Barrow Hospital, Wild Country Lane, Barrow Gurney</p> <p>Policy SA1: Housing</p> <p>Policy SA1 states that residential sites of 10 or more units are shown on the Policies Map and set out at Schedule 1 together with any specific site-related requirements or key considerations to take into account. Schedule 1, under the heading of ‘Other Settlements and Countryside’ includes Barrow Hospital as a site for residential development within the Plan period.</p> <p>This allocation is restricted to the red-line boundary of application ref: 13/P/0749/RM and excludes the remainder of the former Barrow Hospital site which was previously allocated (RD/4) as a ‘Major Development Site in the Green Belt’ within the 2007 Replacement Local Plan. (See attachment)</p> <p>It is noted that Schedule 1 references the delivery of 35 No. market dwellings noted from 13/P/0749/RM, which is incorrect. Consent was granted for 43 No. dwellings and these are now in the process of being built-out and occupied. Schedule 1 therefore requires amendment to ensure the correct number of dwellings is referenced.</p> <p>The Site Allocations include for 124 No. care units at Redwood Lodge, Failand, approximately two miles from the former Barrow Hospital site. The former Barrow Hospital site has an extant consent for the delivery of a residential care village, although there may be limited scope for the delivery of two residential care homes within a two mile radius of each other, no explanation of the deletion of the bulk of the site is provided. Works have commenced on the delivery of the Redwood Lodge facility and as such, the remainder of the Barrow Hospital site should be released for the delivery of residential development.</p> <p>Taking into account NPPF89, there is no logical or sound rationale for the deletion of the existing 2007 Local Plan allocation as a ‘Major Development Site in the Green Belt’. National Planning Policy Framework (NPPF) paragraph</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>182 requires that Local Plans should be prepared in accordance with National Planning Policy, if their content is to be considered sound. Chapter 9 of the NPPF, paras 79-92 inclusive, refer to the protection of Green Belt land. Para 89 specifically relates to the construction of new buildings in the Green Belt. It lists exceptions in which development in the Green Belt is considered appropriate. The sixth exception relates to the infilling, partial, or the complete redevelopment of brownfield sites in the Green Belt and states the following:</p> <p>A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are</p> <p>"Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt, and the purpose of including land within it than the existing development".</p> <p>It is clear that redevelopment of previously developed Green Belt sites can be classified as an exception in which development in the Green Belt can be considered appropriate, so long as there is no greater impact on the openness of the Green Belt. The vast majority of the site is well screened by woodland and it is entirely feasible to design a scheme that does not injure the openness. The former Barrow Hospital site is evidently brownfield land and the provisions of NPPF para 89(6) make it clear that the redevelopment of the site would not constitute inappropriate development.</p> <p>The evidence in support of the redevelopment of the site is contained within the relevant expert reports which have been submitted in support of live application refs: 15/P/2301/F and 15/P/2302/F to deliver a total of 80 No. dwellings.</p> <p>In conclusion, the allocation of the whole former Barrow Hospital site should be reinstated, as per the allocation contained within the 2007 Replacement Local Plan.</p>

Section Weston-super-Mare proposed employment sites

Name	Organisation	Comment ID	Comment Recieved
D. E		15972289//9	<p>I would like to see a significant area of land around the Warne road area of WsM safeguarded for employment uses. I had though this area was already safeguarded but it's not showing on the plans I've seen.</p> <p>This existing employment in Warne road is the only area where there is a range of light industrial uses within easy walking distance of Weston town centre and it provides jobs for the people who live there . Most of the sites being proposed for safeguarded employment use are on the town outskirts and would involve using cars to get there. These sites do not meet the sustainabile communities criteria as well as the Warne road area .</p> <p>North Somerset's core strategy says it is an employment led strategy so i would hope to see existing employment areas like Warne road seen as more important than areas and jobs on the outskirts which do not yet exist .</p> <p>The nearby former Sweat FA site in Winterstoke road was rejected for housing by the Planning Appeal Inspector in 2015 This was on the grounds of retaining land in this vicinity as the town centre employment area. The planning application was FA/9/P/2029/F and the refusal on appeal was APP/DO121/W/15/3004616 . Local residents presented the council with a petition against the loss of employment land in this area when the original planning application for housing was submitted.</p>
North Somerset Internal Drainage Board (Simon Bunn)		16130337//32	Detailed comments on various employment sites in Weston . See attachment

Section

Clevedon proposed employment sites

Name	Organisation	Comment ID	Comment Received
M Stowell		14828417//1	<p>Portbury House, including land now proposed to be removed from the employment allocation, is already allocated as a safeguarded Employment Area under Policy E/5 (and the Schedule to Policy E/5) in the North Somerset Replacement Local Plan (NSRLP) which was adopted in March 2007.</p> <p>The reason given by the lpa for the removal of part of this allocation is the listed building status of the site. However, no evidence has been produced by the lpa to justify the proposed change to adopted policy.</p> <p>We note from the Historic England website that the entry at Portbury House relates to the 'farmhouse and attached stable and barn range'. The property was listed (Grade II) on 22 January 1976. It is, therefore, relevant that the property was already listed when the lpa adopted Policy E/5 of the NSRLP in 2007.</p> <p>We submit that there has been no material change in circumstances since 2007 which would justify the removal of part of an allocation which was found to be sound at that time.</p> <p>It is also relevant that the lpa has in place a policy which safeguards listed buildings. Policy DM4 of the recently adopted Sites and Policies Plan: Part 1 (which replaced Policy ECH/4 of the NSRLP) requires that development will be expected to enhance the character, appearance and special interest of a listed building and its setting. Accordingly, any proposals coming forward at Portbury House will need to comply with Policy DM4.</p> <p>In addition, part of the area now proposed to be removed from the allocation does not fall within the listing which, we submit, relates only to the buildings at the north-west corner of the site. The buildings at the north-east corner of the site comprise a range of modern (including Atcost) farm buildings which do not form part of the listing.</p> <p>In conclusion, we do not consider that the policy is sound on the grounds that the lpa has not demonstrated any material change in circumstances which would justify removing the allocation from that shown in the adopted NSRLP and that there is no need to remove the allocation on the grounds that there are other policies in place which safeguard listed buildings.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>We submit that, in order to make the policy sound, the allocation of land at Portbury House should be re-instated.</p>
<p>North Somerset Internal Drainage Board (Simon Bunn)</p>		<p>16130337//33</p>	<p>Land to the west of Kenn Road</p> <p>Significant drainage issues in downstream catchment, development should contribute to reducing existing flood risk.</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>Development will be expected to contribute to reducing existing flood risk.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>
<p>St Modwen Properties PLC</p>	<p>-</p>	<p>3568545//4</p>	<p>Our previous representations questioned the robustness of the Council's assessment of the existing employment allocation on the land West of Kenn Road, Clevedon. We raised significant concerns regarding the lack of consideration to commercial reality in retaining the allocation and felt that the Council had not assessed the site in accordance with NPPF guidance (notably paragraph 22). We have reviewed the Council's further evidence and comments since the April submissions and our concerns still remain. Key points we wish to add are however:</p> <p>i) We note that the Council's response to the prospect of reallocation to a residential led approach to the site in order to make it viable can be found at page 59 of Appendix 4 of the 18th October Executive Committee Report. In response to our proposal the Council states "<i>Officers would be keen to explore the viability of employment only on this site and to understand any barriers to bringing the site forward</i>". This comment is hugely frustrating and provides no form of justification for not considering the site for alternative uses. There appears to be a fundamental disconnect and lack of understanding of the position on the ground between the Officers preparing the Plan and the Officers dealing with the current application proposals. The residential led application was submitted in July 2016, this followed pre application discussions and a response from the policy team and economic development officers in July/August 2015 who acknowledged the challenges in bringing the site forward. As a result of the discussions the application is</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>supported by a full case including a detailed economic statement demonstrating why the site has not been delivered .</p> <p>ii) When considering the overall balance of employment land in North Somerset it is clear that the employment allocations in Clevedon are disproportionately high, both in terms of new allocations and existing protected sites as shown in Schedule 2 and 3 when compared to Nailsea, Portishead and the combined service villages. This is exacerbated by the fact that the Town has the lowest scale of residential allocations. Therefore a reallocation of the land West of Kenn Road would not provide an imbalance given the significant over provision of existing and proposed employment land already in the Town.</p> <p>iii) The Council’s evidence to support the Publication version of the Plan still fails to justify the level of employment land within Clevedon or the reason for retaining the land West of Kenn Road. Firstly there has been no informed assessment of the Town’s quantitative requirements as a whole. Secondly, the latest background document Employment Allocation Review (November 2016) appears to be another ‘tick box’ exercise and fails to provide any form of detailed analysis of the prospects of the site being delivered. There is no evidence of informed market commentary (either in house or externally) or analysis of why the site has not been delivered over the previous Plan period despite a number of planning permissions on the land. There is no reference to the current planning application on the land and the detailed accompanying submissions which demonstrate why the site is not deliverable for employment, or the pre application or post submission discussions with the planning policy, development control and economic development officers.</p> <p>iv) We note that the Council’s own assessment (November 2016) acknowledges that the site only scores 23 out of 35, the lower end of the medium ranking scale. This is contrary to the Council’s depiction of the site as a ‘prime employment site’ in their response to re-allocation (page 141 in Appendix 4 Committee paper). The Council’s assessment work therefore fails to consider the evidence available and at the very least acknowledge that a residential led mixed use scheme is the only way of delivering employment space in any form on the site.</p>

Section

Nailsea proposed employment sites

Name	Organisation	Comment ID	Comment Recieved
Nailsea Action Group	Nailsea Action Group	14823809//10	<p>Summary</p> <p>To achieve greater self sufficiency Nailsea needs more employment. However, the single allocation on Land at North West Nailsea is inappropriate due to flood risk. We also question the suitability of Nailsea as a suitable location for employment or residential development</p> <p><i>Suitability of Nailsea as a destination for employment development</i></p> <p>None of Nailsea's employment locations have ever thrived due to the poor uptake of the opportunities that they offer. We question Nailsea's suitability as a destination for employment development</p> <ul style="list-style-type: none"> • One of the best located properties faces onto the roundabout at the north end of Lodge Lane. It is best located because it on the edge of town closest to Bristol. It consequently enjoys the best access to Britol of any employment site in Nailsea but dispite this, it is more often than not mainly vacant. • The old cider works has poor access and less than half of it is currently used. • There were employment opportunities at Tavener's Yard in Southfield road but this became run down and, as no company could be found to take it on as an employment site, houses have been built there. • There are many vacant properties on the industrial estate at Blackfriars Road where one of the properties is currently being used for recreational purposes by the very successful Gemini Gym club. • Police station • Conversion of offices in the high street into flats • Conversion of the Fouroaks school site into homes <p>Referenced throughout all the local planning documents that relate to the Sites Allocation Plan is the admission that there are very limited employment opportunities additional to that which already exists. If one of the tenets of the NPPF is that new housing should be employment-led, then this matter does not meet the expectations of the tests of soundness numbers 2 and 4. Moreover the expectation is stated that most new residents in Nailsea will be seeking employment primarily in the greater Bristol area,</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>particularly in the north, which will necessitate travelling almost certainly by car along small roads and lanes through Nailsea which are unsuited to a further increase in traffic flow and density. At one critical road junction in particular (Backwell crossroads), no significant physical mitigation is declared to be possible, and that for several other junctions where traffic congestion and delays as a result of housing development are projected to be lengthy, is unconvincing.</p>
Gleeson Strategic Land	Gleeson Strategic Land	4602593//3	<p>The lack of any new employment designation in or around Nailsea fails to recognise the growth anticipated by the CS or JSP in terms of new residential properties in the town. The Council has failed to acknowledge how land near to the Backwell and Nailsea station could assist in reducing the need to commute and the self-contained nature of the settlement could be enhanced.</p> <p>There is promoted land next to the railway station which would be an excellent location for new commercial uses that would be sustainable in every aspect and enable the continued sustainable growth of Nailsea.</p> <p>The singular drive by both District and Parish Council to deny identification of a sustainable extension to the southern side of Nailsea near to and next to the station is the reason why the Town continues to decline. Despite acknowledging the need for development in the town the lack of delivery is indicative of both Councils inability to accept sustainable change.</p>

Section

Portishead proposed employment site

Name	Organisation	Comment ID	Comment Received
CSJ Planning (Ben Larcombe)	CSJ Planning Consultants Ltd	14574657//2	<p>Harbour Crescent, Serbert Road, Portishead, BS20 7FT</p> <p>Policy SA4: Proposed Employment Sites</p> <p>Policy SA4 states that land in Schedule 2 is allocated for new business development (B1, B2, and B8). Proposals for non B use classes on these sites will be permitted if:</p> <p>They are ancillary to the main B use;</p> <p>They are small scale, making up no more than 15% of the site area overall and provide a supporting service for the employment use or employees e.g. crèche, gym, café etc.</p> <p>Their development would not lead to the site becoming unsuitable for the intended employment uses</p> <p>In case where the above criteria are not met:</p> <p>It can be demonstrated the planned B Blass use is not suitable and that there is no realistic prospect of the site coming forward for its planned use</p> <p>The range and quality of land available to meet future business needs is not adversely impacted</p> <p>National Planning Policy Framework (NPPF) paragraph 182 requires that Local Plans should be prepared in accordance with National Planning Policy, if their content is to be considered sound. Para 22 of the NPPF states that: "Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities".</p> <p>Schedule 2 of the Site Allocations Plan allocates 1.6 Ha of land at 'Gordano Gate', Portishead, as an existing employment site and residual allocation, which is carried on from the 2007 Replacement Local Plan (ref: E4). The continued allocation of</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>this site for employment purposes is both contrary to NPPF para 22 and overlooks the prevailing circumstances of the site. The continued allocation of the site for employment purposes fails to recognise the implementation of Prior Approval ref: 14/P0359/CUPA, nor the evidence base associated with live application ref: 16/P/2066/F (Construction of 93no. residential apartments (C3 use) and office floorspace (B1 use) with associated car parking, landscaping and servicing).</p> <p>The Marketing Report (enclosed) which supports the live application, comprehensively outlines that the site has been vacant and undeveloped since it was vacated (as part of the wider Gordano Gate Business Park) following the sale of the site by the MOD approximately 20 years ago. Despite comprehensive marketing of the Phase 1 buildings and Phase 2 land since the original local developer purchased the site and speculatively developed the Phase 1 buildings in 2007/2008, the various site owners have been unable to identify office/employment occupier or developer interest in the site.</p> <p>There is no formal objection in terms of soundness regarding the wording of Policy SA4 itself, although the continued allocation of 'Gordano Gate' within Schedule 2, as evidenced, is contrary to National Planning Policy and the existing circumstances on site. As such, the retention of 'Gordano Gate' as a protected employment site should be removed from Schedule 2 of the Site Allocations Plan.</p>

Section

Service villages proposed employment sites

Name	Organisation	Comment ID	Comment Received
Wrington Parish Council	Wrington Parish Council	1019201//9	<p>We note that the Burnett Industrial Estate and Havyatt Business Park Wrington have been grouped together although we are not aware of any potential for development at the former, which has a defined physical boundary.</p> <p>It is difficult to see how any extension to the existing built development at the Havyatt Business Park could be justified, bearing in mind the impact on the flood plain and the increased flood risk created directly or by displacement from additional development on this site. Also, any further development would add to what are already significant traffic and transport issues on the narrow village access roads and within the village centre as a result of HGV and other traffic related to the industrial estate/ employment sites.</p> <p>It is recommended that the site boundary is now fixed and revised if necessary to limit it to the existing built structures and the agreed warehouse planning permission. No further development should be permitted on this visually exposed countryside site.</p> <p>It is our understanding that most people who work on these sites drive into Wrington in the morning and home again at night, passing local residents travelling in the opposite direction. This is not sustainable development. A related issue is our understanding that First Bus has recently advised that the A2 bus service is no longer commercially viable. While the service is being funded temporarily by NSC, these employment sites can no longer be considered to be accessible by a reliable public transport service.</p>
North Somerset Internal Drainage Board (Simon Bunn)		16130337//34	<p>Elliott Medway, Congresbury and Park Farm, Yatton</p> <p>Significant drainage issues in downstream catchment, development should contribute to reducing existing flood risk.</p> <p>A higher level of surface water attenuation will be required that could impact on plot capacity.</p> <p>Development will be expected to contribute to reducing existing flood risk.</p> <p>This should be noted in the 'Site specific details/notes' column.</p>

Section**Clevedon safeguarded employment sites**

Name	Organisation	Comment ID	Comment Recieved
Amethyst	Amethyst	15152929//1	<p>Amethyst Planning is instructed by Tesco Stores Ltd to make representations to the emerging North Somerset Local Plan in respect of land it owns adjacent to the existing Tesco store Kenn Road, Clevedon. The site is specifically referred to as 173-175 Kenn Road, North of Tesco in schedule 3 of the documents currently available for public consultation.</p> <p>The site has been identified in the draft Site Allocations Plan as a protected employment site in tandem with the associated policies SA5 and SA6 which seek to protect those sites identified from development falling outside of those recognised employment use classes to which the text of the Policy refers to Use Classes B1, B2 and B8. The site was not previously identified for protection under the North Somerset Replacement Local Plan. It is understood from reviewing the evidence base that a number of previously identified and allocated sites from the NSRLP have in effect been 'carried over' to the new plan on the basis of an employment land review of those sites previously conducted. As the subject site was not previously identified it was not the subject of any such assessment.</p> <p>We understand from conversations with officers of the Council that the identification and subsequent protection of the site has not been informed by a full employment land assessment and that the evidence base for the emerging plan is deficient in this respect. Officers have pointed out that they believe the buildings to be in relatively good condition and in an accessible location. These two criteria correlate with elements of the assessment methodology utilised for reviewing those sites proposed for new employment allocations within the emerging plan but that methodology comprised 12 criteria in total and was therefore much more robust. One of the key factors in assessing any site for a new or continued allocation for employment is invariably its compatibility with adjoining users (as indeed it is with the new sites background paper).</p> <p>It is our view that the identification of the subject site as one protected for employment uses where the evidence base in respect of the subject site is flawed cannot be supported. We feel that the site should remain as an unidentified site within the emerging local plan which would allow for flexibility within the existing parameters of the NPPF and allow for any proposal</p>

Name	Organisation	Comment ID	Comment Received
			<p>for alternative uses of the site to be determined on it's own merits.</p>
Amethyst	Amethyst	15152929//2	<p>Clevedon. The site is specifically referred to as 173-175 Kenn Road, North of Tesco in schedule 3 of the documents currently available for public consultation.</p> <p>The site has been identified in the draft Site Allocations Plan as a protected employment site in tandem with the associated policies SA5 and SA6 which seek to protect those sites identified from development falling outside of those recognised employment use classes to which the text of the Policy refers to Use Classes B1, B2 and B8. The site was not previously identified for protection under the North Somerset Replacement Local Plan. It is understood from reviewing the evidence base that a number of previously identified and allocated sites from the NSRLP have in effect been 'carried over' to the new plan on the basis of an employment land review of those sites previously conducted. As the subject site was not previously identified it was not the subject of any such assessment.</p> <p>We understand from conversations with officers of the Council that the identification and subsequent protection of the site has not been informed by a full employment land assessment and that the evidence base for the emerging plan is deficient in this respect. Officers have pointed out that they believe the buildings to be in relatively good condition and in an accessible location. These two criteria correlate with elements of the assessment methodology utilised for reviewing those sites proposed for new employment allocations within the emerging plan but that methodology comprised 12 criteria in total and was therefore much more robust. One of the key factors in assessing any site for a new or continued allocation for employment is invariably its compatibility with adjoining users (as indeed it is with the new sites background paper).</p> <p>It is our view that the identification of the subject site as one protected for employment uses where the evidence base in respect of the subject site is flawed cannot be supported. We feel that the site should remain as an unidentified site within the emerging local plan which would allow for flexibility within the existing parameters of the NPPF and allow for any proposal for alternative uses of the site to be determined on it's own merits.</p>

Name	Organisation	Comment ID	Comment Recieved
FI Real Estate Management (How Planning)	HOW Planning LLP	16093537//1	<p>I am instructed on behalf of FI Real Estate Management to submit a letter of objection to the identification of Waverley House, Old Church Road, Clevedon as a Safeguarded Employment Site under Policy SA 5. This letter provides the Authority with information which identifies that there is no reasonable prospect that the site will continue in employment use. This is evidenced by way of the appended letter prepared by the agent managing the site, Lambert Smith Hampton (LSH).</p> <p>SITE STATUS</p> <p>The Waverley House site is a vacant purpose built office building with associated car parking and landscaping.</p> <p>PLANNING POLICY</p> <p>Paragraph 22 of the National Planning Policy Framework (NPPF) advises:</p> <p><i>“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed.”</i></p> <p>The draft Site and Policies Plan, Part 2 Site Allocations Plans advises at paragraph 4.32 that “the loss of key existing strategic employment sites would be contrary to Core Strategy objectives”. Whilst FI Real Estate Management note the importance of the protection of strategic employment site, there is no justifiable evidence base which suggests that Waverley House is a strategic employment site. On the contrary the site has been vacant since October 2012, therefore questioning the suitability of this site for employment uses, and the site is surrounded by a variety of non-employment uses. This is an isolated site which neither alone, nor in conjunction with the surrounding land uses, creates a strategically important employment site.</p> <p>The golden thread running through the NPPF is the promotion of sustainable development; this is assessed against the 3 roles of economic, social and environmental. The site’s redevelopment for non-employment uses will comply with these three dimensions. The delivery of housing development, for example, will contribute to employment growth in the housebuilding industry; this will bring new people to the area that in turn will support existing shops and facilities.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>Redeveloping the site will support the needs of local people by providing a mix of house types in a location that is accessible to local amenities. NPPF paragraph 111 stipulates that planning policy (and decisions) should encourage the effective use of land by re-using land that has been previously developed (such as the Waverley House site).</p> <p>The footnote to paragraph 47 of the NPPF identifies that for a site to be considered deliverable, sites should be available now, offer a suitable location for development now, be achievable with a realistic prospect that housing will be delivered on the site within 5 years and that development of the site is viable.</p> <p>FI Real Estate Group’s involvement brings commitment to the delivery of the site which, based upon the marketing information provided by LSH, cannot be solely for employment uses. The site can be progressed in the short term; the site is located in the urban area with good transport links, access to day to day facilities and services (such as schools).</p> <p>ASSESSMENT OF THE SOUNDNESS OF THE SITE AND POLICIES PLAN PART 2 SITE ALLOCATIONS PLAN</p> <p>The Site and Policies Plan Part 2 Site Allocations Plan will be examined by an independent Inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that is:</p> <ul style="list-style-type: none"> • Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; • Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; • Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; • Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF

Name	Organisation	Comment ID	Comment Recieved
			<p>The identification of Waverley House as a safeguarded employment site is not justified as the Authority has not produced any evidence to demonstrate that there is a reasonable prospect for the site being used for employment uses throughout the whole Plan period. The allocation of the site will not be effective, as it cannot be guaranteed that the site will be taken up for employment use, and therefore the Plan does not encourage the effective use of land by effectively sterilising this site from a deliverable use. Finally, the Plan is not consistent with national policy as the NPPF is clear that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.</p> <p>In accordance with paragraph 182 of the NPPF, the allocation of the Waverley House site in the Site and Policies Plan, Part 2 Site Allocations Plan is not sound. As such, the identification of the site as a safeguarded employment site should be removed and the site reinstated as “white land”.</p> <p>I trust this letter of representation provides the Authority with greater clarity on the current status of the site and I would be grateful if you could take account of these representations in your consideration of the of the finalisation of the Site and Policies Plan, Part 2 Site Allocations Plan prior to submission to the Secretary of State of independent examination.</p>

Section**Nailsea safeguarded employment sites**

Name	Organisation	Comment ID	Comment Recieved
Naigalseye		14647553//7	This relatively small hectarage of safeguarded employment coupled with the almost complete unavailability of new employment sites adds further weight to the probability that the majority of new residents will seek employment outside Nailsea. Almost all new housing in Nailsea, therefore, cannot be said to be employment-led in the locality, which is not the expectation of the NPPF nor of the tests of soundness.

Section

Portishead safeguarded employment sites

Name	Organisation	Comment ID	Comment Received
Alder King (M Cullen)		14896737//2	<p data-bbox="639 488 1445 589">OBJECTION TO SAFEGUARDED EMPLOYMENT SITE SA 5 AND SCHEDULE 3 – FORMER COLEMAN BUILDING, SERBERT ROAD, OFF SERBERT WAY, PORTISHEAD.</p> <p data-bbox="639 629 1445 763">I refer to the above and on behalf of my client Addspace Limited OBJECT to the proposed ‘Safeguarded Employment Site’ allocations now proposed in the plan. This is a general objection but is driven by land my client owns on Serbert Way, Portishead.</p> <p data-bbox="639 801 1445 1043">The supporting text to policy SA5 notes that the loss of some poorly located, run down or incompatible sites could be a benefit, but the policy itself does not provide for this. The policy implies that SA5 is protecting 'strategic sites' but it is considered that central Portishead sites do not qualify as strategic, and that the policy, if it is to remain, should be applied to those sites that are genuinely strategic in a regional sense.</p> <p data-bbox="639 1081 1445 1637">The land off Quay’s Avenue/Serbert Way has not been previously protected in this way or allocated to date and was not allocated in the former Replacement Local Plan as a ‘Safeguarded Employment Area’ (Policy E/5). The land is however within the defined settlement boundary of Portishead, occupying a central location where there are strong public transport links and amenities in the surrounding area but also deficiencies in terms of heavy commercial traffic including HGVs and proximity to existing and emerging residential uses. The site also lies in close proximity to the proposed new Portishead railway station and this location, in time, will become even more sustainable. As a result of recent developments and market forces the area surrounding the site has become increasingly less typical ‘B’ Class employment and much more mixed in character including residential. This is leading to concern about operational restrictions being imposed to protect residential amenity.</p> <p data-bbox="639 1675 1445 1984">From a market perspective Portishead is not a preferred office, industrial or distribution location compared with nearby towns such as Avonmouth, Weston-Super-Mare and Bridgwater. There is significant caution in the office sector because of recent past letting difficulties, low rent levels and increased construction costs and the town offers constrained access for heavy goods vehicles via the A369 to Junction 19 of the M5 motorway and as a consequence future industrial and distribution uses are likely to be limited within the town.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>Furthermore, the poor performance of a number of speculative employment schemes undertaken in the town and completed between 2006 and 2008 has unfortunately impacted on the view of commercial developers in relation to their appetite for speculative employment development or building acquisitions in the town. This has left developers and existing landowners concerned about future lettings prospects including extended voids and reduced levels of achievable rents.</p> <p>Whilst demand from smaller scale occupiers may have improved in recent years, this still remains at a relatively limited level and the supply of existing accommodation and employment land is still sufficient to meet any improvement in the market in the future.</p> <p>This does not mean that the existing occupiers of my client's premises have any immediate intention of vacating the existing building or that the building is currently unfit for its current use. However, the restriction being suggested is a wholly unnecessary designation and established generic criteria based policy eg CS20, the principles of paragraph 22 of the National Planning Policy Framework, which states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being maintained for this purpose, and the emerging policy SA6, are more than sufficient to ensure that if there is good reason to do so that existing employment sites can be protected from inappropriate redevelopment.</p> <p>There is of course still a high demand and need for housing (including affordable housing) in Portishead and the site, should it become vacant in the future, is situated in a very sustainable location. This would be a reasonable consideration in the balance against the relevant criteria of the generic policies that already exist.</p> <p>On the basis of the above my client objects to this safeguarded employment site policy SA5 and specifically the Quay's Avenue/ Serbert Way allocation put forward by the Council and request that it is deleted from the plan; the proposals map and from Schedule 5.</p>

Section Service villages safeguarded employment sites

Name	Organisation	Comment ID	Comment Recieved
Cresten Boase		5118977//7	The omission of Slough Pit Farm, Winscombe, is supported.

Section

Backwell

Name	Organisation	Comment ID	Comment Received
Persimmon Homes Severn Valley	-	3361153//15	<p data-bbox="761 488 1082 521">Farleigh Fields, Backwell</p> <p data-bbox="761 555 1461 1077">In assessing the position at Farleigh Fields, Backwell, it is necessary to take account of the recent history and current circumstances relating to the Local Green Space issue. In response to a submitted Neighbourhood Development Plan proposal to allocate all of Farleigh Fields as Local Green Space, the Neighbourhood Plan Examiner concluded the designation amounted to an extensive tract, was contrary to National Policy and therefore failed to meet the Neighbourhood Development Plan Basic Conditions. He also found that National Policy does not suggest that a failure to meet policy requirements should be balanced against other considerations when designating Local Green Space, so that other benefits arising from a Local Green Space designation cannot be used to mitigate against or overcome a failure to meet policy.</p> <p data-bbox="761 1115 1453 1462">He further recognised that there may be benefits in identifying <u>part</u> of the land as Local Green Space and recommended the Parish Council should work with North Somerset Council to establish how this should be dealt with in the development plan. The disappointing aspect of this recommendation is that it fails to recognise the land is in private ownership and despite the encouragement in NPPG about involvement of the landowners there has been no attempt to involve Charles Church Severn Valley in this process.</p> <p data-bbox="761 1500 1461 1776">We note that Backwell Parish Council have resubmitted old evidence which was rejected by the Neighbourhood Plan Examiner relating to the designation of the whole of Farleigh Fields as Local Green Space. This flies in the face of the Examiners Report and is also contrary to the approach adopted by North Somerset Council to propose designation of part of the land as Local Green Space. It should be firmly rejected.</p> <p data-bbox="761 1814 1437 1984">We have set out below some additional points to support this approach. Firstly the Local Green Space assessment carried out by the Parish Council was undertaken in isolation. Therefore it is not in accordance with the NPPF. Paragraph 76 says ‘<i>identifying land as Local</i></p>

Name	Organisation	Comment ID	Comment Received
			<p><i>Green Space should therefore be consistent with the Local Planning of Sustainable Development and complement investment in sufficient homes, jobs and other essential services.'</i></p> <p>The sustainability and settlement hierarchy background documents confirm our view expressed at the Backwell Neighbourhood Plan Examination that Backwell is the most sustainable of the Service Villages and that development in Backwell will be consistent with advice in the NPPF.</p> <p>The Neighbourhood Plan assessment sought to demonstrate that Farleigh Fields is valuable for both agricultural and recreational purposes. However, the authorised recreational use is restricted to walking activities on the two footpaths which cross the site. In reality the principle land use is agriculture, including arable uses as demonstrated by the Parish Council's own evidence base. Therefore it is not available for recreational purposes.</p> <p>We note that the Parish Council have again submitted their landscape evidence rejected as insufficient evidence by the Neighbourhood Plan Examiner. However, in landscape terms there are considerable differences between the landscape impact of Field 1 which has views to and from Nailsea and Fields 4 and 6 which are relatively flat and well contained by existing residential development. It is these characteristics that we have used to propose options for development for part of the site and consideration of more extensive recreational uses or retention of the remaining land in agricultural use as appropriate.</p> <p>We have previously commented that the proposals for Local Green Space designations contained within the Consultation Draft of the Backwell Neighbourhood Plan were proportionate with the purposes with providing Local Green Spaces which equate to the proposal set out in the Site Allocations Plan by North Somerset Council. However, for the following reasons we do not consider that even this smaller area should be designated as Local Green Space.</p> <p>Firstly, whilst the total area comprises six fields, the land is effectively managed as a single parcel for agricultural purposes by a tenant farmer and forms a single planning</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>unit. Therefore in view of the Neighbourhood Plan Examiners view that the whole area fails to meet NPPF guidance by virtue of being extensive it is then disingenuous to attempt to overcome this by dividing the area into individual field parcels.</p> <p>Secondly, the current position is that there is an unresolved planning application on the site. That application retains a larger area than the currently proposed Local Green Space in open uses. Our view is that open land can be better protected in perpetuity by planning conditions or through a Section 106 Agreement than by designating the land as Local Green Space. If planning permission is granted for development on other parts of the site, the open land will be gifted to the local community, or North Somerset Council, or be managed by a Management Company (whichever route is preferred) for whatever purposes or uses the community/Council's would wish without the need to be designated as Local Green Space. However, if the land is allocated as Local Green Space it will be retained in private ownership and actively managed for agricultural purposes, in which case there would be no additional public access other than the public footpaths, no additional ecological, landscape or recreational improvements and no community involvement in its management.</p> <p>Therefore we consider it is unnecessary to allocate any of the land at Farleigh Fields as Local Green Space and in the event of planning permission being granted it will be more beneficial for community purposes if it were not.</p> <p>For all the above reasons we consider the proposed Local Green Space designation at Farleigh Fields should be deleted.</p>
backwellresidents	Backwell Residents Association	928033//1	<p>Backwell Lake:</p> <p>This is a nature conservation area. The lake is surrounded by a very well used footpath. The lake area has matured over the years with substantial clumps of trees and vegetation and is a delightful and tranquil spot. It is also now the centre of significant numbers of wild birds and other wildlife and boasts a number of rare plants and wild flowers. <i>BRA is very supportive of this area becoming designated as LGS.</i></p>

Name	Organisation	Comment ID	Comment Received
backwellresidents	Backwell Residents Association	928033//2	<p>Farleigh Fields:</p> <p>Two specific fields are proposed within the group of enclosed fields known as Farleigh Fields. These two fields form a “T” shape, and both have footpaths running across them. The two fields form part of an active and viable agricultural holding, but the footpaths are nevertheless very actively used by walkers, both ramblers on circular walks and local residents from the A370 road and the centre of the village accessing St Andrews church, and properties in Church Town. The fields form part of a group offering lovely views, tranquillity, and wild life.</p> <p><i>BRA is very supportive of these fields becoming designated as LGS</i></p> <p>Furthermore, we wish to point out the damage which would be created to this LGS if the current plans by Messrs Charles Church to develop in this area were permitted. (Planning Application Ref.: 15/P/0315/0) These plans include a major access road to the proposed residential areas crossing the LGS, together with a pond, children’s play area etc. This development would ruin the whole purpose of creating an LGS.</p>
backwellresidents	Backwell Residents Association	928033//3	<p>BRA also proposes a further area which we believe should be given LGS status. i.e. A field on the west side of the village adjacent to residential development in Rodney Road - see attached plan – area coloured yellow. This field formed part of a much larger proposal submitted in Backwell’s draft Neighbourhood Plan (which was not accepted by the Inspector). It was also included (as part of a much smaller site) in our original comments on the draft Sites and Policies Plan (letter dated 18 April 2016 – copy enclosed). We have never been given any reason by NSC for not considering it. This field is crossed by a very well used footpath, which provides a designated “green route” from the west end of the village to Westleigh Infant School, and is also well used by local residents. It provides a “green” extension to the</p>

Name	Organisation	Comment ID	Comment Recieved
			Recreation Fields, and provides a restful and tranquil route across the village. The lie of the land gives the field an obvious boundary. <i>BRA considers this field merits being added to the LGS total for Backwell</i>

Section

Congresbury

Name	Organisation	Comment ID	Comment Received
Congresbury Parish Council	Congresbury Parish Council	7688737//1	<p>Congresbury Parish Council Planning Committee wish to add the following comments with regard to the Local Green Spaces schedule of the Site Allocations Plan 2006-2016;</p> <ul style="list-style-type: none"> • There is a need to amend the King George V play area section in respect of the referendum for the new Community Hall and the Community Right to Build Order which will cover a section of the green space. • Addition of sites to include land to the east of public footpath from Cobthorn Way down to the river, recent Sunley Homes Development site where there is a considerable area which will be of community value. • Add Kent Road Green, Broadstones, area west of public footpath from Well Park and Millennium Green also as important and valued green spaces.
Tom Leimdorfer		936033//2	<ul style="list-style-type: none"> • The designation of the King George VI playing field as Local Green Space needs to take account of the Community Right to Build Order for the New Village Hall, passed by the Council following the village referendum; • The Riverside Gardens (Between the A370 and the Millennium Green) should have LGS designation separate from the Millennium Green as it is not part of it; • The land off Cobthorn Way, east of the public footpath adjoining the new development of 38 dwellings, should have LGS designation. Negotiations are at an advanced stage for that area to be managed by YACWAG (Yatton & Congresbury Wildlife Action Group) as a wildlife reserve following the construction phase. Designation of this land as LGS is the logical consequence of the site allocation for 38 dwellings west of the public footpath; • The small but important open space between the A370 and the north section of Kent Road should be designated as LGS.

Section

Nailsea

Name	Organisation	Comment ID	Comment Received
Nailsea Action Group	Nailsea Action Group	14823809//9	<p>From the responses to comments raised at the first consultation stage, we note that designation of the Uplands as local green space was refused on the basis that it would be inconsistent with the local green space background paper and Planning Practice Guidance (PPG) - open space, paragraph 007. The background paper is just a repetition of paragraph 007 of PPG - open space. However, this paragraph states designation of local green space should be consistent with local planning for sustainable development and should not undermine plan making. This is not the same as saying that sites proposed for development in the Sites Allocations Plan are not more appropriate for designation as local green space. In fact, since the Uplands is not a sustainable site (see comments for the Uplands), designation as local green space is in fact more consistent with local and national policy than designation as a site for development.</p> <p>We would also propose that the site West of Engine Lane should also be included as local green space (if the settlement boundary is moved outside the site). The response from North Somerset Council may have be the same as for the Uplands, but as for the Uplands, the site West of Engine Lane does not meet the requirements for sustainable development (see comments for West of Engine Lane) and therefore designation of this site for local green space, would be more consistent with local and national policy. Specifically, designated open space is appropriate for green space that is “in reasonably close proximity to the community it serves, is demonstrably special to a local community and holds a particular local significance for example because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife, and is local in character”. The West of Engine Lane site meets these criteria based on:</p> <ul style="list-style-type: none"> • being on the settlement boundary and urban edge of Nailsea and therefore close the community is serves, • is demonstrably special to the local community (as evidenced by the use of the open space on the site and objections to its development), • it is beautiful and typical of the character of the area (including historic significance) as well as tranquil. This is supported by the North Somerset Landscape Character Assessment, which describes the area in which the sites is located as a “coherent and distinctive survival of medieval landscape” and a “remote intimate scale landscape with peaceful ambiance”.

Name	Organisation	Comment ID	Comment Recieved
			<p>If designation as open space were not possible for the whole site, then it would still be appropriate for the 4 acres leases by the Nailsea Rugby Club, which is currently used by the public as open space.</p> <p>If designation as open space were not possible for any of the site, then the West of Engine Lane site is still not appropriate for development according to policy SA8, which states that: “Within settlements planning permission will not be granted for development that unacceptably affects the value of undesignated green space making a worthwhile contribution to amenity and/or the townscape, character, setting and visual attractiveness of the settlement.” This site provides valuable amenity value in the form of valued open space, is typical of the character of the area and, being part of the Nailsea Farmed Coal Measures landscape, has been identified by the Landscape Character Assessment as being a “remote intimate scale landscape with peaceful ambiance” and a “coherent and distinctive survival of medieval landscape”. The site therefore would be more suitable as undesignated open space than a site for development based on the contribution to the visual amenity, landscape, character and setting.</p> <p>Contraventions of NPPF:</p> <ul style="list-style-type: none"> • North Somerset Council undertook a review of open space requirements and found Nailsea to have sufficient designated open space. However, the review did not consider the distribution of open space throughout Nailsea. Consequently, only one area of open space is designated for the west of Nailsea (Hannah More Park). Currently, 4 acres of land on the West of Engine Lane (the part leased by the rugby club) and the Uplands are used as open space, but not designated. If land West of Engine Lane and the Uplands are developed, residents in the west of Nailsea will be significantly further from accessible open space. Even if open space is included on the developments, the extent will be far less. Therefore reasonable access to open space, as required by the NPPF will be significantly restricted and for many residents reasonable access will no longer be possible. • Planning should protect and enhance rights of way (Planning Practice Guidance paragraph 75). However, development on the land West if Engine Lane and the Uplands will be to the significant detriment of public rights of way (PROW's). What are currently rights if way across open spaces, which are peaceful and scenic will become restricted muddy paths, with former views obstructed by modern housing. One of the West of Engine Lane PROWs

Name	Organisation	Comment ID	Comment Recieved
			<p>is also a bridlepath so would be even more negatively affected by being restricted - the path will become far more muddy and slippery and forward visibility will be reduced, making the route less safe than it currently is.</p>
HEllis		14827873//2	<p>I agree with the areas proposed. I would also propose that the land West of Engine Lane is also local green space as it performs the functions required, particularly the 4 acres leased by the rugby club (used for recreation, typical of the local character of the area and adds to the rural character, with hedgerows and dry stone walls, also is a very peaceful, tranquil setting). I understand that land used for farming is unlikely to meet the criteria for designated open space. While I would consider the whole of this site suitable as designated open space, if farmland cannot be included then the 4 acres leased by the rugby club should be designated at open space.</p> <p>The site has been proposed for development, however, given that it does not meet the criteria for sustainable development (see my comments for the West of Engine Lane site), it is not appropriate with respect to the NPPF as a site for development. Therefore it should be removed from the list of sites for development and allocated to open space.</p> <p>I would also like around comment that there is a lack of designated green space in the west of Nailsea, which goes against the NPPF requirements for access to open space. This is further reason to designate all or part of the West of Engine Lane site as open space.</p>
Mr S Jukes	-	14869217//1	<p>I am the current owner of the land at Nowhere Lane, off Trendlewood Way, Nailsea (also highlighted yellow in Fig 1 of the attachment). I acquired it in September 2013.</p> <p>Please accept this letter in addition to the preliminary comments made on the 13th May 2016 and followed up on 17th June 2016. These comments have been made since and in response to the first notification to me by North Somerset Council on 3rd May 2016.</p> <p>My comments oppose the designation of this land as open green space.</p> <p>The justification given for Local Green Space Designation</p> <p>“Includes former coal tip (“tump”) of historic interest, well treed. Site is important for setting of and views towards this feature. On HER as archaeological site: site of East End Pit, Trendlewood Way,</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>post medieval coal mine. Shown on late 19th century Epoch map. Note: Suggested by Nailsea Town Council and others”.</p> <p>The National Planning Policy Framework states that: 'Local Green Spaces may be designated where those spaces are demonstrably special to the local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife'</p> <p>Land owners opinion</p> <p>Since being informed by North Somerset Council in May 2016 that this land is being considered for Local Green Space designation, I have spent considerable time and effort researching the local significance in order to reach a balanced view.</p> <p>There is no significant evidence to support or demonstrate that the area of land in question is demonstrably special to meet the terms of the NPPF as outlined above. Below I have outlined why the proposed designation cannot be supported:</p> <p>Landscape/Beauty</p> <p>An independent landscape and visual impact survey has been prepared under the guidelines of the Landscape Institute and submitted (also attached to this correspondence). From a landscape perspective the land is insignificant and cannot be safeguarded as Local Green Space on the grounds that the site holds significance for reasons relating to beauty (i.e. local landscape significance) in accordance with the National Planning Policy Framework.</p> <p>Recreational Value</p> <p>Public right of way over the established linear corridor of Nowhere Lane is protected under existing legislation; therefore additional legislation for its protection is unnecessary.</p> <p>There are no rights of access across this private site which deviate from the bridleway. The site is marked as private.</p> <p>Part of the site (approximately ¼ of an acre) is elevated at 3.5m and directly overlooks the rear gardens of Shetland Way and St Andrews Close, any public use of the land, if granted in future, would be detrimental to the privacy and well-being of the occupants of these homes.</p> <p>Public Interest</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>I have written to all surrounding neighbours, visited Nailsea Town Council, contacted local press and written to North Somerset Council. No public interest has been demonstrated other than for a brief and inconsistent period where relations with a potential developer and the immediate neighbours became acrimonious.</p> <p>There is no evidence of consistent public interest in the land.</p> <p>Wildlife Value</p> <p>The site is small, at ½ an acre and surrounded by immediately adjacent domestic gardens on three sides and a public road on the other. The wildlife survey carried out by the previous owner in 2010 did not find significant evidence of protected species. For example, no bats were found, but there were potential roosting sites in the trees, as one would expect in a copse of mature trees covered with ivy. Note that there has been a bat box on one of the trees for several years and it remains unoccupied. There is evidence of an abandoned outlying badger set.</p> <p>However, wildlife is sufficiently and rightly protected by stringent legislation and additional legislation would be cumbersome and unnecessary.</p> <p>There is no evidence to demonstrate that the site is significant from a wildlife perspective.</p> <p>Historical Significance</p> <p>This site does not meet Local Green Space requirements on historic grounds.</p> <p>I have read the sparse collection of local coal field historical publications held at the local and regional library and the little material available on the internet . The land is merely mentioned, along with all known former coal mining sites, but it is not in any way referred to as unique or of special historic interest. It is mentioned mostly in list form and is only referred to as a former mine (East End Pit) with a single shaft and a large spoil heap.</p> <p>The capped shaft lies outside the site boundary, leaving only the spoil heap on the site, which is not readily visible to the public (see landscape survey).</p> <p>At the other end of the local heritage spectrum, the close by Middle Engine Pit in the Elms Colliery retains significant buildings and historic features, sufficient enough to warrant its designation as an ancient monument. It is noteworthy that Middle Engine Pit itself has</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>suffered neglect, vandalism and ended up on the 'at risk' register. See recent BBC news article http://www.bbc.com/news/uk-england-somerset-30998031</p> <p>Funds have been found to restore Middle Engine Pit, but this demonstrates just how inappropriate and counter-productive Local Green Space designation of a site such as Nowhere Lane would be. It is of low historic value and would remain neglected as it has always been.</p> <p>Archaeology</p> <p>Should planning permission be sought on this site at any stage, an assessment of the archaeological significance of the site and the impact of any proposals on such significance, if found, would be submitted with any application.</p> <p>This is a common condition and does not in any way warrant further legislation.</p> <p>Maintenance and upkeep</p> <p>Due to the significant numbers of TPO protected trees on the site, and the public bridleway running through one side of the land, there are significant costs associated with even the most basic of maintenance, such as: public liability insurance; arboricultural surveys and the associated tree works. North Somerset Council are aware of this, and during previous correspondence with me in September and October 2013 an officer stated that the cost of maintenance was an issue, even for those with public funds.</p> <p>I quote. "...we are very reluctant to increase our maintenance commitments".</p> <p>With a few exceptions, the neighbouring garden fences have been neglected and many have been left to totally collapse – a further sign that the land is not of public interest, not even for many immediate neighbours.</p> <p>Local Green Space designation for such a small and insignificant site makes this particular land valueless and unusable for the owner, and without demonstrable public interest or public funding consigns it to be abandoned and unkempt as it always has been.</p> <p>Summary</p> <p>In summary, the land at Nowhere Lane does not justify designation as Local Green Space.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>The public interest was overplayed during a brief and inconsistent period to prevent inappropriate development, which is more appropriately controlled by planning legislation.</p> <p>The wildlife and the trees are effectively protected by existing legislation.</p> <p>Public right of way over Nowhere Lane bridleway is established and not under threat.</p> <p>There is extensive green space nearby already (see Fig 1).</p> <p>There are historic sites in the vicinity which are worthy of protection on heritage grounds - this is not one of them.</p> <p>The allocation does not meet the Local Green Space requirements as set out in paragraph 77 of the NPPF and will be resisted for these reasons.</p>

Section

Weston-super-Mare

Name	Organisation	Comment ID	Comment Recieved
Shrubbery Neighbourhood Group	Shrubbery Neighbourhood Group	15924033//1	<p>In the Shrubbery area up on the hillside of Weston-super-Mare, we have three green spaces which Shrubbery Neighbourhood Group and North Somerset Council (and Weston Town Council as regards emptying of dog bins) look after together.</p> <p>I was concerned to notice that only the largest of the three parks was designated as a green space on the map. This is what we call the main Shrubbery park. It's the largest and contains a play area and kick wall for football. However, adjoining to the west we have West Park. This is maintained by the Group as a nature reserve/wildlife area. To the east, we have East Park which is bordered by Tower Walk and maintained as a more formal area with shrubs and trees looked after by the Council. We monitor all three parks, and keep them free of litter.</p> <p>We would seek to protect all three of these green spaces, which is what makes the Shrubbery area unique. I imagine they have been here at least since 1881 which is when the house I live in was built.</p>
D. E		15972289//10	<p>It would be appreciated if the council could allocate some bigger / wider areas of linear open space between new and existing developments. More protected and inaccessible areas for wildlife habitat (not adjacent main roads where the wildlife mainly gets run over) The linear open space provided around Summer land is good but could have done with being wider and with more concern for wildlife habitat.</p> <p>The council working with Avon wildlife trust (who are running an urban wildlife project in Bristol) is suggested with a view to similar provision for Weston .</p>

Section

Wrington

Name	Organisation	Comment ID	Comment Received
Wrington Parish Council	Wrington Parish Council	1019201//10	<p>We were disappointed to find that two sites previously recommended for designation as Local Green Space were not included in the consultation document. Repeating our previous submission, these are:</p> <p>a. The Mike Bush Paddock, Wrington Hill</p> <p>A grass space surrounded by hedging, trees and fields, providing extensive views over Wrington Vale to the south and south-west. This is well used as a picnic area, for general recreational purposes and as a stop-off for people walking both up and down Wrington Hill and further afield. Site area 0.22Ha.</p> <p>b. Land to the west of Garstons Orchard, Wrington</p> <p>This is a grassed area immediately to the west of the open stream where it flows out from the village. The land concerned is all that within the Conservation Area but outside the settlement boundary and is included here because of its fit with the character of the village and its visual public amenity value. This land also has significant ecological value related to the stream, the trees and hedging both along its banks and elsewhere on the field boundary. Surveys have demonstrated that the field and trees are used extensively by foraging bats. 1.74Ha.</p> <p>Our view is that these sites should be designated as Local Green Space and we ask that they are reconsidered.</p> <p>Glebe Field extension:</p> <p>In addition, we request that the Local Green Space designation for the Glebe Field, which is located between Church Walk and the Glebe, Wrington, is extended to include the green public amenity area which has recently been created on the site of the old surgery car park under planning application 16/P/1423/F, ref 'Change of use of land to public open space'. This amenity area is considered to be an extension of the Glebe Field and mirrors it in character and layout, with this stated in the land management plan submitted with the planning application and agreed by NSC.</p>

Section

Yatton

Name	Organisation	Comment ID	Comment Received
No Moor Development (Yatton)	No Moor Development	16100417//3	<p>Local Green Space</p> <p>We strongly support the principles of Policy SA7 and congratulate NSC on recognising the need to protect these areas which are highly valued by their local communities.</p> <p>Part of the Moor Road site in Yatton has been allocated in NSC's draft local plan for housing, but the parish council and emerging neighbourhood development plan (NDP) have also sought to protect the former training pitches as local green space. We would support this - particularly given that the land was leased to Yatton RFC for 8 years as training pitches for their junior section.</p>
UTAS Claverham UK		16119617//1	<p>On behalf of my client, Claverham Ltd., a UTC Aerospace Systems company ("UTAS Claverham UK"), I write to submit Representations in relation to the current consultation on the emerging North Somerset Site Allocations Plan.</p> <p>UTAS Claverham UK is the freehold owner of the area adjacent to Claverham Village Hall (hereafter referred to as the "Site") currently identified in the consultation version of the Site Allocations Plan as a "<i>grass area adjacent to Claverham village hall used for May Day celebrations</i>"¹ of 0.63 ha. The justification statement in the Plan indicates that the Site comprises of a grass area with trees to rear, used for May Day celebrations and other events.</p> <p>The full justification provided in the Background Paper on Local Green Space (updated October 2016) cross references to the emerging Neighbourhood Plan which describes the land as "<i>the May Day Field</i>". The background paper further quotes the chairman of the steering group for the Claverham Neighbourhood Plan in noting that the site is used for May Day celebrations, open-air theatre, beer festivals and other events.</p> <p>UTAS Claverham submits that the Site should not be identified as a Local Green Space. As noted above my client is the freehold owner of the land in question. The land is not functionally available for local use on a general basis. My client has advised that whilst it has been occasionally made</p>

Name	Organisation	Comment ID	Comment Received
			<p>available for use in relation to the local May Day celebrations but that it is on an infrequent basis and the land has not been used to the extent indicated by the local community. As a result, UTAS Claverham UK disputes the proposed identification of the land as a Local Green Space</p> <p>In addition, having reviewed the background paper, and in particular the definition of Local Green Space, UTAS Claverham UK does not believe that the proposed designation meets with the specific criteria contained therein. In particular, the subject site does not appear to meet the "recreation" criteria.</p> <p>Paragraph 2.7 of the Local Green Space background paper states that in relation to recreational value "<i>Green space may be considered to warrant LGS designation on grounds of recreational value, particularly where it supports a variety of activities and is therefore of greater value to the community.</i>"</p> <p>Based on this description, the Site cannot reasonably be classified as recreation space given the fact that it is almost exclusively limited to private use and only occasionally used by members of the community on a subject to agreement basis by my client. To put this in another way if my client were to decline the use of the land for recreation purposes the community would have no right whatsoever to utilise the land.</p> <p>I also have regard to paragraph 3.2 of the background paper which deals with private land and public access. It is recognised that Local Green Space does not need to be in public ownership and that land "<i>could be considered for designation even if there is no public access (e.g. green areas which are valued because of their wildlife, historic significance and or beauty)</i>" (PPG paragraphs 0.19 and 0.17 on LGS). However, in this case the land has been identified because of its recreation capability and as outlined above there is no certainty that that such recreational uses may continue in the future.</p> <p>I also note that the land has been identified as Local Green Space based on its claimed beauty which is described in the background paper as "<i>the visual attractiveness of the site, and its contribution to townscape, landscape, and /or character of the settlement, which would normally be expected to be significant.</i>" Whilst the Site provides an attractive backdrop to the village, it does not necessarily follow that this value contributes significantly to the village and wider area as</p>

Name	Organisation	Comment ID	Comment Received
			<p>envisioned by paragraph 2.4 of the background paper. We note that the general Development Plan protection relating to maintaining valued character of land across the District is more than sufficient to manage/respond to any future proposals that may affect the land. Due to the above evaluation confirming that the Site should not be afforded recreational value, as per the definition outlined in the background paper, it would be extremely tenuous to allocate the green space on beauty value alone.</p> <p>Finally, UTAS Claverham UK does not believe there is sufficient evidence on which to conclude that the Site is "<i>demonstrably special to the local community</i>" as set forth in Paragraph 77 of the NPPF (which is referenced in the Background Paper). Indeed, there are no facts offered to explain how or why the Site is demonstrably special to the local community. On the contrary, the sole justification seems to be a quote from the chairman of the steering group for the Neighbourhood Plan that has not yet been substantially progressed.</p> <p>Based on the above, UTAS Claverham UK respectfully submits that that identification of the Site as a Local Green Space is inappropriate because the Site does not meet the tests or criteria for LGS as set out in the background paper, or indeed paragraph 77 of the NPPF. As a result, North Somerset Council should omit the Site from this designation.</p> <p>Separate and apart from the issue of how the Site should be designated, you will be aware that my clients have announced their intention to vacate the whole of their landholdings at Claverham. Whilst UTAS Claverham UK feels strongly that the proposed identification of the Site as a Local Green Space is inappropriate, we would very much welcome the opportunity to discuss the future of the whole landholdings with North Somerset Council. UTAS Claverham UK recognizes that a new use will need to be found and that such future use may warrant inclusion of an area of Local Green Space to be delivered as part of comprehensive approach to the future planning of the wider land.</p> <p>On behalf of UTAS Claverham UK, we thank you for your consideration of the objections we have raised to the Local Green Space designation for the Site. While we object to this designation for the several reasons above, we share the interest of North Somerset Council and the local community in finding an active and sustainable use for the Site as part of the</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>planning considerations for the wider landholdings and would welcome the opportunity for further dialogue on this matter in due course.</p>
Judith Cockram		16127713//2	<p>North Somerset Council have solved their problem of housing numbers by allowing too many houses to be built at North End Yatton.</p> <p>NSC has ignored the lack of facilities in this area. In fact by including the rugby training pitches in the Site Allocation Plan, NSC is depriving the old and new residents of recreational opportunities within walking distance.</p> <p>This inclusion in the SAP has already had a direct and adverse effect on the Yatton Rugby Club. The consequence of this is that the potential developer has withdrawn their prior commitment to providing alternative training pitches. This has meant the YRC has had to put their own fields on the market. If they have to move away from the village this makes all the new developments even more unsustainable.</p> <p>A short sighted and incompetent move from North Somerset showing no forward thinking or joined up planning. Only by making the training pitches a LGS for the benefit of the local community can this potential disaster be resolved</p>
Yatton Parish Council	Yatton Parish Council	3106433//4	<p>Local Green Spaces</p> <p>The Site Allocations Plan has been produced to give clear guidance on what we want to achieve for our villages and the greater area of North Somerset. It is important that the ideas are consistent across the whole area.</p> <p>This means that the following needs to be addressed</p> <ul style="list-style-type: none"> • Local Green spaces are not consistently selected across North Somerset • Congresbury Millennium Park and Claverham Broadcroft are both Local Green Spaces • In addition to the areas already allocated in Yatton the following should also be allocated to Local Green Space status <ul style="list-style-type: none"> ◦ Rock Road playing field ◦ Hangstones playing field ◦ Horsecastle Park

Name	Organisation	Comment ID	Comment Recieved
			<ul style="list-style-type: none">◦ Yatton Rugby Club◦ Cricket Club grounds◦ Strawberry line & entrance area off Yatton Station◦ Yatton bowling green◦ Gang Wall◦ Site off Claverham Close adjacent to Hangstones Pavilion.

Section

Schedule 5: Proposed sites for community use.

Name	Organisation	Comment ID	Comment Received
Wrington Parish Council	Wrington Parish Council	1019201//11	<p>We note that designation of land to the south (and east) of Rickyard Rd is carried over from the RLP as strategic open space. We support this continued designation.</p> <p>We also note the proposed designation of two new allotment sites, one in Weston, the other in Yatton. It is our understanding that while the Wrington allotment site on the east side of Half Yard, between Wrington and Langford, appears on some maps it has never been formally designated. We suggest that to ensure that this site is protected into the long term future it should now be recorded by NSC in the Site Allocations Plan. Similarly, it seems that the Recreation Field in Silver Street, Wrington, is not specifically designated. In which case, this should also be recorded as a community site in the Site Allocations Plan.</p> <p>Therefore, we repeat our previous recommendation that the following sites are designated:</p> <p>a. Allotment site, Half Yard, Wrington.</p> <p>This is located on the east side of Half Yard, the road linking Wrington with Langford, and provides allotment facilities for parish and other local residents. 1.01Ha.</p> <p>b. The Recreation Field, Silver Street, Wrington</p> <p>This large site includes a football pitch, cricket pitch, croquet facility, tennis courts skate park and children’s play area. It is considered to be an essential facility. 2.23Ha.</p> <p>c. Land at the rear of Redhill Village Hall, Church Road, Redhill</p> <p>This is a grassed area used for recreation, sports and general community use linked with the Hall and Redhill Club. It includes a fenced play area for children. 0.53Ha.</p>
Louis Dulling	PCL Planning	14829185//1	<p>We write in relation to the above consultation on the North Somerset Site Allocations Plan on behalf of our client Mr Sanders (see attached). We wrote on behalf of Mr Sanders previously in our letter dated 28th April 2016. These comments build upon our</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>previous comments and are made in light of comments made in respect of the previous draft SAP and subsequent significant alteration to the Draft Site Allocations Plan. These alterations directly relate to our client's land interest (see attached site plan).</p> <p>We wish to comment as follows:</p> <p><i>Comment on Draft SAP</i></p> <p>The below extract is taken from page 101 of the document titled '<i>Summary of comments made on the March 2016 Consultation Draft of the Site Allocations Plan and the Council's Response (Consultation Statement)</i>' (herein referred to as the <i>Consultation Statement</i>):</p> <p>CHAPTER - COMMUNITY USE ALLOCATIONS BLEADON</p> <p>Summary of responses:A new school would be required if development in the vicinity which are subject to planning appeals were to be allowed.</p> <p>Council's response:The Site Allocation Plan does not allocate any significant development in the Bleadon area. If this changes or developments are granted on appeal then this will need to be reviewed. The only suitable site would be the site allocated for Strategic Open Space (West of Bridge Rd) and a note to this effect will be added to Schedule 5.</p> <p>The applications to which the above comments refer are:</p> <ul style="list-style-type: none"> • Appeal ref 3142927 (15/P/01670/O) – Land at Bleadon Hill; Outline planning permission for the creation of up to no. 79 open market and affordable dwellings, public open space and associated infrastructure. All matters reserved for subsequent approval except for means of access. • Appeal ref 3151660 (15/P/0983/O) – Land at Wentwood Drive; Outline application with all matters reserved except access for up to 50 no. dwellings with associated parking, hard/soft landscaping and open space, drainage and infrastructure. <p>We would concur with the extract from the <i>Consultation Statement</i> that should the above mentioned appeals be allowed there would be increased pressures on schools and therefore a new school may be justified given the potential increase of up to 129 dwellings within the immediate area. This does not include the current</p>

Name	Organisation	Comment ID	Comment Received
			<p>proposed allocation, known as Bleadon Quarry, which seeks to provide 42 dwellings.</p> <p><i>Site sustainability</i></p> <p>The document titled <i>Reviewing the sustainability and settlement hierarchy of settlements in North Somerset – Executive Summary Report</i>, dated October 2016 assesses the sustainability of Bleadon. The delivery of a school on the site allocated for Strategic Open Space would improve the overall sustainability score of Bleadon by adding to its local facilities. The delivery of the allocated site, Bleadon Quarry, which provides a mixed use development and thus will improve the sustainability score in relation to the number of job opportunities in Bleadon. The overall sustainability score of Bleadon, which lies 5km from Weston-Super-Mare, would clearly be improved.</p> <p>This improved sustainability score would justify the enabling development necessary for the release of land to deliver the school.</p> <p>The site is therefore well located in respect of the existing local centre and we would concur with the Council’s statement:</p> <p><i>"the only suitable site would be the site allocated for Strategic Open Space (West of Bridge Rd)"</i> (page 101, Consultation Statement).</p> <p>It is therefore clear that the Council accept that this site is appropriate for some form of development. Thus, the development of the site may be acceptable in landscape terms and would not undermine its function as Strategic Open Space.</p> <p>The delivery of a new school is a significant strategic infrastructure item of great community benefit.</p> <p>Enabling development/recommendation</p> <p>Our client would not be adverse, in principle, to facilitating the release of the land to deliver a new school. Mr Sanders also owns the adjoining field which could be considered as part of any allocation. Thus, in order to make it viable to facilitate the release of land for a school the inclusion of adjoining land to support enabling development would be necessary. We would contend that this would enable a mixed-use scheme to be delivered on the site (education and residential). Therefore, we respectfully request that the site is considered for residential development as well as a site for a school.</p>

Section

Primary Schools

Name	Organisation	Comment ID	Comment Recieved
North Somerset Internal Drainage Board (Simon Bunn)		16130337//35	<p>Land next to the Village Hall, Kewstoke Primary school replacement site</p> <p>Arnolds Way Phase 1 Primary School</p> <p>Land at The Batch, Yatton Primary school replacement site</p> <p>Significant drainage issues in downstream catchment, development should contribute to reducing existing flood risk.</p>
Yatton Parish Council	Yatton Parish Council	3106433//7	<p>Land Designated for Schools</p> <ul style="list-style-type: none"> • We would like the area of land off The Batch in Yatton, currently designated as a site for a school, to be designated for a site of community benefit rather than a school. • There are two site allocations for schools in Yatton, as well as the existing site within Yatton which already has a large primary school. We believe that the site at the Batch is not necessary. We can clearly understand the requirement for a school located at the North End of the village in the new housing development.

Section

Strategic Open Space

Name	Organisation	Comment ID	Comment Received
Alder King (M Cullen)		14896737//1	<p data-bbox="659 488 1398 589">OBJECTION TO COMMUNITY USE ALLOCATION SA10 (AND SCHEDULE 5) – LAND EAST AND NORTH OF BROOKFIELD WALK, CLEVEDON</p> <p data-bbox="659 629 1460 763">I refer to our representations made in March 2016 in relation to the above and on behalf of Clevedon Court Estate OBJECT to the draft Strategic Open Space allocation on Land to the east and north of Brookfield Walk, Clevedon.</p> <p data-bbox="659 801 1445 1357">The site has been carried over from the Replacement Local Plan (previous site reference POP2 safeguarded under RLP Policy CF/4), (and we understand before that from the North Somerset Local Plan) so has been an allocation from as far back as 2002 and probably earlier. Both these plans are now superseded by the adopted Core Strategy and the now adopted Policy DM68 of the Sites and Policies Plan Part 1. This policy seeks to protect land 'proposed' for sporting use but today this policy does not apply to the land as formally it is not yet 'proposed'. Discussions with the council's leisure services team confirms that the council are to re-examine the district's playing pitch provision and this is due to commence in January 2017 but until this exercise has been undertaken it is, 'prudent at this stage to retain the allocation'. This is despite the council's informal opinion, however, that land east and north of Brookfield Walk is not the preferred location for playing pitch provision.</p> <p data-bbox="659 1395 1455 1637">Whilst we anticipate a 'robust and up-to-date' assessment of the need for open space, sport and recreational facilities in Clevedon, and any forthcoming allocation must be objective, realistic and based on up-to-date and relevant evidence. This evidence should also include local consultation with, amongst others, 'private sector organisations'. Plans must be 'deliverable' (Framework paragraph 173).</p> <p data-bbox="659 1675 1455 1946">There has been no liaison with the landowner, other parties with an interest in the land, or any attempt to actively implement the change of use/development envisaged. Essentially previous stagnant policy has not been delivered for a period in excess of 15 years. This is now compounded by simply bringing this allocation forward without any evidence to support it, any detail of actually what may be proposed, and no liaison whatsoever with the landowner.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>To refer back to our letter of March 2016, this is a wholly speculative allocation that has no evidential justification and no realistic chance of being delivered other than via assertive Compulsory Purchase or in association with other commercially viable and deliverable development.</p> <p>On the basis of the above my client retains their OBJECTION to this Strategic Open Space allocation put forward by the council and request that it is deleted from the Proposals Map and from Schedule 5.</p>
Nailsea Holdings LVA LLP	Nailsea Holdings LVA LLP	16098881//1	See Summary
Bristol Sport Ltd		16123617//1	<p>Our client, Bristol Sport Ltd, has asked us to respond on their behalf to the Regulation 19 consultation regarding the Sites & Policies Plan Part 2. These representations relate to Bristol City Football Club's training facilities at Clevedon Road in Failand (hereby known as Failand Training Ground). A site plan is appended to these representations.</p> <p>Context & Background</p> <p>Bristol Sport Ltd, which oversees the business, commercial and operational interests of its affiliated clubs including Bristol City Football Club (BCFC) and Bristol Rugby Club (BRC), has secured several planning permissions in recent years, to provide temporary gym and changing facilities as well as new sports pitches for use by BCFC for training purposes at the Failand Training Ground.</p> <p>Prior to the construction of gym and changing temporary facilities at the site, BCFC shared the use of the QEH Pavilion with QEH. Unfortunately, several operational issues arose associated with the shared facilities (such as capacity and programming) which meant that it was necessary for temporary buildings to be erected for the sole use of BCFC. However, this arrangement has always been seen as an interim solution prior to progressing proposals for a modern permanent BCFC training facility at this location.</p> <p>BCFC currently still uses and maintains wider sports pitches at the QEH site with the adjoining land under the control of the club used for the temporary training accommodation.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>In April 2015, the Council granted planning permission1 to enable the temporary buildings to remain in situ for a further 3 years (until 31 May 2018) whilst plans for the new permanent facility progress. It was recognised within the officer report that the <i>"shared facilities currently provided by QEH within their existing building, which is located on the adjoining parcel of land, is considered to be inadequate to meet the required level of gym/training facilities necessary to support the [BCFC] players in their fitness preparation"</i>. The planning permission for the changing facilities (15/P/0530/MMA) also included the excavation and levelling of the site to create 2no. plateaux for 6no. training pitches which are yet to be implemented.</p> <p>In terms of the future plans, the officer's report also stated that: <i>"Like the recently granted changing room facilities the proposed gym building is required for a temporary period whilst longer term plans for the site and the neighbouring QEH Pavilion facilities are reviewed between the two parties. The proposal therefore seeks to build upon BCFC's presence on the site and will provide the final stepping stone before coming forward with developing proposals for a permanent combined facility at this location"</i>.</p> <p>Whilst the plans for the permanent facility have not reached the planning application stage as yet, background work is progressing on the permanent facility and thus, it is considered that the need for a modern training facility for BCFC (that has also been recognised by Council) should be supported through the Site Allocations Plan in making a positive allocation.</p> <p>A modern training facility for BCFC will provide many economic and social benefits including facilities potentially for the Academy and wider community use. Securing this is critical to the future success of the football club as it cannot continue to operate with piecemeal temporary training facilities. The absence of a state of the art facility means that the club is falling behind its competitors within the Championship league and this must be addressed within the short term. We envisage further dialogue on emerging proposals with Members and Officers during early 2017.</p> <p>Community Use Allocations</p> <p>Our client is fully supportive of the introductory paragraphs of the 'Community Use Allocations' section of Chapter 4, which emphasises that, <i>"An important function of the Site Allocations Plan is to make adequate provision for both organised sport and more informal recreation whether provided by the local authority,</i></p>

Name	Organisation	Comment ID	Comment Recieved
			<p><i>voluntary agencies or the private sector"</i> (Para. 4.53) [our emphasis].</p> <p>Paragraph 4.55 is also welcomed which states that, <i>"It is important that the necessary land is reserved where service providers have identified a future need and suitable sites exist. The Site Allocations Plan is concerned with identifying and reserving sites. The timing of actual provision depends on the availability of resources"</i> [our emphasis].</p> <p>Policy SA 10 cross references a list of sites allocated or safeguarded for the relevant community use in Schedule 5. This list then subdivides the various sites into Primary Schools, Secondary Schools, Allotments, Cemeteries, Community hall, and Strategic Open Space (mainly sites carried over from the Replacement Local Plan).</p> <p>Formal sports provision is, however, absent as a category and our client considers this to be a major omission which conflicts with the intention of this section of the Plan which clearly emphasises the importance of organised sport and recreation but yet makes no positive allocations. P3/4 12994820v1</p> <p>Through the planning permissions for sports use, our client has demonstrated (and the Council has agreed), that a need exists for new permanent training facilities at Failand Training Ground. As such, in line with the supporting text to Policy SA 10, it is considered that the site should be allocated as a new permanent training facility for BCFC on the proposals map and listed within Schedule 5 to identify and safeguard the site for formal sports provision.</p> <p>It is further considered that although located outside of the settlement boundary, the facilities will be appropriate in terms of their scale and character and thus capable of meeting the principles for such development as set out within development management policies DM12 and DM69 regarding development within Green Belt and the location of sporting, cultural and community facilities.</p> <p>We note that Officers responded to our client's representations at Regulation 18 stage as follows,</p> <p>"The site is in the Green Belt. The provision of appropriate facilities for outdoor sport and outdoor recreation are considered to be appropriate development in the green belt provided that "it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it" (Para 89 of NPPF) . Policy</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>DM12 of the Sites and Policies Part 1 Development Management Policies allows such a proposal subject to certain criteria that protect the green belt. Allocating the site would in effect pre determine the impact on the Green Belt without detailed knowledge of what is being proposed. Given this, it is considered prudent to judge this proposal by way of a planning application rather than an allocation".</p> <p>We disagree that an allocation for the training ground would pre-determine issues in relation to Green Belt. There is a compelling need for modern training facilities at Failand given the inadequate temporary solution and NSC has accepted in principle the use of this site through the previous planning permissions including 6 training sports pitches. BCFC's presence at the site is therefore established over many years. Policy SA 10 could easily be adapted to require that any future schemes comply with the criterion of Policies DM12 and DM69 and if any 'inappropriate development' is proposed that 'very special circumstances' are demonstrated in accordance with national policy. The policy already cross references DM68 in relation to the alternative uses so could cross reference DM12 and DM69 in the same way. This would not prejudice the local planning authority's decision on any future planning application which would still have to satisfy relevant local and national planning policy.</p> <p>Planning Positively for Sport</p> <p>Chapter 8 of the NPPF recognises that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Para. 70 specifically states that to deliver the social, recreational and cultural facilities and services the community needs, planning policies should plan positively for the provision and use of shared space and community facilities including sports venues.</p> <p>NPPF is clear that local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to inter alia "<i>provide outdoor sport and recreation</i>" (Para. 81). This further supports the case for identifying this site for formal sports purposes.</p> <p>The NPPF is clearly supportive of outdoor sports facilities within the Green Belt albeit that the guidance provided by NPPF as to what constitutes 'appropriate facilities' for outdoor sport is relatively vague and interpretations vary.</p>

Name	Organisation	Comment ID	Comment Received
			<p>Whilst our client is requesting that this site is identified as a new training facility it is not being suggested that the site should be removed from the Green Belt. It is envisaged that any proposal will be designed to be appropriate to its context and minimise the impact on Green Belt in accordance with Policy DM12.</p> <p>Consequently, the allocation of the site for the BCFC training facility would not undermine the site's Green Belt status and this could be clarified within the site's identification within Schedule 5.</p> <p>Conclusion</p> <p>Our client supports the inclusion of community facilities within the Site Allocations document and the reference to the importance of sport and recreation within the community. It is considered however that the document does not go far enough in terms of actual allocations for formal sports facilities. In particular, BCFC's training requirements at Failand need to be recognised and positively planned for.</p> <p>There is a recognised sports need (which has been acknowledged by the Council) for a permanent training facility at this site for the benefit of both BCFC and the wider community and as such land must be identified within the plan to provide greater clarity to the football club. It is requested that the site is allocated under Policy SA 10 for formal sports provision and included on the list provided at Schedule 5.</p> <p>BSL is committed to working with NSC to deliver a modern training facility that would be designed sympathetically to its Green Belt context and would meet the club's urgent training requirements whilst delivering wider community benefits. A signal of intent from NSC within the Site Allocations Plan to support these future plans would be a positive step forward to give the football club some certainty on the location of their permanent facility.</p>
Yatton Parish Council	Yatton Parish Council	3106433//6	<p>We have reviewed the open spaces allocated around Yatton and feel that we have a very small amount in comparison to other villages like Backwell. The figures in the Site Allocations Plan suggest that Backwell have a total of 14.27 (site area ha) whereas Yatton only has 2.24 (site area ha) and two of these sites are within the infill village of Claverham.</p>

Section

Sustainability Appraisal

Name	Organisation	Comment ID	Comment Received
Gladman Developments Ltd	Gladman Developments	11199745//1	<p>In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan’s preparation, assessing the effects of the Local Plan’s proposals on sustainable development when judged against reasonable alternatives.</p> <p>The North Somerset Site Allocations Plan should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the North Somerset Site Allocations Plan’s decision making and scoring should be robust, justified and transparent.</p> <ol style="list-style-type: none"> 1. Gladman do not believe that the Sustainability Appraisal has assessed all reasonable alternatives through its preparation which is contrary to the Regulations. 2. Gladman are also concerned that, considering the Plan is a Site Allocations Plan which distributes future growth for both housing and employment across the district, the objective to ‘Promote development that contributes to a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society’ has been removed from the assessment criteria. This objective would score positively in any assessment of housing sites that are suitable and sustainably located and could deliver a mix of residential units and a policy compliant level of affordable housing. It is difficult to see how such an important objective can be deleted from the assessment. 3. Gladman also object to a number of the statements made in para 3.9 of the SA Main Report. Gladman agree that the Local Plan should ensure that the housing market in any one location is not saturated with housing allocations to the extent that the

Name	Organisation	Comment ID	Comment Received
			<p>required building rates cannot be met and a 5-year supply of housing is not achieved. However, Gladman consider that by concentrating a predominance of new housing development in Weston-super-Mare, the Local Plan falls foul of this very objective in a market that has traditionally struggled to deliver. Gladman also strongly object to the statement that priority will be given to the reuse of previously developed land over greenfield. This is contrary to the advice contained in paras 17 and 111 of the Framework that only seeks to encourage the use of brownfield land, not prioritise it. To prioritise the reuse of brownfield land is not supported by national policy and can lead to a reliance being placed on land for new development which is unviable to bring forward. This can lead to issues with maintaining a robust 5-year supply of housing land.</p>
Nailsea Action Group	Nailsea Action Group	14823809//11	<p>The sustainability assessment does not reach reasonable conclusions for sites in Nailsea based on the reasons below and is therefore not proportionate evidence contributing to the justifiability of the plan.</p> <p>Reasons for the sustainability assessment not reaching reasonable conclusions in respect of Nailsea (see attached 'SAP2 sustainability main assessment West of Engine Lane' for details in relation to the West of Engine Lane site, which has been assessed as an example of how the application of the criteria has not reached a reasonable conclusion):</p> <ul style="list-style-type: none"> • The sustainability scoping report sets out sound principles for the assessment of sustainability (i.e. the criteria were consistent with the NPPF and generally recommended distances), which we broadly support. However, the criteria used for the residential sites assessments (first sheet of spreadsheet) is different criteria, based on considerably looser measures. • The criteria were not consistently applied and inconsistent/inappropriate conclusions were drawn for sites in Nailsea. Therefore the plan is not based on proportionate evidence for these sites and

Name	Organisation	Comment ID	Comment Received
			<p>consequently not justified, as required by the tests of soundness.</p> <ul style="list-style-type: none"> • Sites (such as West of Engine Lane) have been included despite several red and amber ratings for sustainability criteria. This shows that unsustainable sites have been included and is inconsistent with the sustainability report in the first consultation, which states that mitigation would be required for red/amber ratings. However, such mitigations have not been included in the plan. • Using the comments for inclusion or rejection of sites on the residential sites assessment (result of the assessment in column AA), it is clear that inconsistent conclusions have been reached. For example, the result for the site West of the Rugby Club in Nailsea is “No. Greenfield and BMV with intrusion into the countryside. Too distant to Town Centre with poor access to bus stops.” However, the result for West of Engine Lane is “yes” despite it also being greenfield, BMV and adjacent to but not further west than the West of the Rugby Club site and therefore not further from the town centre or bus stops. Therefore the evidence base for site assessment is not reasonable or proportionate and therefore not compliant with the tests of soundness.
Oaktree Parks Ltd		14824225//2	<p>Under Section 39(2) of the Planning and Compulsory Purchase Act (2004) all new plans and specified planning documents must be subject to the process of sustainability appraisal.</p> <p>In respect of the Site Allocations Plan: Publication Draft, while the lpa has prepared a Sustainability Appraisal dealing with residential and employment allocations, as well as Local Green Space, it does not appear to have carried out a sustainability appraisal of strategic gap boundaries, nor any consideration of alternatives.</p> <p>While it is accepted that, on 8 November 2016, the Inspector dealing with the Consequential Changes to the Core Strategy concluded (paragraph 45) that there was no need to revisit Policy CS19 to accommodate the housing requirement of the Plan (to 2026), he specifically noted that the job of setting the boundaries of strategic gaps was one for the Sites and Policies DPD. He also concluded</p>

Name	Organisation	Comment ID	Comment Received
			<p>(paragraph 52) that the reference to strategic gaps in Policy CS30, concerning the strategic gap between Weston Villages and Hutton and Locking, should be deleted, but that the explanatory text may refer to the intention to define such gaps in the forthcoming Sites and Policies DPD.</p> <p>It is clear, therefore, that it is the job of the Site Allocations Plan to define the exact boundaries of the strategic gaps and that, in accordance with the legislation, the lpa should be testing how designated boundaries will contribute to sustainable development, and how these compare with alternative boundaries for the gaps.</p> <p>It is relevant that the 2013 consultation draft, while reiterating the policy intentions of CS19, did not include any criteria for defining actual boundaries of strategic gaps in its, then, draft Policy DM48. Nor did the lpa produce any evidence to support the delineation of such boundaries on the proposals map. As a consequence, representations were submitted on behalf of Oaktree Parks Ltd recommending that the strategic gap at Locking should be deleted on the grounds that it was not necessary in order to meet the policy objectives of CS19.</p> <p>As a result of uncertainty over the district's strategic housing requirements (following a successful High Court challenge of Policy CS13 of the Core Strategy) the 2013 consultation draft was put on hold and re-issued, as a further consultation draft, in March 2016. In this iteration of the Plan Policy DM48 became Policy SA9 and, while the draft policy contained no criteria for defining boundaries, the accompanying Background Document; Strategic Gaps (March 2016) included, at paragraph 6.1, broad criteria for defining strategic gaps. These were addressed in representations submitted on behalf of Oaktree Parks Ltd in which we concluded that the land, and boundaries, did not meet the criteria set out in paragraph 6.1, or those set out in paragraph 85 of the NPPF.</p> <p>In its response to comments received on the 2016 Consultation Draft, in respect of strategic gaps, the lpa decided to review its approach to the definition of strategic gaps, including the criteria to be used when defining boundaries. The revised criteria, which is included in the Strategic Gaps Background Paper (October 2016), was published on 7 November 2016 as part of a suite of documents comprising the Site Allocations Plan: Publication</p>

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			<p>Draft. To our knowledge, this document has not been subject to any prior public consultation, or sustainability appraisal, and, thus, remains the untested policy of the lpa.</p> <p>In fact, in an attempt to address criticism over its approach to defining strategic gaps, the lpa has adopted a report commissioned by the former Office of the Deputy Prime Minister, in 2001, entitled ‘Strategic Gap and Green Wedge Policies in Structure Plans: Main Report’ which, itself, referred to an earlier decision by an Inspector at the Inquiry into the Eastleigh Local Plan (1998) which considered a number of factors as being most useful in delineating strategic gaps. However, the criteria used, which pre-dates the NPPF, has not been robustly tested by the lpa as part of any sustainability appraisal and, at best, can only be regarded as out-of-date guidance on the matter.</p> <p>We submit that the lpa has not properly tested the proposed boundaries of the strategic gaps as part of the process of sustainability appraisal and that, accordingly, the policy is not legally compliant nor in accordance with the NPPF.</p>
HELLIS		14827873//3	<p>The sustainability criteria set out in the methodology paper provides a reasonable means to assess the sustainability of locations. However, the criteria used in the residential sites assessment is different. This inconsistency raises questions over the justifiability of the plan.</p> <p>Further inconsistencies are included in my response for the West of Engine Lane site (Nailsea).</p>
D. E		15972289//12	<p>I disagree with the statements made and believe this plan is promoting development which is entirely un sustainable and which clearly does not meet the sustainability objectives set out in the plan. In particular :-</p> <p>X and X1 This plan does not meet sustainability objectives better than any reasonable alternative , in fact it fails to meet any of the essential objectives set out in Table 1 :-</p> <p>eg Table 1 2.4 and 3.2 -Opportunities for people to work locally and achieve reasonable access to major areas of employment .</p>

Name	Organisation	Comment ID	Comment Received
			<p>There are few opportunities for employment in WSM , which is why such a large percentage of the working population commute to Bristol daily . Proposing a new junction of the M5 will do nothing to meet the sustainability objectives . The reverse is true - it will cost a lot of money , put people on the exact same congested motorway and provide a new junction which was previously rejected by Minister of Transport on the ground that it would be in unsafe proximity to the existing J 21.</p> <p>Development should be promoted in the northern half of the district around Long Ashton and Portishead where it would instantly meet all of the sustainability objectives . It has the employment , the infrastructure , the jobs market , the reduced likelihood of flooding relative to high floor risk WSM and an absence of affordable homes to meet the high demand for homes closer to Bristol's employment centre .</p> <p>Paragraph 1.3 . I question why the preferred sites allocations were identified through an internal assessment process , why not through public consultation ? For one thing this denies the electorate the chance to comment on the best location options for housing . To effectively eliminate pretty well all large possible sites north of Nailsea without proper consultation or setting out the real options makes a nonsense of the whole process. It deprives any meaningful consultation from happening at all and certainly precludes any genuine attempt to meet sustainability criteria.</p> <p>Paragraph 7 , I do not believe that it is beneficial to put green belt above all other objectives , and I do believe the electorate should have been consulted on whether they would like to see tracts of green belt released around Long Ashton ,Portishead and South Bristol Link road in order to a) provide development which genuinely meets sustainability objectives and b) provide affordable housing on green belt exception sites and c) provides a balanced supply of housing across the district of North Somerset. (as opposed to about 3 new homes in Long Ashton/ Portishead and about 12,000 new homes in WsM)</p> <p>I would like to see a revised consultation which includes large sites around Long Ashton, Portishead and the South Bristol Link Road .I would also like to see an independent analysis undertaken to identify sites in those areas and compare them with WsM against the main sustainability objectives.</p>

Name	Organisation	Comment ID	Comment Received
			<p>Paragraph 4.1 This plan is not seeking to enhance the historic environment or protect heritage assets and their settings - it seeks the opposite . The proposal for Walliscote Place in WsM seeks to demolish the Victorian buildings (Roselawn and central chambers) located next to the Old Town Hall . The Old town hall is a listed building as is the former magistrates court building on the other side of the road . There are few historic buildings left in the centre of WsM and I do believe that Roselawn and central chambers should not be demolished but should be retained in their own right and to protect the integrity and setting of the heritage buildings around them.</p>
<p>Persimmon Homes Severn Valley</p>	<p>-</p>	<p>3361153//19</p>	<p>Sustainability Appraisal</p> <p>The Sustainability Appraisal Framework Objectives are set out in Table 1 of the document. This identifies six new objectives introduced after the March 2016 documents submitted with the consultation draft of the Site Allocations Plan. Having introduced these new objectives, it would have been helpful if the document had set out an appraisal of how the new objectives have been taken into account and any changes that result from them in this section of the document.</p> <p><u>Specific Comments on Sustainability Appraisal Framework Objectives</u></p> <p>Sub paragraph 2 is an addition to paragraph 3.3 from the March 2016 document and relates to delivery of infrastructure improvement in tandem with major development proposals. It is not clear how major development proposals are defined and also how accessing improvements to Bristol Airport are directly related to any major developments proposed in the Site Allocations Plan. Given this addition, there is a lack of consistency in that Core Strategy Objective 9, Delivery of Major Transport Schemes, is not assessed. Also we consider the Site Allocations Plan has a specific role to play in respect of Core Strategy Objective 4, Ageing Population, particularly in respect of housing provision.</p> <p><u>Results of the Assessment Process</u></p> <p>Paragraph 4.22 says there are sufficient sites to <u>help meet</u> the Core Strategy housing requirement. We have</p>

Name	Organisation	Comment ID	Comment Received
			<p>commented separately on the basis of the housing figure, how this does not comply with National Guidance and that we consider the Site Allocations Plan does not ensure sufficient numbers are identified. This is not helped here where the SA adopts an unambitious objective of merely helping to meet the identified Core Strategy need, rather than reflecting that the figure in the policy is expressed as '<i>at least 20,985</i>' rather than as a precise target.</p> <p>We note that the statement in paragraph 4.22 that '<i>all of the chosen allocated sites are either within or adjacent to a settlement boundary</i>' is not correct because sites at Barrow Hospital and Redwood Lodge clearly are not.</p> <p>Paragraph 4.23 says regard must be had to the need not to saturate the market at Weston-super-Mare, resulting in building rates that are not sustainable in one location. We support that objective, but it is not clear how this was assessed, given that Table 1 of the Site Allocations Plan demonstrates the plan requires an increase at Weston-super-Mare from 3,452 completions between 2006 and 2015 to 9,291 between 2015 and 2026, an increase from 385 per annum to 845 per annum or an increase of 120%.</p>
Mrs R Moss	-	3556961//1	<p>Under Section 39(2) of the Planning and Compulsory Purchase Act (2004) all new plans and specified planning documents must be subject to the process of sustainability appraisal.</p> <p>In respect of the Site Allocations Plan: Publication Draft, while the lpa has prepared a Sustainability Appraisal dealing with residential and employment allocations, as well as Local Green Space, it does not appear to have carried out a sustainability appraisal of strategic gap boundaries, nor any consideration of alternatives.</p> <p>While it is accepted that, on 8 November 2016, the Inspector dealing with the Consequential Changes to the Core Strategy concluded (paragraph 45) that there was no need to revisit Policy CS19 to accommodate the housing requirement of the Plan (to 2026), he specifically noted that the job of setting the boundaries of strategic gaps was one for the Sites and Policies DPD. He also concluded (paragraph 52) that the reference to strategic gaps in Policy CS30, concerning the strategic gap between Weston Villages and Hutton and Locking, should be deleted, but that</p>

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			<p>the explanatory text may refer to the intention to define such gaps in the forthcoming Sites and Policies DPD.</p> <p>It is clear, therefore, that it is the job of the Site Allocations Plan to define the exact boundaries of the strategic gaps and that, in accordance with the legislation, the lpa should be testing how designated boundaries will contribute to sustainable development, and how these compare with alternative boundaries for the gaps.</p> <p>It is relevant that the 2013 consultation draft, while reiterating the policy intentions of CS19, did not include any criteria for defining actual boundaries of strategic gaps in its, then, draft Policy DM48. Nor did the lpa produce any evidence to support the delineation of such boundaries on the proposals map.</p> <p>As a result of uncertainty over the district's strategic housing requirements (following a successful High Court challenge of Policy CS13 of the Core Strategy) the 2013 consultation draft was put on hold and re-issued, as a further consultation draft, in March 2016. In this iteration of the Plan Policy DM48 became Policy SA9 and, while the draft policy contained no criteria for defining boundaries, the accompanying Background Document; Strategic Gaps (March 2016) included, at paragraph 6.1, broad criteria for defining strategic gaps.</p> <p>In its response to comments received on the 2016 Consultation Draft, in respect of strategic gaps, the lpa decided to review its approach to the definition of strategic gaps, including the criteria to be used when defining boundaries. The revised criteria, which is included in the Strategic Gaps Background Paper (October 2016), was published on 7 November 2016 as part of a suite of documents comprising the Site Allocations Plan: Publication Draft. To our knowledge, this document has not been subject to any prior public consultation, or sustainability appraisal, and, thus, remains the untested policy of the lpa.</p> <p>In fact, in an attempt to address criticism over its approach to defining strategic gaps, the lpa has adopted a report commissioned by the former Office of the Deputy Prime Minister, in 2001, entitled 'Strategic Gap and Green Wedge Policies in Structure Plans: Main Report' which, itself, referred to an earlier decision by an Inspector at the Inquiry into the Eastleigh Local Plan (1998) which considered a</p>

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			<p>number of factors as being most useful in delineating strategic gaps. However, the criteria used, which pre-dates the NPPF, has not been robustly tested by the lpa as part of any sustainability appraisal and, at best, can only be regarded as out-of-date guidance on the matter.</p> <p>We submit that the lpa has not properly tested the proposed boundaries of the strategic gaps as part of the process of sustainability appraisal and that, accordingly, the policy is not legally compliant nor in accordance with the NPPF.</p>
R Burrows	-	939361//2	<p>The RAG assessment is disingenuous towards Bleadon Village and thus scores it lower than it should.</p> <p>It states that there are very few job opportunities within the Village. However this can be contested.</p> <p>A brief search lists some 53 businesses operating from Bleadon, with relatively new web based companies such as Eat Tea and Drink Biscuits operating from the business units at Purn House Farm. The recently approved (14/P/0746/F2) Regional Wake Park Leisure facility will bring jobs and so to will the recently approved change of use from car boot to Lodge Park on Accommodation Road (15/P/2304/F). Investment and upgrades to Purn Holiday Park are also being implemented. There are therefore many opportunities in and immediately adjacent to Bleadon Village both now and in the future.</p> <p><i>Environmental dimension: The village is susceptible to environmental sensitivity, due to flood risk and proximity environmentally designated areas(AONB, SSSI) – This is misleading as only part of the Village is sensitive to flood risk. Furthermore the designations of AONB and SSSI are not within the Village but adjacent to it. A recent Appeal which was upheld noted no impact on the AONB by large scale development (15/P/0983/O).</i></p> <p><i>Economic dimension: There are few services provided within the village, no healthcare, leisure centre or supermarket shopping facilities and the nearest store is around 4km away. There is a post office</i></p> <p>The Village has several Public Houses (Catherines Inn, The Anchor Inn, The Queens Arms) that offer food as well as an Indian Restaurant (Indian Masalla) and a Village Store</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>within the afore mentioned Purn House Farm, where the Post Office resides.</p> <p>Weston General Hospital is 1.7miles away and places Bleadon in closer proximity than the vast majority of the population of Weston-super-Mare. Only Uphill, part of Southward, the Bournville and the Coronation being closer.</p> <p>The nearest large supermarket is some distance but does not rule out the sustainability of a place based on the distance from a large store, the village has a store. Given the increase in internet shopping and that the majority of supermarket chains and some of the lesser ones, all deliver to home via online shopping methods this should not impact upon the assessment of a settlement. Planning is about the future and in the future we will see a greater increase in online shopping.</p> <p><i>The nearest rail station is approximately 5km in Weston super Mare and there's an hourly bus service to the town. But only a quarter of people use sustainable travel means for work</i></p> <p>This is incorrect, there are 2 bus services, the 4 / 4a, which is hourly and the 20, which runs along the A370, this is at times a 30 minute service. Combining the two services you can expect a bus within 10 minutes of each other at certain points of the day.</p> <p>The information present in the RAG is therefore misleading, Bleadon is a Village with a lot to offer, is well connected and is above all desirable. It is somewhere where people want to live, yet is prevented in doing so by policy clearly being skewed against the settlement being expanded.</p>

Section

Sustainability of settlement review

Name	Organisation	Comment ID	Comment Recieved
Nailsea Action Group	Nailsea Action Group	14823809//12	<p>Reviewing the sustainability of settlements states that the hierarchy process assumes that towns are “relatively sustainable and are deemed more suitable locations for development (providing this doesn’t cause unacceptable adverse impacts).”</p> <p>We agree with this in principle. However, we disagree strongly that this means that sites on the edges of towns are assumed to be sustainable. This is of particular relevance to Nailsea, where there has been no development on the western edge for many decades, because of its distance from amenities and poor road infrastructure. However, the sustainability assessment appears to disregard the evidence that sites such as West of Engine Lane are not in sustainable locations and the adverse impacts on the local area and landscape. For more detail see our response to the sustainability appraisal.</p>
D. E		15972289//11	<p>It is noted that Long Ashton has the highest percentage of people using sustainable travel for commuting . That is because it has all the connectivity and all the opportunity for people to work locally by means of a short , quick journey into the main employment area of Bristol. This area meets all the sustainability objectives of the SAP and does not have enough (if any) affordable housing.</p> <p>Long Ashton would be the perfect place to release land from the green belt and allow development to take place. I have seen nothing to suggest that green belt protection at all costs is what the government want to promote. The opposite is true in that green belt can be released if this provides the most sustaniable location and provides affordable housing.</p> <p>A cost benefit analysis between Long Ashton , Portishead and surrounds would show that development in this area of North Somerset would carry all the benefits at little cost, whereas further development in Weston would be the reverse as presently most the working population are commuting out for employment and the land has big problems with flooding.</p>

Name	Organisation	Comment ID	Comment Recieved									
Persimmon Homes Severn Valley	-	3361153//20	<p data-bbox="699 331 1447 432">Comments on Background Document ‘Assessing the Sustainability and Settlement Hierarchy of Rural Settlements in North Somerset’</p> <p data-bbox="699 472 1447 678">The document sets out a comprehensive assessment of the sustainability of villages in North Somerset. At this stage it is not possible to comment on the sustainability characteristics or the way they have been assessed for each settlement without carrying out further work. However, using the assessment as presented we have the following comments.</p> <p data-bbox="699 714 1447 1061">Appendix D helpfully sets out in a summary table the relative sustainability of each settlement and presents this as a hierarchy. However, when this hierarchy is compared with the proposed allocations in each village, it is clear that there is no correlation between the sustainability hierarchy and the actual allocations. The document contains no overall sustainability assessment for each village against its potential development. In addition, there is no evidence of how the Appendix D table setting out the relative settlement sustainability this appraisal has been used to identify suitable allocations.</p> <p data-bbox="699 1097 1447 1375">In particular, the document clearly identifies Backwell as the most sustainable village in North Somerset, whereas Churchill and Yatton are identified as environmentally sensitive. In total, Backwell has 6 green RAGs and 2 ambers, Winscombe 1 green and 7 ambers, Churchill 7 ambers and 1 red and Yatton 3 greens, 4 ambers and 1 red. There is clearly no correlation between the sustainability assessment and the allocations for each village, which is further illustrated in the table below.</p> <table border="1" data-bbox="699 1408 1453 1953"> <thead> <tr> <th colspan="3" data-bbox="705 1451 1139 1552">Relative Settlement Sustainability Compared with Total Housing Allocations</th> </tr> <tr> <th data-bbox="705 1599 1193 1653"></th> <th data-bbox="1193 1599 1318 1839">Total RAG Rating</th> <th data-bbox="1318 1599 1447 1839">Proposed Dwellings</th> </tr> </thead> <tbody> <tr> <td data-bbox="705 1839 1193 1953">Backwell</td> <td data-bbox="1193 1839 1318 1953">22</td> <td data-bbox="1318 1839 1447 1953">65</td> </tr> </tbody> </table>	Relative Settlement Sustainability Compared with Total Housing Allocations				Total RAG Rating	Proposed Dwellings	Backwell	22	65
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	Total RAG Rating	Proposed Dwellings										
Backwell	22	65										

Name	Organisation	Comment ID	Comment Recieved		
			Long Ashton	19	0
			Yatton	18	696
			Winscombe	18	199
			Congresbury	17	68
			Easton-in-Gordano/Pill	17	0
			Banwell	15	0
			Churchill	15	219
			Wrington	15	0
			Sandford	15	0
			Locking	15	0
			Claverham	14	0
			Bleadon	13	42
			<p>The October 2016 Review of the sustainability and settlement hierarchy of settlements in North Somerset adopts a more detailed classification adding a plus and minus to each colour thinking producing 9 categories G+, G, G-, A+, A, A-, R+, R,</p>		

Name	Organisation	Comment ID	Comment Recieved																																				
			<p>R-. Allocating 9 for a G+ through to 1 for a R- produces the following results from an extended list of villages:</p> <table border="1" data-bbox="699 501 1461 1919"> <thead> <tr> <th data-bbox="699 501 1038 618"></th> <th data-bbox="1038 501 1267 618">RAG Rating</th> <th data-bbox="1267 501 1461 618">Allocation</th> </tr> </thead> <tbody> <tr> <td data-bbox="699 618 1038 739">Backwell</td> <td data-bbox="1038 618 1267 739">57</td> <td data-bbox="1267 618 1461 739">65</td> </tr> <tr> <td data-bbox="699 739 1038 860">Long Ashton</td> <td data-bbox="1038 739 1267 860">48</td> <td data-bbox="1267 739 1461 860">0</td> </tr> <tr> <td data-bbox="699 860 1038 981">Yatton</td> <td data-bbox="1038 860 1267 981">48</td> <td data-bbox="1267 860 1461 981">676</td> </tr> <tr> <td data-bbox="699 981 1038 1102">Congresbury</td> <td data-bbox="1038 981 1267 1102">48</td> <td data-bbox="1267 981 1461 1102">52</td> </tr> <tr> <td data-bbox="699 1102 1038 1223">Winscombe</td> <td data-bbox="1038 1102 1267 1223">44</td> <td data-bbox="1267 1102 1461 1223">199</td> </tr> <tr> <td data-bbox="699 1223 1038 1344">Churchill</td> <td data-bbox="1038 1223 1267 1344">44</td> <td data-bbox="1267 1223 1461 1344">219</td> </tr> <tr> <td data-bbox="699 1344 1038 1464">Uphill</td> <td data-bbox="1038 1344 1267 1464">42</td> <td data-bbox="1267 1344 1461 1464">20</td> </tr> <tr> <td data-bbox="699 1464 1038 1585">Easton-in-Gordano</td> <td data-bbox="1038 1464 1267 1585">41</td> <td data-bbox="1267 1464 1461 1585">0</td> </tr> <tr> <td data-bbox="699 1585 1038 1706">Banwell</td> <td data-bbox="1038 1585 1267 1706">40</td> <td data-bbox="1267 1585 1461 1706">44</td> </tr> <tr> <td data-bbox="699 1706 1038 1827">Hutton</td> <td data-bbox="1038 1706 1267 1827">38</td> <td data-bbox="1267 1706 1461 1827">0</td> </tr> <tr> <td data-bbox="699 1827 1038 1928">Wrighton</td> <td data-bbox="1038 1827 1267 1928">37</td> <td data-bbox="1267 1827 1461 1928">0</td> </tr> </tbody> </table>		RAG Rating	Allocation	Backwell	57	65	Long Ashton	48	0	Yatton	48	676	Congresbury	48	52	Winscombe	44	199	Churchill	44	219	Uphill	42	20	Easton-in-Gordano	41	0	Banwell	40	44	Hutton	38	0	Wrighton	37	0
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			Sandford	35	0
			Locking	35	0
			Kenn	35	0
			Winford	34	0
			Kewstoke	33	0
			Claverham	31	0
			Felton	31	0
			Bleadon	30	42
			Clave	30	0
			Flax Bourton	29	0
			Dundry	28	0
			<p>Backwell is by far and away the most sustainable village. Applying the points system set out in the October Assessment to the RAG Assessments for each village shows Backwell on 57 points, a full 9 points ahead of the next most sustainable village Long Ashton. And yet the allocation in Backwell is only 65 units, despite there being capacity adjoining the previously defined settlement boundary, without requiring use of Green Belt or landscape designations. The allocation at Churchill (6th</p>		

Name	Organisation	Comment ID	Comment Recieved
			<p>place, 44 points) is 237% above Backwell and at Winscombe in 5th place (44 points) 206% above Backwell.</p> <p>Then, why is it appropriate for no allocations in four of the nine Service Villages or why Yatton, in third place in the hierarchy should accommodate more than three times more dwellings than the next highest allocation?</p> <p>Thirdly Bleadon is 19th in the rankings but is allocated 42 dwellings.</p> <p>We note that four of the Service Villages received a red RAG assessment for being environmentally sensitive and yet two of them (Yatton and Churchill) have substantial allocations, although we note in the revised assessment the environmentally sensitive rating for Churchill changed to amber.</p> <p>Assessment of Appendix C – Facilities Schedule for Rural Villages in North SomersetWe have not carried out a comprehensive assessment of Appendix C, but in the first instance compared Backwell (first in the hierarchy with an allocation of 65) with Churchill (eighth in the hierarchy, 219 allocated). This reveals:</p> <p>Backwell has a pharmacy in the village (green) whereas there is none in Churchill (red)</p> <p>Backwell has a choice of two large supermarkets (the table only identifies one) within 3.5 km (amber) whereas Churchill is assessed as red;</p> <p>Churchill has no other food shops, no non-food shops, no banks or ATM facilities and only one other shop, compared with 14 additional shops in Backwell;</p> <p>Churchill has one restaurant compared with six in Backwell;</p> <p>A facility which is a substantial sustainability benefit in Backwell and the ability to easily access a full range of services and facilities is Nailsea and Backwell Station, whereas Churchill has no access to trains;</p> <p>In addition three of the Service Villages (Claverham, Long Ashton and Yatton) rely on Backwell School for secondary education and Claverham and Long Ashton are reliant on Backwell leisure centre.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>This demonstrates that having ranked the villages in sustainability terms there is no attempt to use this to make allocations according to the local facilities in each village. Neither is there any assessment of the quality of the facilities. There is no identification of key facilities or scoring to give recognition to the relative importance of different facilities. Other than simply listing facilities the only assessment is the distance a facility is from the village. By doing this it accepts that distance to facility affects sustainability, but once classified as being beyond 5 km all facilities are classified the same. Also it does not reflect the distance people will be willing to travel for different facilities. Given the relatively good access to facilities throughout North Somerset these issues may have minimal impact in some cases, but there is no evidence of an attempt to assess this in the sustainability appraisal in order to justify leaving it out.</p> <p>Overall there is absolutely no correlation between the sustainability assessment of villages, sites and the allocations made in the plan. Therefore the plan is unsound.</p>
Cresten Boase		5118977//8	<p>Reviewing the sustainability of Sandford: to say Sandford is 'relatively well-designed ' is an overstatement. Sandford is a linear village, with a number of older farmsteads and buildings having been added to by post-war housing development on either side of the A368,. There is a lack of publicly accessible green space, one small children's playground at Winnowing End on the Southern edge of village, a field previously used for harvest homes and village gatherings is now lost to the 118 dwelling Strongvox development to the North of Greenhill Road, another field also used for village gatherings to the north of the former Railway Inn village pub is now part of the Railway Inn Cider House and Kitchen development. The village hall is directly on the A368, has no parking facility, and no green space attached. There is no village green. The Strawberry Line cycling and pedestrian route on the Eastern edge of the village is publicly accessible and well maintained, but the 'range of open spaces' which are referred to in the assessment is definitely absent. There are few facilities, one convenience shop, limited public transport and jobs, and a high proportion of out-commuting. The nearest service village is Winscombe, over 2.5km away.</p>

Section**Other sites put forward**

Name	Organisation	Comment ID	Comment Recieved
Taylor Wimpey UK Ltd (DLP)	DLP Planning	10410369//1	<p>These representations have been submitted on behalf of Taylor Wimpey in response to North Somerset Council's consultation on the publication version of the 'Sites and Policies Plan Part 2: Site Allocations Plan' (SAP).</p> <p>This document sets out Taylor Wimpey's response to the emerging Site Allocations Plan and supports the promotion of land that Taylor Wimpey has interests in at Land at Grove Farm, Backwell.</p> <p>The site proposed has also been promoted as a suitable location for housing development within the West of England Joint Spatial Plan. A section of the site was also promoted as part of the previous stage of the SAP.</p> <p>Whilst we support the preparation of a Site Allocations Plan for North Somerset we feel that the Council should be allocating additional sites for residential development, particularly in view of the recent appeal decisions and challenges to the Five Year Supply of Housing Land for North Somerset, and in light of the emerging Spatial Plan which is proposing a significant increase in development in North Somerset. We note that once the JSP and the SAP are adopted, the SAP will cover the early phases of the JSP plan period.</p> <p>We accept that the scale of development that can be provided at Grove Farm is in excess of that required to be allocated in the SAP, however to ensure development on the site can be delivered within the JSP Plan period, there is a need for development to commence in 2020. As a result it is possible that the early phases of the development of Grove Farm will fall to be considered within the SAP. If the site is left until the expiry of the SAP before it is brought forward then there is a risk that the site, and the supporting infrastructure will be deliverable within the JSP period.</p>

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			<p>To address this we therefore consider that NSC should be making some form of allocation for the site in the site allocations plan to reflect this and ensure consistency with the emerging strategic guidance.</p> <p>The site is likely to come forward in three phases. Phase 1 being the section of the site immediately adjacent to the Backwell settlement boundary. An Emerging Transport Vision document has been produced by Peter Brett Associates (PBA) for the site and is attached at Appendix 1. This provides a breakdown of the anticipated delivery timescale for the site and is provided below:</p> <p>Phase 1 – delivery of circa. 150 units to 2022 – Transport strategy focusing on local access and walking and cycling connections to local facilities and services and in particular Nailsea and Backwell railway station, which is to act as the development strategic gateway, and supported by improvements to the A370/Station Road junction.</p> <p>Phase 2 – delivery of an additional circa. 300 units to 2028 - delivering a new gateway junction to Backwell from the A370 to the south of the village, providing access to development and allowing land to be safeguarded to support the delivery of a first section of the strategic link from the A370 to Nailsea, plus offering the potential for a sustainable transport link back to Phase 1.</p> <p>Phase 3 – delivery of a further circa. 300 units to 2034 – provision of further safeguarded land to deliver a further section of the link to Nailsea, plus upgrade of new connection through the development to all modes.</p> <p>The phasing highlights that the site is capable of delivering around 350 homes delivered by 2026. Furthermore, it also shows that should development not commence by 2020, then there is a risk it will not deliver it full potential within the period.</p>

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			<p>As we have set out above, we consider that there is an inherent need to allocate more housing in the Site Allocations Plan. Overall, we consider that Backwell is a highly sustainable settlement and is capable of expansion, as highlighted in the Joint Spatial Plan. We consider that the Land at Grove Farm site can make a significant contribution to the housing target and approximately 350 of the 750 are deliverable within the plan period to 2026.</p> <p>The evidence base includes a review of the sustainability and settlement hierarchy of the service villages and infill villages in North Somerset. Of the 22 settlements assessed, Backwell is identified as the most sustainable. The majority of services are included within Backwell itself, with additional services within neighbouring Nailsea to the north. We therefore feel that more housing should be more sites should be allocated at Backwell.</p>
J Milward		10411297//1	<p>Schedule 1 - Schedule to Policy SA1</p> <p>Backwell</p> <p>There is clearly a need for infill housing development to satisfy both the 2026 North Somerset shortfall of 1,700 homes and the West of England shortfall to 2036 of 39,000 homes, of which 3,900 are proposed for Nailsea and Backwell.</p> <p>As I have highlighted before, there is infill potential for sensitive housing development in the Green Belt right on the eastern edge of Backwell. There are a number of agricultural fields abutting the current village development boundary that could easily accommodate new housing without materially affecting the wider landscape character or village appearance. These fields are increasingly redundant for agricultural purposes due to proximity to an increasingly non-urban environment and sustainable housing</p>

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			<p>development would support the local community and would benefit from good public transport links (bus & rail link) as well as proximity to the A370. The fields in question are highlighted by red hatching on Plans 1 and 2 attached. Public utility services (water, electricity) are already in place.</p> <p>In addition, the field annotated "Backwell Hill Field 2" adjoins an existing light industrial warehouse and could be considered for employment use.</p> <p>I again suggest these areas as a solution to the increased housing targets that North Somerset is being asked to satisfy.</p>
Mead Realisations Ltd	Mead Realisations Ltd	1074881//1	<p>Locking Parklands Eastern Extension</p> <p>The site lies directly adjacent to the boundary of an outline planning permission (Ref: 12/P/1266/OT2) for a large mixed-use development that was granted permission in 2015. An application for 250 dwellings on the site itself was submitted in October 2016 and is expected to be determined early in 2017. It is accompanied by Environmental Statement which confirms that the site is an appropriate location for residential development</p>
Mead Realisations Ltd	Mead Realisations Ltd	1074881//2	<p>Land to the North-East of Weston-super-Mare</p> <p>The site is directly adjacent to the recent large scale housing development at St Georges and is therefore a logical location for a residential mixed use development.</p>
Mead Realisations Ltd	Mead Realisations Ltd	1074881//4	<p>Land off Ebdon Road, Ebdon Weston-Super-Mare</p>

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			<p>The southern and western boundaries of the site are formed by the existing residential development, while the northern boundary is formed by Ebdon Road and the eastern boundary by the River Banwell. The Environment Agency Flood Map indicates that the site is within an area benefiting from flood defences and there are no other constraints that would preclude development. It therefore represents a logical location for residential development.</p>
Mead Realisations Ltd	Mead Realisations Ltd	1074881//6	<p>Land at Lynchmead Farm, Ebdon Road Weston-super-Mare</p> <p>The site lies directly adjacent to existing urban edge of Ebdon. The Environment Agency Flood Map indicates that the site is within an area benefiting from flood defences and there are no other constraints that would preclude development. It therefore represents a logical location for residential development.</p>
Gladman Developments Ltd	Gladman Developments	11199745//6	<p>Land south of Knightcott Road, Banwell</p> <p>Gladman Developments are promoting a site at 'Land south of Knightcott Road, Banwell for circa 60 dwellings (see location plan below)</p> <p>Site Context</p> <p>The site is located on the western edge of Banwell. Banwell is located 8km east of Weston-super-Mare on the A371. The 3.51 ha / 8.67 acres site is situated immediately adjacent to existing built development to the west of the village. The site is bound by the A371 Knightcott Road and an individual residential property to the north, open countryside to the south, a mix of existing residential development, associated with Knightcott Gardens directly abuts the eastern boundary. The Council has approved a full application for 10 dwellings (app ref: 15/P/0968/</p>

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			<p>O) on the Western Trade Centre located to the west of the proposal site.</p> <p>The site contains no built structures but there are a number of hedgerows and mature trees within the site and along its boundaries. A single main vehicular access point into the site via Knightcott Road is proposed. An existing Public Right of Way (PRoW) runs diagonally across the site in a north east to south westerly direction, this will be retained and enhanced as part of the site proposal. The site comprises one pasture field which is largely enclosed by hedgerows. Main vehicular access to the site is to be taken from Knightcott Road to the north.</p> <p>The nearest bus stops to the site are situated on Knightcott Road and are in very close proximity to the proposed site access. There are four bus services which operate along Knightcott Road and past the site including the No. A2 (Weston-super-Mare – Bristol Airport), No. 126 (Weston-super-Mare – Wells), No. 134 (Bishop Sutton – Weston-super-Mare) and No. 62 (Locking – Bridgewater). The A2 and 126 services between them provide a half hourly service during the daytime to Weston-super-Mare (Mondays to Saturdays). The No. 126 provides 8 services on Sundays.</p> <p>Banwell is identified as a Service Village in the North Somerset Core Strategy and is capable of accommodating additional residential development over the plan period. Banwell has a good range of local facilities and services. that are within easy walking and cycling distance of the site including: Banwell Primary School, Banwell Buddies Pre School, Banwell Village Hall, Co-operative Supermarket, Banwell News and Post Office, Banwell Community Sports Hall, Banwell Children’s Centre and Youth Centre, Winscombe and Banwell Family Practice, Banwell Pharmacy, Recreation Ground, three churches and two pubs.</p> <p>Gladman are aware of the recently dismissed appeal decision (APP/D0121/W/15/3138816)</p>

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			<p>issued on the 13th October 2016 for a larger application for up to 155 dwellings. However, by reducing the site size considerably and only proposing to deliver residential development on the northern field, it is considered that this will address the concerns of the Inspector raised in in his Decision Letter.</p> <p>1.3 North Somerset Allocations Sustainability Appraisal – Knightcott Road</p> <p>The assessment criteria for the residential site allocations in North Somerset has been carried out assessing each of the potential sites around North Somerset. A traffic light system has been utilised to demonstrate how each individual site performs against the following four Sustainability Appraisal objectives:2. Support communities that meet people’s needs;4. Minimise consumption of natural resources.</p> <p>3. Maintain and improve environmental quality and assets;</p> <p>1. Improve Health and Wellbeing;</p> <p>There are 22 sub-criteria which each individual site has been assessed against including: education, heritage, employment, air quality and open space. The larger SHLAA site ‘Knightcott Road’ (HE1456) scored the following:</p> <ul style="list-style-type: none"> • 8 green scores: Playing pitches within settlement, Health facilities, Nearest town facilities, Heritage, Tidal/fluvial flood risk, Risk of surface water flooding, Bus Transport, Bus Stops. • 10 amber scores: Proximity to public leisure centre, Community facilities, Primary education, Secondary education, Employment, Biodiversity, Landscape, Pedestrian/cycle links, Railway Station, Settlement boundary. • 4 red scores: open space within settlement, PDL/greenfield, Agricultural land class (BMV), Air Quality.

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			<p>It was concluded that the site is situated in open space within the settlement, that it is greenfield site, Best and Most Versatile Land and Air Quality, hence should not be allocated. However, it is noted that the site at Land east of Wolvershill Road site (HE1454) <i>should</i> be allocated for development, despite only achieving a higher score in 2 of the 22 criterion (Community facilities and Landscape). The east of Wolvershill Road site also received a landscape objection during the application process. Moreover, it is noted that the promotion site actually has more ‘green’ scores than the draft allocated site at ‘Land east of Wolvershill Road’.</p> <p>In respect of the other ‘red’ scores, it is inevitable that greenfield sites will need to be developed to meet the Council’s housing need, and the Council have recently approved an outline planning application to the east of Wolvershill Road, Banwell. Furthermore, national policy does not support a sequential approach to the development of brownfield land over greenfield, instead supporting sustainable development to boost significantly the supply of housing. The loss of a small amount of Best & Most Versatile Agricultural Land is insignificant in the context of the wider district, is necessary to meet the Council’s pressing housing need, and should be balanced against the benefits of the proposals as required by paragraph 112 of the Framework.</p> <p>1.4 Housing and Economic Land Availability Assessment</p> <p>A site with a larger red line boundary (which includes the two fields to the south of the proposal site) was assessed in the Council’s Housing and Economic Land Availability Assessment 2014 (HE1456).</p> <p>The site is included within the 2013 SHLAA (ref: SH1220) and 2014 SHLAA (ref: HE1456). The site is considered, in principle, to be suitable and available for residential development over the 5-year period 2019-2024. The HELAA 2014 (HE1456) site appraisal confirms that the site</p>

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			<p>adjoins the settlement limits for Banwell, is available for development, has no ownership constraints, is achievable and is viable for residential development. It also confirms that the site is available within the 5-year supply period.</p> <p>Gladman can confirm that the site is available, offers a suitable location for development now and is achievable with a realistic prospect that the housing will be delivered within five years.</p>
Gladman Developments Ltd	Gladman Developments	11199745//7	<p>Land off Wrington Lane, Congresbury</p> <p>Gladman Developments are promoting a site off Wrington Lane, Congresbury for circa 50 dwellings (see location plan below).</p> <p>The proposal is currently subject to a pending appeal against the non-determination of application 15/P/2828/O (appeal reference 16/P/1521/O15/P/2828/O) which is due to be heard at Public Inquiry in March 2017. The application was submitted and validated in November 2015. An EIA Screening Opinion request was submitted prior to the submission of the planning application; the Council did not issue a response. However, Gladman contend that the application proposals do not constitute EIA development. The appeal was submitted in June 2016.</p> <p>A 'second go' application for the same number of dwellings was submitted in June 2016 and is currently pending determination.</p> <p>Context</p> <p>The 3.42ha site is located on the north-eastern edge of Congresbury. The site comprises a single large agricultural field which is bounded to the north and west by existing residential development and by open countryside to the south and east.</p> <p>Congresbury is a sustainable rural settlement with a good range of services and facilities. Within 1km of the site there is a primary school, grocery</p>

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			<p>store, post office, garden centre, memorial hall, GP surgery, pharmacy, library, recreation ground and public houses.</p> <p>The site has good access to public transport with a bus stop located approximately 500m from the site. The stop is served by service X1 which runs twice hourly between Weston-super-Mare and Bristol, via Congresbury, during Monday-Saturday daytimes. Bristol City Centre can be reached in approximately 30 minutes on this service. The nearest railway station is situated in Yatton, approximately 4km north of the site, and provides onward connections to destinations including London Paddington.</p> <p>The Council have recently resolved to grant permission for an outline application of up to 38 dwellings on a site at Cobthorn Way, Congresbury, a short distance from this site, along with another 14 dwelling application at Venus Street. In doing so they have acknowledged the sustainability of Congresbury to accommodate additional residential development.</p> <p>Congresbury is capable of hosting additional residential growth which will help to sustain and enhance the existing services and facilities in the village. GDL contend that the site at Wrington Lane would be a sustainable site for allocation in the DPD.</p> <p>Development Framework Plan</p> <p>The indicative Development Framework Plan (shown below) demonstrates how Gladman have considered the potential constraints to the site.</p> <p>The indicative Development Framework Plan demonstrates how the site could be designed to take into account the need to mitigate against landscape and visual impacts, while also incorporating ecological corridors to mitigate against impact on bats.</p> <p>SHLAA</p>

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			<p>The site was assessed as part of the Council's 2014 Housing & Economic Land Availability Assessment as part of a larger 8ha site which was assessed as having a potential capacity of 180 dwellings (site reference HE14181). The site was considered to be available and potentially deliverable within the 6-10 year supply. The following constraints were identified:</p> <ul style="list-style-type: none"> • Loss of green fields/ Best & Most Versatile Land; and • Within 5km consultation zone for North Somerset & Mendip Bats SAC-mitigation for bats may be needed. <p>Gladman contend that any harm caused by the loss of less than 3.42ha of BMV land is outweighed by the substantial benefits that the development of this site would bring. The framework plan outlined above shows how the design of the site has been developed to offer substantial amounts of green space, pasture land and bat corridors to ensure that bats are not adversely impacted by any development.</p> <p>Gladman can confirm that the site is available, offers a suitable location for development now and is achievable with a realistic prospect that the housing will be delivered within five years.</p> <p>North Somerset Allocations Sustainability Appraisal – Cobthorn Farm</p> <p>The assessment criteria for the residential site allocations in North Somerset has been carried out assessing each of the potential sites around North Somerset. A traffic light system has been utilised to demonstrate how each individual site performs against the following four Sustainability Appraisal objectives:2. Support communities that meet people's needs;4. Minimise consumption of natural resources</p> <p>Maintain and improve environmental quality and assets; and</p> <p>Improve Health and Wellbeing;</p>

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			<p>There are 22 sub-criteria which each individual site has been assessed against including: education, heritage, employment, air quality and open space. The larger SHLAA site ‘Land to the south of Cobthorn Way’ (HE1481) scored the following:</p> <ul style="list-style-type: none"> • 10 green scores: open space within settlement, playing pitches within settlement, health facilities, community facilities, primary education, nearest town facilities, heritage, tidal/fluvial flood risk, risk of surface water flooding, bus transport. • 9 amber scores: proximity to public leisure centre, secondary education, employment, biodiversity, landscape, air quality, bus stops, railway station, settlement boundary. • 3 red scores: PDL/greenfield, agricultural land class (BMV), pedestrian/cycle links. <p>It was concluded that the site would have an adverse impact on the rural setting of the village, that it is greenfield and BMV, and that it has poor pedestrian and cycle links, hence should not be allocated. However, it is noted that the adjacent site at Land south of Cobthorn Way (HE1422) <i>should</i> be allocated for development due to it being “close to facilities”; although the promotion site is just as close to facilities as the Land south of Cobthorn Way site and utilises the same pedestrian and cycle routes. Moreover, it is noted that the promotion site actually has more ‘green’ scores than the site at Land south of Cobthorn Way.</p> <p>In respect of the other ‘red’ scores, it is inevitable that greenfield sites will need to be developed to meet the Council’s housing need, and the Council have recently approved numerous greenfield sites including around Congresbury. Furthermore, national policy does not support a sequential approach to the development of brownfield land over greenfield, instead supporting sustainable development to boost significantly the supply of</p>

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			<p>housing. The loss of a small amount of Best & Most Versatile Agricultural Land is insignificant in the context of the wider district, is necessary to meet the Council's pressing housing need, and should be balanced against the benefits of the proposals as required by paragraph 112 of the Framework.</p> <p>Conclusion</p> <p>This omission site represents a sustainable and deliverable development option. The reasons for its rejection have been proven to be unsound.</p>
Gladman Developments Ltd	Gladman Developments	11199745//8	<p>Land at Elm Grove Nursery, Locking</p> <p>Gladman Developments are promoting a site at Elm Grove Nursery, Locking for circa 145 dwellings (see location plan below).</p> <p>The proposal is currently subject to an outline planning application (ref 15/P/1205/O). The application was submitted and validated in May 2015. An EIA Screening Opinion request was submitted prior to the submission of the planning application; the Council confirmed that the proposal did not constitute EIA development and thus an Environmental Statement was not necessary. The application is currently pending determination.</p> <p>Context</p> <p>The 6.76ha site is located on the south-western edge of Locking. The site comprises two large agricultural fields intersected by a mature hedgerow running north-south. The site's boundaries are formed by mature trees and hedgerows and there is a small copse in the north-western extent of the site. Disused former nursery buildings stand in the north-eastern corner of the site, near to the point of access off Elm Grove. The site is bounded to the east and north-east by existing residential development, to the north and</p>

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			<p>south by open countryside, and by a caravan park to the west and north-west.</p> <p>Locking is a sustainable settlement on the edge of Weston-super-Mare with a good range of services and facilities. Within 1km of the site there is a primary school, village hall, grocery store, post office, pharmacy, recreation ground, public house, takeaway, and hairdressers. There is also a part-time outreach GP surgery and mobile library service. All of these facilities are easily accessible from the development site via safe walking routes along footpaths adjoining well-lit highways.</p> <p>The site also lies less than 1km from two large Sustainable Urban Extensions which are being developed - Locking Parklands and Winterstoke Village, which will provide an additional 6,000 dwellings over the plan period and beyond. The Weston Villages will also provide a wide range of additional services and facilities including retail, employment and education which will all be within walking/cycling distance of the site and hence will further enhance its sustainability credentials.</p> <p>The site also has good access to public transport with a bus stop located within 400m of the site. Bus services 126 run from Wells to Weston-super-Mare via Locking on an hourly basis Monday-Saturday daytimes. Locking is also served by service A2 which runs roughly hourly Monday-Saturday daytimes to destinations including Nailsea, Bristol Airport and Weston-super-Mare. Railway services to destinations including Bristol and London can be accessed from Weston-super-Mare station which is accessible by bus from the site.</p> <p>Locking is capable of hosting additional residential growth which will help to sustain and enhance the existing services and facilities in the village. Presently, no potential sites for residential development in Locking are proposed in the publication Site Allocations DPD. GDL</p>

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			<p>contend that the site at Elm Grove Nursery would be a sustainable site for allocation in the DPD.</p> <p>Development Framework Plan</p> <p>The indicative Development Framework Plan (shown below) demonstrates how Gladman have considered the potential constraints to the site.</p> <p>The indicative Development Framework Plan demonstrates how the site could be developed taking into account the need to mitigate against landscape and visual impact, and to provide for ecological corridors to mitigate against impact on bats.</p> <p>SHLAA</p> <p>The site was assessed as part of the Council's 2014 Housing & Economic Land Availability Assessment (site reference HE1476), with a potential capacity of 146 dwellings. The site was considered unsuitable on policy grounds as it lies outside the settlement boundary of Locking, as such it is contrary to policy CS33 of the Core Strategy. However, Gladman contend that for the reasons outlined above the site is a suitable and sustainable site for development and should be viewed positively in light of the council's inability to demonstrate a five year housing land supply.</p> <p>Gladman can confirm that the site is available, offers a suitable location for development now and is achievable with a realistic prospect that the housing will be delivered within five years.</p> <p>North Somerset Allocations Sustainability Appraisal – Elm Grove Nursery</p> <p>The assessment criteria for the residential site allocations in North Somerset has been carried out assessing each of the potential sites around North Somerset. A traffic light system has been utilised to demonstrate how each individual site performs against the following four Sustainability Appraisal objectives:2. Support communities that</p>

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			<p>meet people's needs;4. Minimise consumption of natural resources.</p> <p>3. Maintain and improve environmental quality and assets; and</p> <p>1. Improve Health and wellbeing;</p> <p>There are 22 sub-criteria which each individual site has been assessed against including: education, heritage, employment, air quality and open space. The site 'Elm Grove Nursery' scored the following:</p> <ul style="list-style-type: none"> • 9 green scores: primary education, heritage, biodiversity, agricultural land class (BMV), tidal/ fluvial flood risk, air quality, bus transport, bus stops, pedestrian/ cycle links. • 11 amber scores: playing pitches within settlement, proximity to public leisure centre, health facilities, community facilities, secondary education, employment, nearest town facilities, landscape, risk of surface water flooding, railway station, settlement boundary. • 2 red scores: PDL/greenfield, open space within settlement. <p>It is immediately notable that the site performs equally or better on the traffic light system than numerous sites within Service Villages which it is recommended are allocated. However, it is recommended that the site be rejected purely because it lies within an Infill Village and does not conform with the Core Strategy. However, this contravenes national policy, which aims to deliver sustainable development and recognises that all settlements can contribute to this ambition. Sustainable development should be assessed by balancing the harm against the benefits, and it is clear that the Elm Grove Nursery site performs relatively well against the Sustainability Appraisal criteria.</p>

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			<p>In respect of the 'red' scores, it is inevitable that greenfield sites will need to be developed to meet the Council's housing need, and the Council have recently approved numerous greenfield sites. Greenfield sites have also been allowed on appeal within Infill Villages. Furthermore, national policy does not support a sequential approach to the development of brownfield land over greenfield, instead supporting sustainable development to boost significantly the supply of housing. The site also fails against the 'open space within settlement' criterion; however, there is a recreation ground within Locking, open space would be provided as part of the development proposal, and further open space will be provided as part of the Locking Parklands development. As such, it is not considered that the site (or indeed any of the sites in Locking) should fail against this criterion.</p> <p>Conclusion</p> <ul style="list-style-type: none"> • This omission site represents a sustainable and deliverable development option. The reasons for its rejection have been proven to be unsound.
South West Strategic Developments	Grassroots Planning	11221409//1	<p>On behalf of South West Strategic Developments, in connection with the above site (referred to as the site), Grass Roots Planning Ltd have been instructed to lodge representations to the Publication version of the North Somerset Sites Allocations Plan.</p> <p>This letter sets out our opinions on the publication plan and specifically raises concerns we presented within the previous representations in regards to this plan.</p> <p>The Site</p> <p>The proposed development site, which is situated to the north of Oldmixon Road, consists of 12.79 hectares of land.</p>

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			<p>Site History</p> <p>We have previously made representations for our client's site north of Oldmixon Road, Weston-super-Mare to be allocated for development within the Call for Sites 2014, the remitted policies consultation (in December 2015 and September 2016), the main modifications to part 1 of the Site Allocations Plan consultation in March 2016 and the remaining policies and allocations presented in the Site Allocations Plan Part 2 consultation April 2016.</p> <p>The site is subject to application (Ref: 16/P/0150/O). This application is also currently subject to an appeal which is ongoing and the evidence for this is due to be submitted on the 23rd December 2016, this will be relevant to the site allocations DPD in so much as it sets out our full case as to why this site is suitable for development. We cannot provide this in advance of the exchange of evidence date of the 23rd but would be happy to provide this to officers after that date for consideration as part of this consultation stage and allow a fuller understanding of the site to be gained by the future Inspector charged with examining this plan.</p> <p>The application is in outline form with all matters reserved, however a master plan has been prepared to show how a certain number of dwellings could be accommodated on the site without giving rise to adverse effects.</p> <p>Proposed Development</p> <p>The masterplan has recently been amended (see attached appendix). The changes made involve development being removed from the higher parts located on the site to lower levels. As a result, the proposed development for 150 dwellings is now amended to provide up to 130 dwellings. In summary the proposed development aims to provide the following:</p>

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			<p>Up to 130 homes of varying types including 1 and 2 bedroom apartments, and 2, 3 and 4 bedroom houses;</p> <p>30% of this housing will be designated affordable;</p> <p>Extensive levels of open space;</p> <p>Allotments; and</p> <p>New playing pitches with associated changing facilities.</p> <p>As a result of these amendments it is proposed that the description of the development be amended to say the following:</p> <p>‘Outline application for proposed residential development of up to 130 dwellings public open space, allotments, football pitches, changing facilities and ancillary work’</p> <p>The revised boundary plan and Illustrative Framework have been subject to re-consultation early December 2016.</p> <p>Specific Site Allocations</p> <p>We reiterate our previous representations which identified this site north of Old Mixon Road as suitable to accommodate residential development. This stance was previously supported by officers who proposed that it be included as a specific allocation. Core strategy policy CS28 once adopted also supports the principle of development in this location. The forthcoming appeal will focus primarily on the Council’s stance that the landscape impact of developing this site will be unacceptable, this stance was formulated in rwspsc to an earlier master plan for the site.</p> <p>It is our view that this is the only concern precluding the council from including it as an allocation. Concerns raised regarding transport impacts are not valid given that the planning application for this site led to no objections being</p>

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			<p>raised by the highways authority or their professional advisors.</p> <p>In relation to landscape impacts these have been reduced further by the recent changes made to the master plan as shown. This removes development from the higher parts of the site and allows for a larger landscape buffer to be provide to allow a clear boundary to Weston-Super-Mare to be established. The Council have also recently raised the issue of sequential testing in respect to this site and confirmed that the housing and playing pitches proposed fulfil the requirements to provide wider sustainability benefits and accordingly the sequential test and exception tests are complied with. It is our view that this is clearly correct given that the Draft DPD currently proposes that 86.8% of the dwellings proposed are located on sites that lie within flood zones 3 and 2.</p> <p>Many of these other sites lie wholly within flood zone 3. Only part of the site north of Old Mixon Road lies outside flood zone 1. Therefore it is sequentially preferable to many of the sites currently selected in the DPD. Therefore the allocations document is not justified as it doesn't take this matter into account.</p> <p>Therefore we ask the council to reconsider the exclusion of this site from the allocations DPD and include it to better define how the Council can meet its housing needs over the plan period, rather than hoping for Policy CS28 to deliver as yet unidentified opportunities.</p> <p>Emerging Strategic Gap</p> <p>The current draft of the DPD includes the land north of Old Mixon Road within the strategic gap between Weston-Super-Mare and Hutton. Previously this land wasn't included as part of the earlier iteration of this plan. We strongly object to this change.</p> <p>In respect to the Hutton-Weston-Super-Mare gap the March 2016 assessment that supported the</p>

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			<p>previous extent of the emerging strategic gap states the following at paragraphs 7.5 and 7.6:</p> <p>‘The section of the gap between Weston-super-Mare and Hutton, straddling Oldmixon Road, is also relatively narrow (less than 280m wide). There is a wider section (over 600m) between Hutton and the proposed southern extent of Haywood Village currently being developed, part of the Weston urban area, just north of the Cross Rhyne. The sense of this part of the gap can particularly be perceived from Moor Lane that extends northwards from Hutton, crossing a flat relatively open expanse of land which affords views over a wide area.</p> <p>The south western part of the gap can also be appreciated from the public footpath to the south of Oldmixon Road, which marks the southern boundary of the gap. Photo A1 below was taken from that footpath, looking north from a point near Hutton, showing parts of the proposed strategic gap between Hutton and Weston-super-Mare’.</p> <p>We agree that the gap is best perceived from Moor Lane and it can be appreciated from views on the footpath that runs through the AONB to the South of Hutton. As this footpath continues to the west towards Oldmixon the appreciation of the gap diminishes because of intervening vegetation and the foreground tends to be dominated by extensive ribbon development that runs along Oldmixon Road.</p> <p>For this reason we agreed with the extent of the Strategic Gap which excluded the appeal site because: firstly; the ribbon development along Oldmixon Road means that the land behind it is either obscured from public view or viewed in an urban context with these properties in the foreground and industrial land to the north in the background; and secondly, the topography of this land, with high ground on the appeal site’s eastern boundary rising beyond blocks most inter-visibility between the settlements themselves.</p>

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			<p>The ribbon development that runs along Oldmixon Road becomes more fragmented halfway between Hutton and Weston-super-Mare and it was appropriate that this land be included in the strategic gaps because retaining open land to the north and south of this more fragmented development would assist in retaining some sense of separate identity when travelling on Oldmixon Road between the settlements.</p> <p>After the appeal connected to the site north of Old Mixon Road was lodged the council have altered the extent of the Strategic Gap to include the appeal site and land to its north and north east. The justification for doing so is set out at section 4 of an updated Strategic Gap Assessment dated October 2016.</p> <p>Tyler Grange a reputable firm of landscape architects have reviewed this change and their view is that the gap and connected policy is not underpinned by any systematic and current landscape appraisal, and it does not have a specific focus or sole aim of protecting the character of the most 'valued landscape'. As directed by national policy there is a focus on protecting the best or most 'valued landscapes', which Policy CS19 does not purport to do. They are also concerned that the way in which policy CS19 is being applied sets a bar higher than the protection of designated landscapes such as the green belt, which is unsound.</p> <p>The inclusion of the appeal site and some adjacent land was the only change made to the Strategic Gaps as part of this review. This change has been made with no analysis of its implications on housing supply and the potential suitability of part of the gap to provide housing in a highly accessible location in accordance with the thrust of Core Strategy policy CS28.</p> <p>The illustrative master plan has also been amended since the appeal was lodged to further minimise the impact on the strategic gap by removing development from higher ground and</p>

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			<p>providing for a larger, more defensible, landscape buffer along the sites eastern edge as described.</p> <p>The council have identified that from Moor Lane you can see Lynx Crescent and Hutton from the same viewpoint, however these are long distance views and the development proposed as part of this appeal will not significantly change this vista other than by placing housing in front of the large scale commercial buildings behind and drawing forward residential development currently seen at Woodlands Avenue to a practically indiscernible degree.</p> <p>From the public footpath that lies within the AONB to the south of Oldmixon Road the appeal site will sit behind the existing ribbon development that lies along Oldmixon Road in any view taken from these points. This existing development undermines the contribution that this land would make to achieving the aims of policy CS19 which aims to:</p> <p>‘Help retain the separate identity, character and/or landscape setting of settlements and distinct parts of settlements’.</p> <p>The urban edge of Weston-super-Mare, comprising of a commercial estate and 1970’s estate housing, is not of any particularly distinct character and when combined with my assessment that the existing ribbon development along Oldmixon Road provides an urban context and foreground to most of the public views taken of this land it leads us to conclude that protecting it as a strategic gap would achieve little in achieving the aims of policy CS19.</p> <p>Tyler Grange have also raised other concerns in evidence connected to the appeal that we would like to issue to the planning policy department to consider in respect to this DPD. We will do this after the exchange of evidence date of the 23rd and hope it will be taken into account.</p> <p>In conclusion we do not consider that the inclusion of the appeal site and the previously</p>

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			<p>allocated employment site is appropriate. We accordingly request that the council remove this from the emerging strategic gap to avoid a finding that its designation as such is unsound because it has not been underpinned by robust evidence and it will unduly fetter the council's ability to deliver housing in a highly sustainable location.</p> <p>Conclusion</p> <p>We consider that land at Oldmixon Road, Weston-super-Mare, should be included in the list of new allocations for residential development and was considered by officers of the council to be an appropriate location for development. The Council's highways officers have also concluded it is a sustainable location in terms of accessibility.</p> <p>The site was put forward as a new allocation by Officers at the Council in a report to the Executive on the 2nd February 2016. This identified that the site could make a positive contribution to the five year supply and indicates in our view, that the principle of development is acceptable in this location, with the need to focus major growth in Weston-super-Mare.</p> <p>The site was then removed by Councillors on the 2nd February 2016 for the following reason: 'land north of Oldmixon Road, which is in Hutton Parish, is an infill village under the Council's hierarchy policy' . We consider this assertion and reasoning to be flawed.</p> <p>As stated within our previous representations, we consider that there is a significant and serious shortfall in the district with the delivery of housing in North Somerset. As a result there is a justifiable need for a review of some settlement boundaries or a permissive approach to development proposed in sustainable and accessible locations adjacent to settlement boundaries. This is now enshrined in the proposed main modifications to policy CS28, albeit a threshold of 75 units is applied. The site</p>

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			<p>north of Old Mixon Road should now be allocate to provide more certainty in a plan led system as to how the housing requirements of North Somerset, the majority of which is meant to be focused at Weston, will be met.</p> <p>Based on these representations and in light of the emerging Sites Allocations Plan Part 2 we urge the council to consider amending the plan prior to submission to PINs and if they do not ask the Inspector to recommend the required changes to the plan in order to ensure it is found sound.</p>
Clive Hall		11768641//1	<p>GATCOMBE FARM WRINGTON</p> <p>After 5 years of illegal occupation and anti social behaviour endured by neighbours, NSC have issued 6 Enforcement Notices as activities are in breach of agricultural planning permission in the Green Belt.</p> <p>Whilst a continuation of the current situation is abhorrent to us, if at the upcoming Planning Inquiry the Appellant can prove Previous Developed Land (PDL) use we would not object to a housing application subject to an appropriately designed scheme which does substantially less harm to the Green Belt than the current totally inappropriate activities.</p> <p>In view of the recent decisions regarding 2 Garden Centres at Tickenham which are in the Green Belt to dismiss the site as a potential housing site would be premature, pending the Planning Inspector's conclusion of its status.</p>
Ms S Dunn		11809953//1	<p>Living in Wrington near an Industrial unit being used as a travellers site I propose that Gatcombe Farm Industrial unit be proposed for housing as lorries/cars/vans already use West Hay Road far more than that of a housing development. Also much smaller than the huge lorries that pass us on West Hay Road and would also stop North</p>

Name	Organisation	Comment ID	Comment Received
			Somerset council from having to deal with this semi redundant site being used illegally in the past as a cannabis farm/ airport parking/ travellers site.
Moor Park (North Somerset) Ltd (T Roche)	Rocke Associates	11854273//1	<p>Objection is raised to Policy SA 1, the associated schedule of site allocations, and the Proposals Map for reasons that can be summarised as follows:</p> <p>It fails to make adequate and satisfactory provisions to deliver the housing required in the period to 2026.</p> <p>It fails to allocate land at Laney's Drove, south of Weston Business Park, Locking identified on the Plan at Annex 1 (hereinafter referred to as the 'omission site') for residential development, and which is necessary to ensure that satisfactory provision is made to deliver the housing requirement for the CS33 (Smaller Settlements and Countryside) policy area in particular, and the overall requirements for the district during the plan period</p> <p>Both the Core Strategy and the emerging SAP support the allocation of mixed use sites that will deliver housing alongside employment development. Weston Business Park is identified as both a 'proposed' and 'safeguarded' employment site at Weston-super-Mare in the emerging SAP (Schedules 2 and 3 respectively). Allocation of land to the south will simply contribute the residential element to the mix that is currently missing.</p> <p>As set out in the Planning Statement accompanying the application, in policy terms the site is in the area to which Policy CS33 relates since it is outside the development boundary for Weston-super- Mare, as is the existing Weston Business Park that the SAP seeks to protect and expand. However, in locational and functional terms, it is part of Weston-super-Mare and is well positioned to integrate with the new social and community infrastructure that is being</p>

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			<p>implemented as part of the Weston Villages strategic sites, and in particular Winterstoke Village. The accessibility of the site to existing and future services and facilities is clearly illustrated on the plan at Annex 4. It can therefore make a significant contribution to meeting the housing requirement of the CS33 policy area in a location the sustainability credentials of which are commensurate with Weston-super-Mare which is the priority focus for development. In sustainability terms, it should therefore be afforded priority for contributing to delivering the CS33 housing requirement</p> <p>See attachment for full text of representation.</p>
Mactaggart & Mickel Homes (Rocke Assoc)	c/o agent Rocke Associates	11936993//1	<p>It fails to allocate land north of Youngwood Lane, Nailsea identified on the Plan at Annex 1 for residential development, and which is necessary to ensure that satisfactory provision is made to deliver the housing requirement for Nailsea in particular, and the overall requirements for the district during the plan period in general.</p> <p>In the light of the above, the following preliminary conclusions can be drawn:</p> <p>The emerging SAP fails to make satisfactory provision to deliver the revised Core Strategy housing requirement of 1,100 dwellings at Nailsea. An additional, deliverable site is therefore required.</p> <p>Notwithstanding, and without prejudice to, the foregoing, there are constraints affecting the principal allocation at North-West Nailsea, that has been identified as a residential development opportunity for more than 20 years. Moreover, its allocation ahead of the omission site is inconsistent with the sustainability appraisal, and contrary to the Flood Risk Sequential Test. The omission site has a similar capacity, is free from planning policy constraints of Green Belt and Strategic Gap, is not subject to flood risks or overhead pylons, and is the only urban extension</p>

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			<p>site at Nailsea that has certainty of delivery at the present time. Moreover, other proposed new allocations at Nailsea are of uncertain availability, suitability and/or deliverability.</p> <p>The emerging SAP fails to make satisfactory provision to deliver the revised housing requirement for the district as a whole. Considerable reliance is placed on sites that have been historic allocations in the NSRLP and/or in earlier development plan periods, which are clearly subject to delivery constraints. There is little evidence to support their deliverability during the current plan period. In addition, some of the key sites on which it places reliance are of uncertain availability and viability, and offer no certainty of yielding their required housing contribution during the Plan period. No fewer than 20 sites are subject to Flood Risk Assessment, including Sequential and Exception Tests, at the application stage, which it cannot be presumed that they will be able to satisfy, and to do so would be to pre-empt the findings of those assessments.</p> <p>Moreover, in the wake of the increase in the Core Strategy housing requirement, the dwelling yield from some of the allocated sites has been increased significantly beyond previous expectations as set out in the HELAA potential and, in the case of the Weston Villages, the Core Strategy strategic policy, albeit without increasing the development areas. Limited reliance can be placed on these arbitrary and unexplained changes, for which there is a lack of evidence-based justification. In addition, and having regard to the Council's own windfall allowance considered in relation to the required yield from the infill settlements/ countryside, there is likely to be a shortfall in delivery from the latter policy area. Moreover, the provisions for the CS33 policy area effectively introduce an additional windfall allowance beyond that identified for the district as a whole by failing to identify sufficient sites to accommodate the requirement for which provision must be made net of windfalls.</p>

Name	Organisation	Comment ID	Comment Received
			<p>Finally, there is the potential brake on housing delivery at Weston-super-Mare consequential upon Policy CS20, which the CSI acknowledged to be a risk.</p> <p>See attachment for full submission.</p>
Tetlow King (James Durant)		14343521//1	<p>On behalf of our client, who owns a 3.2 hectare parcel of land North of Lyefield Road, Worle, Weston-super-Mare, Tetlow King Planning is instructed to make a representation on the North Somerset Site Allocations Plan: Publication Draft. We have submitted previous representations demonstrating the sustainable credentials of our client's site in relation to the January 2015 Call for Sites consultation which sought to form an evidence base for the Housing and Economic Land Availability Assessment; the consultation on the North Somerset Core Strategy remitted policies in December 2015; the respective consultations on the West of England Joint Spatial Plan: Issues and Options and Emerging Spatial Strategy documents; and the previous consultation on the North Somerset Draft Site Allocation Plan dated April 2016 (reference M15/0213-02).</p> <p>Our client's site is suitable for residential development; this is corroborated by its scoring in the Council's Sustainability Appraisal Site Assessments document in which it scores equal to or higher than ten of the sites which are proposed to be allocated within the Site Allocations Plan.</p> <p>This representation seeks to comment on the soundness of the Publication Version Site Allocations Plan, with reference to our Client's site situated to the North of Lyefield Road, Worle. The representation demonstrates that the failure to allocate our client's site is unjustified and in order for the Site Allocation Plan to be found sound, our client's site should be allocated now. A copy of the site location plan is attached.</p> <p>As stated in our previous representation, the Council should only submit a plan for</p>

Name	Organisation	Comment ID	Comment Received
			<p>examination which it considers is "sound". The National Planning Policy Framework (NPPF) sets out a number of tests which a plan must meet in order for it to be found as sound. As such, the Site Allocations Plan must be positively prepared; justified; effective; and consistent with national policy.</p> <p>The Need for Housing in North Somerset</p> <p>We note a recently allowed appeal at Sandford1 in October 2016, where some significant observations on housing land supply in North Somerset were made. Despite the Inspectors examining the Core Strategy and the Remitted Policies applying a 5% buffer to the Council's Housing Land Supply Figure, this was contested by the Inspector in the Sandford appeal decision, who stated:</p> <p>1 Appeal Reference: APP/D0121/W/15/3139633 – Land to the North of A368 Sandford, North Somerset BS25 5QB</p> <p><i>"The CS annual requirement has not been met for 8 out of the last 10 years. While some fluctuation over the economic cycle is to be expected, it is difficult to avoid the conclusion that this represents persistent under delivery and that a buffer of 20% is applicable. This would result in a 4.48 year land supply with a shortfall of 963 dwellings, based on the supply identified by the Council. On this basis I</i> Page 2 of 4</p> <p><i>conclude that the Council cannot demonstrate a robust 5 year housing land supply"</i> (Paragraph 27, our emphasis).</p> <p>We note that dwelling completions in North Somerset have averaged just 800 homes per year since 2006. The Inspector's Report on the Remitted Policies of the Core Strategy sets an overall target 20,985 homes in North Somerset, representing 1,049 dwellings per year.</p> <p>A second appeal decision in October 20162 highlighted the under delivery and the impact of</p>

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			<p>this shortfall on the need within the district. In that appeal at paragraph 31 as a matter that is agreed by both the Council and appellant, the Inspector states:</p> <p>2 Appeal Ref: APP/D0121/W/15/3138816 - Land south of Knightcott Road, Banwell, Somerset</p> <p><i>"Both main parties agree that the housing requirement over the CS plan period is 20,985 dwellings as provided for by CS policy CS13 or 1,049 dpa. It is also agreed that the relevant period for assessing HLS is 1/4/16-31/3/21. There is a significant shortfall of 2,497 units and that this must be addressed within the next five years (Sedgefield Method)."</i></p> <p>As is discussed below, the Core Strategy emphasises that the focus of new development will be directed towards Weston-super-Mare. The Inspector's recent Report into the Remitted Policies of the Core Strategy (November 2016) allocates up to 6,300 homes towards this area. In light of a record of persistent under delivery in the district, North Somerset Council will need to consider allocating more for residential development to give certainty and to demonstrate that they can meet the objectively assessed need and the shortfall which has arisen in recent years.</p> <p>Residential Site Assessments</p> <p>We welcome fresh evidence published by the Council on the Residential Site Assessments, where our site was issued a red score on just one criterion – that of previously developed land and Greenfield development.</p> <p>Figure 1: Site Assessment Score of Greenways Farm</p> <p>However, we note that there are other sites which have scored worse in the Residential Sites Assessments, and have been allocated in the Publication Version of the Site Allocations Plan. For example, the allocation at the Land at Bridgwater Road is also given a red score against</p>

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			<p>the "PDL / greenfield" category, but scores amber against more criteria than the Greenways Farm site (see below).</p> <p>Figure 2: Site Assessment Score of Land at Bridgwater Road.</p> <p>As a result the plan in its current form is not based on an assessment of the reasonable alternatives. This is considered to be unjustified, and therefore fails the test of soundness established by the NPPF.</p> <p>Windfall Sites</p> <p>We acknowledge that the Council has reduced its figure of Windfall sites by approximately 300 homes. But we still maintain our position that this figure is too high, both in light of a historic under delivery of housing and a revised housing requirement. Windfall development is unpredictable by its very nature, it would be far more beneficial and provides far more certainty that the Council will be able to achieve the proposed housing numbers, if sufficient and sustainable sites, which are also Page 3 of 4</p> <p>deliverable by virtue of them being devoid of any technical constraints, are allocated, this will ensure that the Council will not be challenged on its land supply in the future when assessments are made of the ability for them to meet the minimum housing figure needed per annum in light of any delays or issues which arise on allocated sites.</p> <p>The Publication Version of the Site Allocations Plan therefore does not pass the tests of soundness in relation to being "<i>positively prepared</i>".</p> <p>Housing Distribution and Sustainable Development</p> <p>The North Somerset Core Strategy spatial strategy seeks to focus the majority of new development at Weston-super-Mare, followed by the towns of Clevedon, Nailsea and Portishead</p>

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			<p>and then the nine service villages. This approach seeks to ensure that new residential development is brought forward in the most sustainable locations in the region and in turn, seeks to ensure accordance with the presumption in favour of sustainable development which should be seen as <i>"a golden thread running through both plan-making and decision-taking"</i> as set out in the NPPF.</p> <p>The Publication Draft Site Allocations Plan proposes a number of allocations at villages and in the countryside that are unsustainable. This quantum of dwellings does not accord with the strategy set out within the North Somerset Core Strategy and as can be seen from the fresh residential site assessment, these sites score very poorly in terms of their sustainability.</p> <p>In light of the distribution strategy set out in the North Somerset Core Strategy and the presumption in favour of sustainable development set out in the NPPF, it is therefore considered that the allocations at sites in the countryside and in villages not recognised as service villages is inappropriate and also fail the tests of soundness by virtue of the fact that there allocation is not consistent with national policy or justified.</p> <p>For example, the sites in Churchill score very poorly in the Residential Site Assessment. Considering the lack of services, facilities and transport links within Churchill, the allocation of 424 dwellings in the village is not sustainable; this is fully reflected in the poor scores shown for the Churchill allocations in the Residential Site Assessment. The drafting of the Site Allocations Plan with the proposed level of housing at smaller, less sustainable settlements such as Churchill does not accord with the tests of soundness set out above due to the fact that it fails to accord with national policy on sustainable development.</p> <p>A higher proportion of the housing allocated at such settlements as Churchill, should be allocated</p>

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			<p>at the main settlements in the region by virtue of their sustainable credentials. Weston-super-Mare is the largest and most sustainable settlement in the region. The failure to allocate our client's suitable, sustainable and deliverable site on the edge of the settlement, outside of the Flood Zones and close to local transport, schools and employment is unjustified and we request that the deliverable site should be allocated now.</p>
Redcliffe Homes	-	14394465//1	<p>I write on behalf of Redcliffe Homes to submit representations to the North Somerset Sites and Policies Part 2 Site Allocations Plan Publication Version.</p> <p>GL Hearn submitted representations to the earlier consultation draft of the Site Allocations Plan in April 2016. Since this consultation, the NSC 'Sites and Policies Plan Part 1 Development Management Policies' has been adopted and the Core Strategy Remitted Policies have been subject to examination and the Inspector has found the revised policies sound. The remitted policies are due to be considered by Full Council in January 2017.</p> <p>To set the context to these representations, the Core Strategy was adopted in 2012 following which a challenge in the courts led to the housing requirement being remitted and subject of re-examination based on a fresh assessment of housing needs within the District. However, in the absence of an up to date joint Strategic Housing Market Area assessment, the Council was unable to demonstrate a full objective assessment of housing need as required by the NPPF. As a result, the Inspector tasked with re-examining Policy CS13 concluded that the provisions of the policy should represent an "interim position pending a review of housing requirements and provision which will be based on the findings of the new SHMA. The policy should include specific reference to this review</p> <p>At the time of writing his report the Inspector envisaged that the new SHMA would be</p>

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			<p>published in June 2015 with the Joint Strategic Planning Strategy produced by early 2017, thereby enabling North Somerset Council to plan for a fully NPPF compliant and West of England agreed housing provision. Policy CS13 was to be applied on the basis of that revised figure once adopted with a view to reviewing and adopting a replacement plan to put the requirements of the JSP in place. Should the JSP not be finalised, the Inspector advised the Council to move ahead with a review on the basis of the best information available, including the SHMA to achieve the adoption of the Local Plan review by the end of 2018.</p> <p>The West of England authorities are currently consulting on a draft strategy for the Joint Spatial Plan which will set the development requirements to 2036. The Plan remains in the early stages of preparation with publication of the pre-publication draft expected in Summer 2017, submission to the Secretary of State in early 2018, followed by examination and adoption later that year. The West of England authorities are almost 2 years behind the timetable anticipated by the NSC Local Plan Inspector and therefore the Council must seek to expedite the preparation of its replacement Local Plan to achieve adoption by the end of 2018, broadly in parallel with the JSP.</p> <p>The West of England Authorities have produced a Wider Bristol HMA SHMA (July 2015) which identifies a Full Objective Assessed Need for housing in the wider Bristol HMA of 85,000 dwellings over the period 2016-2036; North Somerset Council will need to review its Local Plan in line with this need.</p> <p>Paragraph 1.3</p> <p>The introduction to the Site Allocations Plan sets out the purpose of the document to identify the detailed allocations required to deliver the Core Strategy, consistent with Government guidance. For the reasons set out in later representations to the Plan, Redcliffe Homes disputes that the</p>

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			<p>allocation policies are sufficiently detailed to be consistent with Government Guidance. The Framework advises local planning authorities to use Local Plans to set out the opportunities for development and clear polices on what will and will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan (paragraph 154). However, NSC has in many cases sought to allocate land on the basis of the planning permission already in place, rather than identifying new opportunities for development. Moreover, where sites are identified for allocation minimal details are provided to dictate the form of development which will be deemed appropriate for that site and ensure the successful delivery of a sustainable form of development consistent with development plan policies and the NPPF.</p> <p>Paragraph 1.4</p> <p>Within the context of the Local Plan review set out above, paragraph 1.4 appears confused. It indicates that the Core Strategy will be reviewed by the end of 2018 with the JSP setting the context to a proposed new North Somerset Local Plan to cover the period 2018-2036. The Site Allocations Plan will therefore be a transitional plan to implement the existing Core Strategy with its content to be reviewed through the new Local Plan</p> <p>This suggests that the Council will be preparing a Core Strategy which would stand in isolation before being superseded by the comprehensive Local Plan review. This Site Allocations Plan will be short lived, presumably becoming obsolete once the new Core Strategy is adopted establishing revised development requirements and a refreshed spatial strategy. NSC will therefore continue to face a period of uncertainty without an up to date comprehensive development plan.</p>

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			<p>Moreover, the Council acknowledges that it currently faces a shortfall against its 5 year housing land requirement based on the Adopted Core Strategy (Revised Policy CS13) and is therefore unable to rely upon its adopted housing policies to determine planning applications. This is a reoccurring issue for the authority which has resulted in the grant of planning permissions by NSC and at appeal for a number of schemes which may not otherwise have been consistent with policy.</p> <p>As a result NSC has struggled to be effective in implementing its spatial strategy, in particular unlocking certain sites in Weston-Super-Mare and the towns of Clevedon, Nailsea and Portishead. Due to under-delivery in these locations, schemes have been brought forward in the service villages and smaller settlements/open countryside to boost housing supply. The Site Allocations Plan acknowledges the important role that the service villages have played in order to achieve a significant uplift in supply and overcome the 5 year land supply shortfall (albeit briefly). During 2016, with the 5 year supply seemingly rectified, the Council has sought to apply the policies of the Core Strategy rigidly, resisting schemes in excess of around 25 dwellings in the service villages. However, in the absence of any improvement in the delivery of sites in the larger towns, NSC recent appeals at Sandford and Banwell have confirmed that the Council is again unable to demonstrate a 5 year supply of housing land.</p> <p>The Council must strive to plan positively for future growth through the early and comprehensive review of the Local Plan by 2018; the production of a separate Core Strategy would undoubtedly confuse decision-makers and delay the adoption of a full Plan</p> <p>Evidence Base</p> <p>Paragraph 3.3</p>

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			<p>The Assessment of the Sustainability and Settlement Hierarchy of Rural Settlements has sought to inform the Site Allocations Plan. The Study advises that the settlement hierarchy serves to categorise settlements to recognise their different roles with the larger more sustainable settlements at the top of the hierarchy. The study is intended to provide a framework to support decision making on future site allocations.</p> <p>As this development plan has been prepared in three parts: Core Strategy; Management Policies; Site Allocations, the Site Allocations Plan must be prepared in accordance with the Adopted Core Strategy. The Core Strategy places the service villages third in the settlement hierarchy, identifying 9 settlements to which the same policy provisions apply. The service villages' vision aims to achieve thriving rural communities and a focal point for local housing needs, services and community facilities by 2026. No distinction is drawn between the relative sustainability of each settlement and indeed had that been a relevant consideration, the Core Strategy should have sought to provide further tiers within the settlement hierarchy. Infill villages are the lowest ranking settlements within the District and the Core Strategy vision supports only small scale, strictly controlled levels of development. Notwithstanding these clear policy provisions, the Site Allocations Plan serves to re-open the appraisal of these villages through the Assessment of the Sustainability and Settlement Hierarchy.</p> <p>Redcliffe Homes would question the need for any further assessment of the relative sustainability of these settlements. The provisions of the Core Strategy policies are clear in terms of guiding development to these locations. Policy CS32 requires the allocation of sites over around 25 dwellings through the Development Plan or Neighbourhood Plan at Service Villages. The suitability of the site for allocation will depend on the relative merits of the site in respect of the policy criteria and other relevant policies of the Local Plan. The Site Allocations Plan is not an</p>

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			<p>appropriate vehicle for reassessing the sustainability of these settlements to accommodate growth. Regardless of any reassessment, Policy CS32 allows for schemes up to around 25 dwellings on the edge of the settlements to be granted planning permission without allocation. Therefore, the reassessment of the sustainability credentials of villages could result in the Council delivering the majority of development at the service villages through the development management process i.e. reacting to planning applications for 25 dwelling schemes in various locations around the edge of these villages, rather than proactively managing the delivery of sites through the allocation of land in the most sustainable and suitable locations.</p> <p>Within the development management process the decision-maker is limited to considering the merits of the application scheme in isolation from any other reasonable alternatives. Once again, to ensure consistency with the NPPF (paragraph 154), NSC should adopt a plan-led approach to decision-making which plans ahead for future development opportunities, rather than reacting to unplanned development.</p> <p>Redcliffe Homes' land interests relate to land south of Cox's Green, Wrington and therefore the findings of the sustainability assessment in respect of Wrington are of particular interest. The assessment highlights that the village is within flood risk zones, although it does not acknowledge that these zones only apply to parts of the village, therefore enabling development to come forward without constraint in other parts of the village. The assessment finds that there has been a decline in retail units within the village since the start of the recession in 2008. In order to sustain a good level of retail activity, the village must support a good size of population, catering for a range of housing needs and all sectors of the community. The Core Strategy Vision aims to achieve thriving communities within the service villages. To award the village with a low score in economic terms due to these factors only serves to compound these problems, effectively</p>

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			<p>mothballing the village by restricting future growth, contributing towards further decline in services and diminishing sustainability. Such an approach runs contrary to the Core Strategy's vision.</p> <p>Wrighton does not benefit from the regular through-traffic and passing trade of a number of the other service villages which straddle busy transport corridors (e.g. Backwell, Yatton, Congresbury, Banwell). Therefore it is</p> <p>arguably even more important that the village is supported through additional housing growth to enable retail units to remain viable to service the community and enable residents to minimise travel by the private car.</p> <p>Policy SA1</p> <p>The housing allocations are dealt with at Policy SA1. The supporting text advises that the identified sites accord with the distribution of growth advocated by the Core Strategy with the majority of growth steered towards Weston and only limited growth at the infill villages at the opposite end of the settlement hierarchy. It highlights the problems associated with the remittance of Policy CS13 for its housing supply and the recent need to grant planning permission for sites on the edge of the service villages to boost supply. These sites are now allocated in the Plan.</p> <p>What is striking about Policy SA1 and the accompanying Schedule 1 is the lack of detail contained within the policy and the allocations. Policy SA1 itself simply states that residential sites of 10 or more units are shown on the Policies Map and set out at Schedule 1, indicating that any specific site-related requirements or key considerations are set out within the Schedule. Schedule 1 presents the allocated sites in a tabulated form providing the site address, the status of the site at April 2016 (i.e. planning permissions granted), remaining capacity and site specific details or notes.</p>

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			<p>One would normally expect the site specific details to impose requirements upon the allocated land, indicating details such as the site capacity, affordable housing expectations, any significant constraints to be addressed, infrastructure requirements and design considerations. However, for many of the sites listed in Schedule 1 the notes only indicate whether the site has been carried forward from the previous Local Plan, represents a new allocation or is allocated on the basis of a current planning permission. There are few examples where any site specific requirements are identified and even where these are established, the brief descriptions lack the substance and precision required to effectively manage the development</p> <p>Although the Development Management Policies Part 1 establishes a wide range of policies of relevance to housing schemes, there remains a need to apply site specific policy requirements to ensure applicants are fully aware of the Council's expectations for the land and to provide the Council with a robust position to negotiate with applicants to achieve a successful development.</p> <p>The Planning Practice Guidance advises local planning authorities when allocating land that "sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)." The Site Allocations Plan clearly falls short of meeting these guiding principles. The NPPF states that it is crucial for Local Plans to provide detail on the form, scale, access and quantum of development for allocated sites (paragraph 157). In the absence of sufficient detail to support the allocations, it is difficult to understand what form of development may be achieved, the suitability of that development within the local context, and the viability of the scheme having regard to infrastructure requirements and the burden of costs on the developer. Accordingly, Redcliffe Homes objects to Policy SA1 and the associated Schedule 1 on the basis it has not been positively prepared and</p>

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			<p>does not accord with national policy in respect of plan making and housing delivery.</p> <p>Redcliffe Homes recognises the steps taken by the Council to respond to the shortfall in short-term housing supply and the valuable role which the service village were able to play in order to boost supply. As a direct consequence of these challenges, Policy CS13 of the Core Strategy sought to increase the allocation of housing to the service villages over the plan period from 800 to 2,100 units, broadly in line with the quantum of additional development permitted either by the LPA or through appeal at these locations.</p> <p>However, North Somerset Council is now seeking to allocate land where planning permission exists as a result of the 5 year land supply issues. A clear distinction should be drawn between the decisions taken by the Council in the absence of a 5 year supply (paragraph 49, NPPF) where its Local plan policies were deemed to be out-of-date and the provisions of Paragraph 14 of the NPPF applied and the plan-making process where</p> <p>decisions on the allocation of land should be taken within the framework of the Local Plan policies and the assessment of all reasonable alternatives through a thorough Sustainability Appraisal.</p> <p>Had the Council not faced the 5 year land supply shortfall, it is reasonable to assume that it would not have granted planning permission for some of the sites at the service villages and appeals would not necessarily have been allowed within the service and infill villages where the scale of development is not aligned with the Council's spatial strategy. Decisions have been taken to address shortfalls in the short-term supply within the context of whether the individual scheme merited planning approval on the basis of its consistency with NPPF policies. This represents decisions taken in a snapshot of time within a different set of circumstances to expedite delivery of housing within the 5 years following the grant</p>

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			<p>of planning permission. It does not necessarily follow that the principle of development on those sites should be confirmed through their allocation in this plan thereby supporting development on the site for the life of the plan. Neither is it necessary to allocate these sites. Indeed, the allocation of the site could alleviate the pressure on those developers to implement the planning permission by removing the imperative to contribute towards the immediate supply of housing.</p> <p>Whilst NSC must clearly acknowledge these planning permissions within their identified supply as commitments, the plan must also recognise that these permissions were granted in the face of a failure of sites in Weston in particular to come forward. Whilst Redcliffe Homes accepts that the housing distribution has been established through the updated Policy CS13, the housing distribution through the settlement hierarchy should not represent ceiling figures, providing the spatial strategy is not prejudiced. Therefore the Council should take a proactive rather than reactive approach towards the identification of new allocations at the service villages based on a thorough assessment of all reasonable alternatives. Such an approach would make significant steps towards meeting the Core Strategy vision to achieve thriving communities in the service villages.</p> <p>In this respect, it is noteworthy that of the sites allocated in the service villages, 48 units are carried forward from the Replacement Local Plan, 807 units benefit from planning permission and 400 units are anticipated from new allocations. The new allocations comprise:</p> <p>Yatton Station – 21 units</p> <p>Moor Lane, Backwell - 65 units</p> <p>Pudding Pie Lane, Churchill – 35 units</p> <p>Land to east of Wolveshill Road, Banwell – 44 units</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>Moor Road, Yatton – 60 units</p> <p>Woodborough Farm, Winscombe – 175 units</p> <p>Of these new allocations, the Council has recently granted planning permission for schemes on the sites at Churchill and Banwell, confirming these site capacities, in response to the re-emergence of the 5 year land supply shortfall. The service villages therefore continue to offer a supply of sites which are capable of boosting the short term supply of housing. A further 20 units are subject to a fresh allocation at the infill village of Uphill.</p> <p>Redcliffe Homes does not dispute that Yatton and Backwell are two of the larger service villages and offer sustainable locations for new development of an appropriate scale. However, Yatton has been subjected to considerable housing development over recent years; Schedule 1 identifies a total of 574 units at Yatton with planning permission in addition to the proposed new allocations at the station and Moor Road. Such levels of growth are markedly higher than Portishead (373 units) and not too dissimilar to Nailsea (815 units), both of which are higher order settlements. Redcliffe Homes would question the soundness of this approach which falls out of step with the Council’s Core Strategy (Policy CS14 – Distribution of New Housing) which beyond Weston directs most additional development to Clevedon, Nailsea and Portishead with only small-scale development of an appropriate scale either within or abutting settlement boundaries or through site allocations to be brought forward at service villages. Within this context, it is unquestionable that the levels of housing directed to Yatton far exceed the expectations of Policy CS14 and therefore the allocation of additional land at Yatton through Policy SA1 is unsound, not positively prepared or justified.</p> <p>Two sites are allocated at Winscombe, 175 units at Woodborough Farm and 24 units at the Chestnuts, south of Sidcot Lane which has been</p>

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			<p>carried over from the Replacement Local Plan and has an outline consent (10/P/0592/O). Winscombe and Wrington are relatively comparable settlements in sustainability terms, albeit Winscombe is a larger settlement with a population of around 4,500 compared with around 2,700 at Wrington. Both are served by primary schools, a range of retail and employment facilities and community activities. NSC's assessment of the settlements scored them relatively similar across a range of categories. Winscombe was only regarded as outperforming Wrington in respect of its environmental sensitivities (due to a lack of Conservation Area or many listed buildings) and that is slightly better served by facilities with more retail units than in 2008 (compared with a decline in Wrington). In all other respects the settlements are well matched. However, the comparable sustainability of the settlements is not reflected in the allocation of land for housing.</p> <p>No new development is directed to Wrington through the Site Allocations Plan and no planning permissions have been granted by the Council to contribute towards supply. Redcliffe Homes has promoted land off Cox's Green to the south east of Wrington through the Site Allocations Plan and submitted a planning application to the Council in June 2016 for 59 units; the application is pending determination</p> <p>The Council's Sustainability Appraisal of sites at Wrington considered four options for development. Land south of Cox's Green was appraised on the basis of an 11 hectare site with a potential capacity of 172 homes. This represents the full extent of Redcliffe Homes' land interests which were duly submitted to the Council for consideration as part of the Call for Sites exercise. However, it is rather misleading to assess the site's suitability on the basis of its comprehensive development, particularly given the knowledge of the current planning application for a much reduced scheme. The site received 7 red scores within its assessment, 5 of which are out of the applicants control and 2 of those are</p>

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			<p>common to all sites in Wrington i.e. proximity to a railway station and secondary school. Therefore if development is to be brought forward at Wrington, these factors must be recognised.</p> <p>The planning application for the reduced scheme has demonstrated that surface water drainage can be adequately addressed and there is no risk of flooding. This addresses the remaining two red scores attributed to the site. Therefore, overall Cox's Green represents the most sustainable option for development at Wrington and is demonstrably capable of enhancing the sustainability of the village through improvements to ecology, landscape, the provision of affordable housing and improved footpath connections to the benefit of all residents. Moreover, the current planning application illustrates that the site is capable of supporting around 60 units with integrated landscaping and public open space to achieve a sympathetic addition to the village</p> <p>The Site Allocations Plan is capable of allocating additional sites at the service villages to take the total supply above the Core Strategy's requirement of 2,100 units. In order to achieve a more equitable balance of housing across the service villages to counterbalance the over-delivery of housing at Yatton, additional allocations should be identified in villages including Wrington to ensure these service villages maintain their status and function as important centres within the rural areas of North Somerset and to boost the rural economy to create thriving and sustainable communities.</p> <p>As detailed above, the approach adopted through the Site Allocations Plan is unsound and flawed. It is not positively prepared or justified; it fails to provide adequate policy provisions for the allocated sites to answer the "where, how and what" questions in respect of their delivery. Policy SA1 fails to provide a robust tool for the delivery of allocations, contrary to the NPPF policies on Plan making and housing delivery.</p>

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			<p>The vast majority of the sites identified for allocation already benefit from planning permission and the allocation of the land through the Plan is therefore questionable in some cases, particularly where planning permission was granted in accordance with paragraphs 49 and 14 of the NPPF to respond to a 5 year housing land supply shortfall.</p> <p>For the above reasons, Redcliffe Homes objects to the Site Allocations Plan, with particular reference to Policy SA1 and Schedule 1 and the omission of Cox's Green, Wrington as an allocation capable of delivering at least 59 dwellings within the Plan period.</p>
Edward Ware Homes	Edward Ware Homes	14402625//1	<p>These representations are made in response to the publication version of the Site Allocations Plan and are submitted by Turley on behalf of Edward Ware Homes Ltd and Mr J Burdge who have interests at two sites in Langford. Attached is a site location plan showing the extent of the land that our Clients control.</p> <p>The sites both adjoin the settlement boundary of Langford and are to the south of the A38 along which lies existing development, including dwellings, a guest house and a pub.</p> <p>The sites are subject to few environmental constraints, although both are within a Bat Habitat area. However, it should be noted that the Bat designation also covers the entirety of the adjoining settlement and any potential impacts can be suitably mitigated. The sites are relatively flat and are not subject to any local or national designations which would inhibit residential development on the site. In addition, there are no other known significant constraints, including flooding, which would affect the potential delivery of residential development on these sites. The Site Allocations Plan evidence confirms this position by stating that "<i>there are no specific planning constraints relating to the site</i>".</p>

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			<p>The two sites benefit from strong existing vegetation along their boundaries and are well contained within the wider landscape of Langford. In addition, both sites sit well within the existing linear form of residential development along Bristol Road. Effectively the development of the two sites would complete the existing linear development along the Bristol Road, and would form complete enclosure along that section of Bristol Road.</p> <p>The northern most of the two sites now benefits from outline permission for up to 43 dwellings (Application Ref. 15/P/1313/O) and is identified as a draft housing allocation within the Sites and Policies Plan, Part 2 (Site Allocations Plan). It should be noted that the development of this site for up to 43 dwellings was considered by a North Somerset Planning Officer to be appropriate and as such recommended approval to the 9th March 2016 Planning Committee. The Planning Committee resolved to grant planning permission. As such, the Council as a whole agreed the site was acceptable for development.</p> <p>The southern most of the two sites has not been identified as a draft housing allocation within the Sites and Policies Plan, Part 2 (Site Allocations Plan) despite being collectively and positively assessed under the same reference as the 15/P/1313/O approved site, Reference NS0029, as shown from the interactive map below (see attachment)</p> <p>Sites and Policies Plan Part 2: Site Allocations Plan</p> <p>The Sites and Policies Plan Part 2: Site Allocations Plan, to which these representations relate, proposes to include one of our Clients' sites as a proposed residential allocation. This allocation is fully supported by our Clients. The site has been demonstrated to be entirely appropriate for residential development for up to 43 homes through the granting of planning permission, Reference 15/P/131/O.</p>

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			<p>As set out above, our Clients’ most southern site has been collectively considered through the Site Allocations Plan’s evidence under the same site reference as our Clients’ northern site (Reference NS0029). As such, given that the Council accept that the most northern site as being appropriate for development (both through the evidence supporting the Site Allocations Plan and through the granting of planning permission), the Council should be accepting the appropriateness of the southern site.</p> <p>However, the southern site is not proposed to be allocated for residential development. In this regard, the only comments/justification for discounting the site within the evidence we presume is that which is set out in the Consultation Statement under "land south of A38 Churchill", and is copied below (see attachment)</p> <p>We consider the discounting of the site and the distinct lack of supporting evidence and justification is not sound. Furthermore, the limited comments provided above are totally unjust.</p> <p>Our Clients’ most southern site is entirely appropriate for residential development given that, when compared to the northern most sites, it has a similar relationship to Langford, is equally well contained in the landscape and has similar limited environmental constraints. This site is therefore also suitable for residential development and should be allocated as such, in order to ensure the District meets its future housing needs.</p> <p>In the light of the above, we would therefore request the following policy revisions:-</p> <p>Policy SA1 refers to the allocation of residential sites of 10 or more units which are identified on the Policies Map and set out in Schedule 1. The Policies Map and Schedule 1 identify the northern site as ‘Says Lane, Churchill’, a site with a capacity of 43 units. The second site, the southernmost area, is also suitable for</p>

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			<p>development with a similar capacity of up to 50 dwellings. It would be appropriate therefore to also include this site in Schedule 1 and allocate for residential development.</p> <p>Policy SA2 of the Allocations Plan sets out the purpose of the settlement boundaries as shown on the Proposals Map. Given that the Proposals Map shows the northern Bristol Road site as a proposed allocation it would be consistent with the proposed policy to include it within the settlement boundary. Furthermore, given the suitability of the southern site for development it too should be included within the settlement boundary for Churchill/Langford.</p> <p>Status and Role of the Site Allocations Plan</p> <p>The purpose of the Site Allocations Plan is to identify detailed allocations required to deliver the Core Strategy requirement (20,985 dwellings between 2006 and 2026). It is accepted that the Site Allocations Plan is a daughter document to the Core Strategy. However, the Site Allocations Plan provides an opportunity to boost significantly the supply of housing, seek to positively address the struggles that the Council are facing in demonstrating a five year housing land supply and address housing needs identified in the published West of England Strategic Housing Market Assessment (particularly the extensive affordable housing needs). 4</p> <p>A ministerial letter to the Planning Inspectorate (19th December 2014) makes it clear that SHMAs are just the first stage in developing a Local Plan and they are not a proxy figure for a final housing requirement. However, the government expects that Councils will have regard to SHMA findings. The ministerial letter states that <i>"the publication of a locally agreed assessment provides important new evidence and where appropriate will prompt councils to consider revising their housing requirements in their Local Plans. We would expect councils to actively consider this new evidence over time and, where over a reasonable period they do not,</i></p>

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			<p data-bbox="868 331 1342 398"><i>Inspectors could justifiably question the approach to housing land supply".</i></p> <p data-bbox="868 439 1453 815">Although the Core Strategy Inspector required an early review of the Core Strategy, the Site Allocations Plan provides an opportunity to explore opportunities to deliver housing growth above the minimum requirement, taking account of the West of England SHMA findings, as suggested above. This would be an appropriate and plan-led response to responding to the findings of the SHMA, rather than a wholesale or immediate ‘first’ review of adopted housing requirement.</p> <p data-bbox="868 855 1453 1411">Furthermore, the West of England Local Authorities are currently collaborating to prepare the Joint Spatial Plan, the distribution of the additional housing allocations between the authority areas has not been established. However, the joint plan must ensure the region’s growth is accommodated in sustainable locations and has identified the A38 transport corridor as a suitable location for growth within the North Somerset area, amongst others. Furthermore, Bristol Airport is in a process of expansion and will therefore be a destination of job growth. This provides greater justification for the positive allocation of appropriate sites that seek to take a longer term and proactive approach to meeting both current and future housing needs.</p> <p data-bbox="868 1451 1378 1478">Housing Requirement and Housing Supply</p> <p data-bbox="868 1518 1453 1966">The revised adopted housing requirement for the district is a minimum of 20,985 over the plan period 2006-2026. As set out in the draft Allocations Plan, 7,995 dwellings have already been completed over the plan period from 2006 to 2015. This leaves a residual requirement of 12,990 to be identified to 2026. Furthermore, given that this figure is expressly stated to be a minimum requirement, it would be prudent for the Council to treat this figure as a minimum and ensure that potential delays and non-implementation of sites does not result in the continuation of a lack of five year supply or</p>

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			<p>indeed, under delivery across the plan period. Consequently, in line with the NPPF's requirement to boost significantly the supply of housing and to ensure a five-year supply is achieved and maintained, the Council should be allocating a greater amount than the minimum required in the Site Allocations Plan.</p> <p>At Table 1 of the draft Allocations Plan the Council states that there will be a supply figure of 21,051 dwellings over the plan period. However, this is just 66 above the minimum requirement and, as set out below the claimed sources of this supply are not fully and robustly evidenced.</p> <p>Table 1 of the Allocations Plan identifies a total potential supply (including completions to date) of 21,051 dwellings, 847 of these are from windfalls, based on past rates. The notes below the table state that "<i>windfall allowance based on past rates is a trend based forecast of small site windfall completions between 2006-2016 rolled forward to the end of the plan period. This is apportioned by area based on previously delivery, with current small site consents deducted to avoid double counting</i>".</p> <p>There is no clear explanation why windfalls have been applied differently across the different areas, or evidence provided to justify and demonstrate how the windfall allowances have been calculated. As detailed above, the Table 1 notes state that they are based on past trends, but the evidence does not go beyond this. 5</p> <p>If a windfall allowance is to be taken into account, full consideration of the yield of dwellings through historic windfall sites should be fully understood, in conformity with Paragraph 48 of the NPPF. Generally a relatively long period should be considered, to understand any existing trends fully. It should also be taken into account that windfalls are an increasingly declining resource, and therefore this should be reflected in the windfall allowance. In line with the NPPF (paragraph 48) authorities should only include windfall sites in the five year supply if</p>

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			<p>they have compelling evidence that such sites will become available. No such compelling evidence has been provided and this level of windfalls should not be relied upon.</p> <p>Table 1 also includes 161 units contributing to the supply from '<i>other large sites with consent (not proposed to be allocated)</i>'. The explanation of what this category of supply comprises, states that these are sites that are expected to be built out before public consultation of the document and those with a permitted development change of use consent that would otherwise be contrary to policy. These sites are not however fully evidenced and it is not clear whether an appropriate non-implementation discount has been applied to them. Without such clarity we question the justification for relying on this level of supply from this source.</p> <p>Schedule 1 also details several sites, without a current consent, carried over from the North Somerset Replacement Local Plan. These sites make a substantial contribution to the Council's claimed supply, for instance, Westacres Caravan Park is stated as having capacity of 100 units; Land north of the A370 with a capacity of 89 units; and Bridge Farm, Bristol Road with a capacity of 73 units. However, these sites do not currently have planning consent and as such, it is not certain that these sites will come forward. Furthermore, these sites have been carried over from the previous Local Plan which was adopted nearly 10 years ago, in 2007. Given that these sites have been allocated for a significant amount of time with no development coming forward, the Council should not be continuing to rely on their contribution to its overall housing needs. These concerns have also been recently raised by the Inspectors dealing with the Examination of the consequential changes to remitted policies and Section 78 appeals.</p> <p>The Council also still relies upon the contribution to housing supply from C2 unit schemes, including for example, 124 units from a proposed</p>

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			<p>care village at Redwood Lodge. However, the PPG (reference ID 3-037-20150320) states that:-</p> <p><i>"Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan."</i> (emphasis added)</p> <p>In North Somerset, the approach to be taken to older people is not clearly set out in the Core Strategy as required by PPG. It is not clear whether the overall housing requirement in the Core Strategy of 20,985, includes provision for the specific needs (and number of C2 units/beds) required for older persons. Unless the Council is able to specifically identify that the full needs for older persons are accommodated within the overall housing requirement and until such time as the approach taken is clearly set out in a local plan (which it is not in either the Core Strategy or in the draft Part 2 Plan) then sites which will provide C2 units should not be included as counting towards the Council's overall housing requirement.</p> <p>Due to the lack of a full evidence base and appropriate justification, informed, constructive comments cannot be made on the above, and consequently the extent of the potential supply. Robust evidence detailing the housing completions and commitments to date should be provided, and broken down by the Areas. This will provide transparency and an understanding of the makeup of the potential supply. In addition, a full explanation and justification for windfalls is required to demonstrate how they can</p> <p>6</p> <p>effectively be relied on as a consistent deliverable supply, in order to contribute to meeting the housing requirement.</p>

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			<p>Nonetheless, given that the Council have made generous assumptions on what level of the identified sites will actually contribute to the supply, that windfalls have been relied upon, that no apparent non-implementation discount has been applied, that old Local Plan sites are carried forward despite concerns about delivery, that C2 uses are shown as contributing to supply, and that the housing figure is a minimum only; we would suggest that the Council should plan to deliver more than a mere 66 additional units above the minimum figure over the plan period. Sites such as our Client's land at Langford that are sustainable, developable and sustainable should be allocated for development, given that the Council has done this for one of the site's, and both areas were assessed together as being developable in the site assessments, there is no reason for the southern Langford site to not also be allocated.</p> <p>Suitability of the Sites for Development</p> <p>The adopted North Somerset Core Strategy identifies Churchill (which includes Langford) as a Service Village, which benefits from a range of existing services and facilities, and remains a sustainable location to accommodate growth.</p> <p>Appendix 1 to the Sustainability Appraisal which comprises part of the consultation documents accompanying the Allocations Plan contains the individual assessment of residential sites put forward for development by developers. Our client's sites were considered as part of a wider area detailed as 'Land at Says Lane' (site ref. NS0029) for which the conclusion was that part of the site should be allocated for housing in the Site Allocations Plan. However, it does not make it abundantly clear why only part of the site is recommended as an allocation, given the assessment set out in Appendix 1 of the Sustainability Appraisal is the same for the entire site reference.</p> <p>As stated above, we presume the Churchill gate comments within the Consultation Document</p>

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			<p>relate to our Clients' most southern site. The Council appear to be using landscape impact as a reason for discounting the site. This is clearly at odds with the assessment at Appendix 1 of Sustainability Appraisal which rates the site green set against the landscape sub-objective. Given this conflict and the lack of technical evidence to justify the Council's position, our Clients instructed a desktop study of both of our Clients' sites (Land West of Says Lane (northern site) and South of Bristol Road (southern site)) to determine whether there were any fundamental landscape or visual differences between the two sites in terms of their capacity and suitability for residential development. The findings of this initial desktop study were verified on site by a Chartered Landscape Architect in December 2016.</p> <p>As neither site is covered by any specific landscape planning designation, reference was made to the Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013, Box 5.1, on page 84, which provides a range of factors to help identify the value of non-designated landscapes. This list of criteria is repeated in Table 1, at 1 to 8 inclusive. Other assessment criteria are also included, together with an analysis of how the two sites perform against them (see attachment)</p>
Edward Ware Homes	Edward Ware Homes	14402625//2	<p>These representations are made in response to the publication version of the Site Allocations Plan and are submitted by Turley on behalf of Edward Ware Homes Ltd who have interest in land at Wrington. Attached is a site location plan showing the extent of the land that our Client controls.</p> <p>The site adjoins the settlement boundary of Wrington along three of its site boundaries, and is to the west of Garstons Orchard, a residential area at the south of the village. The site forms a break in the built form at the south of the village, residential development of this area would therefore sit well within the existing form of the</p>

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			<p>settlement, particularly given that the adjoining land uses are currently primarily residential to the west, north and east. The site is within a conservation area, however, it is on the edge of this designation and adjoins modern development to the east. A sensitively designed scheme could sensitively address its context and any heritage impact, and enhance this outer edge of the conservation area through sympathetic design</p> <p>The site is subject to few environmental constraints, although part of the eastern area is within flood zones 2 and 3, this appears to be localised flood risk adjoining a small watercourse which adjoins the site and extends into the village. The site is also within a Bat Habitat area, although this designation also covers the entirety of the adjoining settlement. The site is relatively flat and, unlike other potential growth areas to the north and east of the village is not constrained by Green Belt. The site is capable of delivering circa 40 units suitable of meeting the future housing requirements of the District without having adverse impact on the landscape and heritage setting of the village or involving any loss of Green Belt.</p> <p>Sites and Policies Plan Part 2: Site Allocations Plan</p> <p>The Sites and Policies Plan Part 2; Site Allocations Plan to which these representations relate proposes to allocate sites to achieve the development set out in the Core Strategy. Our Client's site is in a sustainable location adjoining the settlement boundary of a Service Village and should, therefore be included as a residential allocation in this Plan to contribute to meeting the housing requirements of the District.</p> <p>In the light of the above, we would therefore request the following policy revisions:-</p> <p>Policy SA1 refers to the allocation of residential sites of 10 or more units which are identified on the Policies Map and set out in Schedule 1 which details all large sites of 10+ dwellings included</p>

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			<p>within the Council's supply. Schedule 1 does not, however, include any residential sites at Wroughton. Given the need to meet the housing requirements of the District we would suggest that this sustainable site, outside of the Green Belt, at sustainable location should be considered for development.</p> <p>Policy SA2 of the draft Allocations Plan sets out the purpose of the settlement boundaries as shown on the Proposals Map. The Proposals Map shows the existing settlement boundary of Wroughton as excluding our client's site despite the fact that the boundary nearly entirely encases the site. As can be seen from the Proposals Map extract below, to extent the boundary to include this site would enable development in a very logical location in relation to the existing built form of the settlement.</p> <p>Status and Role of the Site Allocations Plan</p> <p>The purpose of the Site Allocations Plan is to identify detailed allocations required to deliver the Core Strategy requirement (20,985 dwellings between 2006 and 2026). It is accepted that the Site Allocations Plan is a daughter document to the Core Strategy. However, the Site Allocations Plan provides an opportunity to boost significantly the supply of housing, seek to positively address the struggles that the Council are facing in demonstrating a five year housing land supply and address housing needs identified in the published West of England Strategic Housing Market Assessment (particularly the extensive affordable housing needs).</p> <p>A ministerial letter to the Planning Inspectorate (19th December 2014) makes it clear that SHMAs are just the first stage in developing a Local Plan and they are not a proxy figure for a final housing requirement. However, the government expects that Councils will have regard to SHMA findings. The ministerial letter states that <i>"the publication of a locally agreed assessment provides important new evidence and</i></p>

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			<p><i>where appropriate will prompt councils to consider revising their housing requirements in their Local Plans. We would expect councils to actively consider this new evidence over time and, where over a reasonable period they do not, Inspectors could justifiably question the approach to housing land supply".</i></p> <p>Although the Core Strategy Inspector required an early review of the Core Strategy, the Site Allocations Plan provides an opportunity to explore opportunities to deliver housing growth above the minimum requirement, taking account of the West of England SHMA findings, as suggested above. This would be an appropriate and plan-led response to responding to the findings of the SHMA, rather than a wholesale or immediate 'first' review of adopted housing requirement.</p> <p>Furthermore, the West of England Local Authorities are currently collaborating to prepare the Joint Spatial Plan, the distribution of the additional housing allocations between the authority areas has not been established. However, the joint plan must ensure the region's growth is accommodated in sustainable locations, including sites within the North Somerset area. This provides greater justification for the positive allocation of appropriate sites that seek to take a longer term and proactive approach to meeting both current and future housing needs.</p> <p>Housing Requirement and Housing Supply</p> <p>The revised adopted housing requirement for the district is a minimum of 20,985 over the plan period 2006-2026. As set out in the draft Allocations Plan, 7,995 dwellings have already been completed over the plan period from 2006 to 2015. This leaves a residual requirement of 12,990 to be identified to 2026. Furthermore, given that this figure is expressly stated to be a minimum requirement, it would be prudent for the Council to treat this figure as a minimum and ensure that potential delays and non-implementation of sites does not result in the</p>

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			<p>continuation of a lack of five year supply or indeed, under delivery across the plan period. Consequently, in line with the NPPF's requirement to boost significantly the supply of housing and to ensure a five-year supply is achieved and maintained, the Council should be allocating a greater amount than the minimum required in the Site Allocations Plan.</p> <p>At Table 1 of the draft Allocations Plan the Council states that there will be a supply figure of 21,051 dwellings over the plan period. However, this is just 66 above the minimum requirement and, as set out below the claimed sources of this supply are not fully and robustly evidenced.</p> <p>Table 1 of the Allocations Plan identifies a total potential supply (including completions to date) of 21,051 dwellings, 847 of these are from windfalls, based on past rates. The notes below the table state that <i>"windfall allowance based on past rates is a trend based forecast of small site windfall completions between 2006-2016 rolled forward to the end of the plan period. This is apportioned by area based on previously delivery, with current small site consents deducted to avoid double counting"</i>.</p> <p>There is no clear explanation why windfalls have been applied differently across the different areas, or evidence provided to justify and demonstrate how the windfall allowances have been calculated. As detailed above, the Table 1 notes state that they are based on past trends, but the evidence does not go beyond this.</p> <p>If a windfall allowance is to be taken into account, full consideration of the yield of dwellings through historic windfall sites should be fully understood, in conformity with Paragraph 48 of the NPPF. Generally a relatively long period should be considered, to understand any existing trends fully. It should also be taken into account that windfalls are an increasingly declining resource, and therefore this should be reflected in the windfall allowance. In line with</p>

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			<p>the NPPF (paragraph 48) authorities should only include 4</p> <p>windfall sites in the five year supply if they have compelling evidence that such sites will become available. No such compelling evidence has been provided and this level of windfalls should not be relied upon.</p> <p>Table 1 also includes 161 units contributing to the supply from ‘<i>other large sites with consent (not proposed to be allocated)</i>’. The explanation of what this category of supply comprises, states that these are sites that are expected to be built out before public consultation of the document and those with a permitted development change of use consent that would otherwise be contrary to policy. These sites are not however fully evidenced and it is not clear whether an appropriate non-implementation discount has been applied to them. Without such clarity we question the justification for relying on this level of supply from this source.</p> <p>Schedule 1 also details several sites, without a current consent, carried over from the North Somerset Replacement Local Plan. These sites make a substantial contribution to the Council’s claimed supply, for instance Westacres Caravan Park is stated as having capacity of 100 units; Land north of the A370 with a capacity of 89 units; and Bridge Farm, Bristol Road with a capacity of 73 units. However, these sites do not currently have planning consent and as such, it is not certain that these sites will come forward. Furthermore, these sites have been carried over from the previous Local Plan which was adopted nearly 10 years ago, in 2007. Given that these sites have been allocated for a significant amount of time with no development coming forward, the Council should not be continuing to rely on their contribution to its overall housing needs. These concerns have also been recently raised by the Inspectors dealing with the Examination of the consequential changes to remitted policies and Section 78 appeals.</p>

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			<p>The Council also still relies upon the contribution to housing supply from C2 unit schemes, including for example, 124 units from a proposed care village at Redwood Lodge. However, the PPG (reference ID 3-037-20150320) states that:-</p> <p><i>"Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan."</i> (emphasis added)</p> <p>In North Somerset, the approach to be taken to older people is not clearly set out in the Core Strategy as required by PPG. It is not clear whether the overall housing requirement in the Core Strategy of 20,985, includes provision for the specific needs (and number of C2 units/beds) required for older persons. Unless the Council is able to specifically identify that the full needs for older persons are accommodated within the overall housing requirement and until such time as the approach taken is clearly set out in a local plan (which it is not in either the Core Strategy or in the draft Part 2 Plan) then sites which will provide C2 units should not be included as counting towards the Council's overall housing requirement.</p> <p>Due to the lack of a full evidence base and appropriate justification, informed, constructive comments cannot be made on the above, and consequently the extent of the potential supply. Robust evidence detailing the housing completions and commitments to date should be provided, and broken down by the Areas. This will provide transparency and an understanding of the makeup of the potential supply. In addition, a full explanation and justification for windfalls is required to demonstrate how they can effectively be relied on as a consistent deliverable</p>

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			<p>supply, in order to contribute to meeting the housing requirement.</p> <p>Nonetheless, given that the Council have made generous assumptions on what level of the identified sites will actually contribute to the supply, that windfalls have been relied upon, that no apparent non-implementation discount has been applied, that old Local Plan sites are carried forward despite concerns 5</p> <p>about delivery, that C2 uses are shown as contributing to supply, and that the housing figure is a minimum only; we would suggest that the Council should plan to delivery more than a mere 66 additional units above the minimum figure over the plan period. Sites such as our Client's land at Langford that are sustainable, developable and sustainable should be allocated for development, given that the Council has done this for one of the site's, and both areas were assessed together as being developable in the site assessments, there is no reason for the southern Langford site to not also be allocated.</p> <p>Suitability of the Sites for Development</p> <p>The adopted North Somerset Core Strategy identifies Wrington as a Service Village, which benefits from a range of existing services and facilities, and remains a sustainable Service Village to accommodate growth.</p> <p>Appendix 1 to the Sustainability Appraisal which comprises part of the consultation documents accompanying the draft Allocations Plan contains the individual assessment of residential sites put forward for development by developers. Our client's site was considered as an area detailed as 'South of Wrington' (site ref. NS0120) for which the conclusion was that the site should not be allocated for housing in the Site Allocations Plan. The reasons given for not allocating the site was that it would intrude into the rural setting of the village and that roads in the village are too narrow. We disagree with this assessment and</p>

Name	Organisation	Comment ID	Comment Received
			<p>raise the fact there is a distinct lack of evidence to support discounting the site.</p> <p>Sufficient access to the village is achievable and development of the site would not intrude into the surrounding countryside or affect the rural setting of the village as there is existing development along three sides of the site currently, as identified above, the site would logically fit well into the existing settlement form and deliver much needed housing in this village.</p> <p>There are no public rights of way within the site and no public access to this area. A small scale scheme of circa 40 units could enhance this area by providing an element of public open space, including potentially allowing public access to the river area.</p> <p>Overall the site is suitable for development, the Council's assessment of the site considered that it has a capacity of around 40 units and it is in a sustainable location, adjacent to the settlement boundary of a service village.</p> <p>Conclusion</p> <p>The potential for the site to deliver around 40 dwellings is development of an appropriate scale for this settlement which would make efficient use of each site and fit well into the surroundings. The development of this site would result in benefits to the local community in the form of high quality new homes, including affordable housing, support for local services and the creation of public open space.</p> <p>The identification of sites which are suitable, available and deliverable is important to ensure that housing needs are met, as well as supporting community infrastructure. This site is suitable, available and deliverable.</p>
CSJ Planning (Ben Larcombe)	CSJ Planning Consultants Ltd	14574657//3	Site V2, Harbour Road, Portishead Quays, Portishead

Name	Organisation	Comment ID	Comment Received
			<p>Policy SA1: Housing</p> <p>Policy S1 states that residential sites of 10 or more units are shown on the Policies Map and set out at Schedule 1 together with any specific site-related requirements or key considerations to take into account.</p> <p>The V2 – Portishead Quays site has a relatively extensive planning history, with an extant reserved matters consent (07/P/1146/RM) that is implementable in light of a material start in operations following the granting of Reserved Matters. 07/P/1146/RM consented the ‘erection of a 5 storey mixed use building comprising: restaurant, kitchen, 7 staff residential units and commercial B1, A1, A4 and A5 uses with parking for 19 cars’. This Reserved Matters application was submitted pursuant to Outline application reference 00/P/1844/OT2 which consented ‘Housing development, primary school, open space provision, and associated infrastructure’. Whilst a material start was made on site, the development has not been implemented and the desire to an alternative use of the site is now considered to be appropriate.</p> <p>It is considered that in light of these mitigating circumstances, and Portishead’s designation as a location for significant growth within the Core Strategy and Site Allocations Plan period, the V2 Site would be an appropriate location for the allocation of a mixed-use scheme, with active ground floor</p> <p>uses and residential dwellings within the upper storeys. It is considered that a building of a similar scale as to that consented by 07/P/1146/RM would be appropriate in this instance.</p> <p>The draft Site Allocations Plan states that the Plan has been prepared to deliver the residential allocations required to meet the now established housing requirement prescribed by Policy CS13 of the Core Strategy. In light of recent appeal decisions upon which it has been demonstrated that the Council are unable to demonstrate the</p>

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			<p>requisite Five Year Housing Land Supply, this assertion is contested, and the consideration and incorporation of further allocated sites, especially within locations that are highly sustainable and designated for significant growth over the Plan period is wholly recommended.</p> <p>In light of this, the inclusion of the V2 – Portishead Quays site within the North Somerset Site Allocations Plan (2006 – 2026) as a Proposed Residential Site, with the retention of an active ground floor use, is recommend for inclusion within the North Somerset Site Allocations Plan 2006 – 2026.</p>
Nailsea Unit Trust (c/o Ellandi LLP)	-	14604993//1	<p>Savills (UK) Limited (Savills) act on behalf of Ellandi LLP (Ellandi) who manage the Crown Glass Shopping Centre in Nailsea Town Centre. This letter is submitted to provide observations in connection with the North Somerset Sites and Policies Plan Part 2 – Site Allocations Plan Submission Version consultation document and to put forward a site for allocation by the forthcoming Plan.</p> <p>We have previously submitted a separate site for retail led development that has not been included within the Site Allocations document as we understand that no sites beyond employment and housing uses are to be allocated through the Part 2 Plan. This representation therefore seeks to include the allocation of an alternative area of land at the Crown Glass Shopping Centre for residential development with mixed retail / restaurant uses at ground floor level. The details of the site are discussed below.</p> <p>Context to Representations</p> <p>By way of background, Ellandi was formed in 2008 and is a leading specialist shopping centre investment and asset manager. Ellandi’s approach is to proactively transform the towns in which it invests by working with occupiers and other stakeholders to ensure that its shopping centres</p>

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			<p>perform a successful and vibrant role for the local communities that they serve</p> <p>The Crown Glass Shopping Centre in Nailsea is the principal shopping facility for the town of Nailsea and provides circa 8,000 sq m of single level retail accommodation and 3,800 sq m of offices around a pedestrianised central square. The Centre is anchored by a number of national multiple retailers including Boots, Costa Coffee, Iceland, Superdrug, WHSmith, New Look and the Post Office. Waitrose is also situated within the Centre (although this is within separate ownership) and the Centre plays host to three markets; the Nailsea Farmers' Market, Bert & Gerts Craft Market and the weekly Tuesday Market.</p> <p>Ellandi has made a number of positive steps towards improving the health of Nailsea since acquiring the Crown Glass Shopping Centre. This includes securing new occupiers, delivering 28 new homes which are owner occupied, the refurbishment of The Sion in order to provide improved office accommodation, the refurbishment and extension of the Glass Maker Public House, provision of new children's equipped playspace and maintenance works to repair roofing at Crown Glass Place. The scheme is also been rebranded and for the last three years has supported the #winashop initiative – a partnership between Ellandi, Nailsea Town Council and the Nailsea Chamber of Commerce which offers local entrepreneurs the opportunity to win a shop at the Crown Glass Shopping Centre (rent free for a year) plus free mentoring help and support from local financial, banking, retail and marketing experts.</p> <p>Ellandi wishes to build upon the positive steps that have been made to the Centre in recent years and recognises that a crucial part of doing so is to engage in the plan making process. Indeed, the development plan framework is critical to giving investors such as Ellandi the confidence to continue investing in and making positive</p>

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			<p>enhancements to the vitality and viability of its centres.</p> <p>It is with the above in mind that we wish to make a number of observations in regard to the Sites and Policies Plan Part 2: Site Allocations Plan Submission Version. These observations follow our representations of 28th April 2016 in respect of the Consultation Draft of this Plan.</p> <p>Proposed Site Allocation</p> <p>The Crown Glass Centre is located within the existing Nailsea Town Centre boundary and serves the needs of Nailsea residents and those visiting the town. Ellandi is committed to further enhancing and improving the offer of Nailsea for the benefit of the local community both now and in the future. It is therefore necessary that the site allocation plan includes land for potential expansion of residential uses within the town centre. This will ensure that due regard is had to the Crown Glass Centre in the Council's consideration of relevant applications and as an integral part of the emerging Sites and Policies Plan.</p> <p>It is with the above in mind that Ellandi seek allocation of the former petrol filling station and immediate environs to the south of the medical centre for residential development (see enclosed plan – Enclosure 1). This allocation would be subject to agreement with the Council on detailed design considerations but the principle of development in this location has already been set through a previous, now expired, planning permission (please refer to Enclosure 2). The the acceptability of residential development in principle should therefore be identified now.</p> <p>It is considered that the application site could deliver circa 30 apartments in a structure of four domestic storeys. It might be that the number of homes reduces if retail / leisure uses are included at ground floor level as previously approved.</p>

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			<p>Development of the Site will assist in meeting the housing requirement identified for Nailsea in a highly sustainable location.</p> <p>Ellandi is currently preparing designs for a revised residential development for this site and would therefore respectfully ask that it is included as an allocation within the final Part 2 Plan.</p>
Mr. Richard Hayes		14823201//1	<p>This development brief has been prepared to promote housing development at the site on behalf of the Hayes family. A representation for the site was promoted on the previous consultation on the North Somerset's Site Allocation Plan 2016 which was prepared to justify that the site is deliverable and should be included in the settlement boundaries of Weston-Super-Mare having the potential of providing 115 units including 30 affordable over the next 2-5 years.</p> <p>2. In the draft plan both the Mead site and the Hayes land was excluded from the settlement boundary.</p> <p>3. The Mead Land has now been included within the settlement following an application for 250 houses (15/P/1646/0) which has gone to non-determination appeal.</p> <p>4. The Committee subsequently confirmed as part of the appeal process, that if they had addressed it, it would have been a resolution to grant. 12th October 2016 Planning and Regulatory Committee.</p> <p>5. This significantly changes the context of the Hayes Land, which should be brought forward.</p> <p>6. In the Council's response to the representation, no issues of principle were raised, save an application having to address noise, nature conservation and green buffer.</p>

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			<p>7. All of these issues are capable of design mitigation and the site should be included in the settlement boundary.</p> <p>8. The Draft representation brief shows a green buffer retained along the M5 and the planted boundaries east/west can be retained and enhanced the ecological corridors. Noise can easily be overcome with planting as shown in the Mead application.</p> <p>9. Whilst the representation of this proposal was not taken forward, the northern parcel of land immediately adjacent (the Mead land) has been put forward and included in the new settlement boundary, extending the settlement boundary of Weston-Super-Mare to the M5. This land is at appeal for 250 houses but the Committee has resolved that they would have granted if not appealed against non-determination.</p> <p>10. This leaves solely our site excluded from the south-east boundary of Weston-Super-Mare to the west of the M5, and with the major change of context and circumstances arising from the Mead land, the Hayes's site should now be included in the settlement boundary being capable of addressing the issues of noise, buffer and ecology and meeting the increasing housing need in the area.</p> <p>Site Location</p> <p>The site is located to the west of the M5 motorway and east of Parklands an existing development under construction as part of the Weston Villages supplementary planning document. It comprises two parcels of land, one of which is used as a paddock and the other a field. Both sites are too small for productive agricultural use and have a western boundary with existing and under construction housing.</p> <p>Key Strategic Objectives</p>

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			<p>Include the site into the settlement boundary by aligning the settlement boundary logically along the M5</p> <p>Retain a significant element of green planted buffer zone to M5 corridor within the settlement boundary being a continuation of that shown in the Draft representation</p> <p>Retain existing mature boundaries and trees</p> <p>Promote housing on the edge of existing settlements such as this site within close proximity of existing facilities – healthcare, education, shops, jobs, public transport</p> <p>Include links to the countryside</p> <p>Deliver a range a mix of housing including affordable housing</p> <p>Ensure sustainable urban drainage is the basis of development</p> <p>Create a new access to the A371</p> <p>Include footpath links to surrounding residential areas</p> <p>Access</p> <p>There is an existing track entrance here which can be formalised to serve the development.</p> <p>A technical drawing has been prepared showing that a 5.5m road with adjoining 1.8m footpath can link the two parcels of land.</p> <p>There is an existing pinch point where both sites meet the motorway embankment, but this can be accommodated by either a widening without affecting the embankment or a 3.2m traffic ‘gateway’ which would act as a traffic calming measures, with priority leaving the site. This design feature means the site could be designed to a speed of 20mph or a home zone approach.</p>

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			<p>Access can also facilitate a new linear footpath link along the M5 corridor providing amenity access to the countryside for proposed and existing residents.</p> <p>115 units can be accommodated off a main spine road through the site, with smaller cul-de-sacs creating smaller development parcels.</p> <p>Footpath links are also achievable through the Parklands development to provide shorter pedestrian access to schools, shops, and bus stops and integrate the houses with the wider area. These links would also provide access to the countryside and Banwell for adjoining households.</p> <p>Landscape</p> <p>1.6 ha of green undeveloped land is proposed along the boundary on the M5 with significant buffer areas of up to 50 metres retained. In this vein, the proposal does not wholly conflict with the policy promoted for Parklands development whereby a 'green buffer' to the west of the M5 should be provided.</p> <p>This area can include significant new tree planting as a green asset to views on the M5 (it can be completely screened as opposed to existing open views to the housing being constructed) and a screen and noise baffle for the future residents of this site.</p> <p>This green setting also allows the creation of informal open space and small play or trim trail facilities to be included for residents to complement their own private gardens.</p> <p>The western boundary of the site and existing hedgerows will be retained and incorporated as features of the layout.</p> <p>The site is mown grassland, but there is one existing mature tree in the heart of the site. This tree should be retained and can form a focal point for a small green with a small parcel of</p>

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			<p>development around it. A village green style could be delivered by the detailed design to maximise the amenity value of this existing resource.</p> <p>Sustainability</p> <p>The development can deliver energy efficient homes, PV solar panels and increase biodiversity with a detailed planting plan, including species rich plants and trees and introducing new habitats.</p> <p>Sustainable urban drainage will also be a key feature, with small swales incorporated on the western boundary and potential for water based ecology features within the layout.</p> <p>Development</p> <p>We believe that the current proposals map should include this site in the proposed residential sites and form a parallel settlement boundary to the M5, aligning with the mead site which has now been included within the settlement boundary.</p> <p>It makes no sense to treat this site differently leaving it outside the boundary and not aligned parallel with the M5. proposed settlement boundary is acceptable given that Core Strategy Policies CS29 and CS30 allows development beyond Weston-Super-Mare settlement boundaries to be below 75 dwellings.</p> <p>This provides opportunities to create a vital mix of starter homes up to executive family housing. All parcels of land would be landscaped and provide a high quality of design and amenity space. Gardens can back onto existing residents to avoid overlooking, and housing can front the access road with spurred off cul-de-sacs where the site widens.</p> <p>In order to facilitate landscape, open space and access, the total site of circa 5.5 ha is reduced to a net developable area of circa 3.9 ha made up in</p>

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			<p>the concept plan of 5 key housing parcels suitable for approximately 115 units overall.</p> <p>The site would have a suburban rural feel in terms of landscape and provide a sustainable location within Weston-Super-Mare to deliver a mixed and balanced community.</p> <p>The development of this site would create a high quality housing environment and preserve the surrounding countryside and Green Belt. It will maximise development at Locking alongside the M5 whilst improving the green tree belt alongside the motorway embankment.</p> <p>Preliminary studies have not identified any significant constraints, and further detail studies can ensure that a high quality sustainable development is delivered. According to the Council's report to the draft representations, it is acknowledged that the site is included within the 'green buffer' as shown in the Weston Villages Supplementary Planning Document and has the need for a dark corridor to cross the site in order to assist bat foraging. Therefore, detailed investigations would be required to establish that these constraints could be overcome and the site is suitable for development. However, we believe that all these issues are capable of design mitigation and therefore, this site should be included in the settlement boundary.</p>
Taylor Wimpey		14828865//2	<p>These representations are made on behalf of Taylor Wimpey who have interests in a site at Stowey Road, Yatton. The Council will be aware of this site given that an application (ref.15/P/1918/O) was made on the site in 2015 and refused in August 2016. The purpose of these representations is to highlight to the Council that the site at Stowey Lane is suitable for residential development, capable of achieving development within five years and therefore assisting the Council with their housing land supply and in a sustainable location at a Service Village where development of an appropriate scale can be allocated through the Allocations DPD.</p>

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			<p>The site is located adjoining the settlement boundary of Yatton which, as a Service Village, is capable of accommodating development of a size and character appropriate to the settlement. An outline planning application (ref. 15/P/1918/O) was submitted on the site in August 2015 and was refused in August 2016. Significant technical work has been progressed to support the planning application and during the determination of the planning application, the site is therefore capable of being progressed quickly.</p> <p>The site is outside of the defined settlements boundary for Yatton but also outside of the Green Belt and not subject to environmental designations or within a strategic gap. A small area of the site is within a flood zone, however, the Flood Risk Management Team raised no objection to the proposed development on the site indicating that this constraint could be addressed through carefully planned layout. The site is, therefore, suitable and available for development and is an appropriate site for identification for development in the Site Allocations Plan.</p> <p>Additional detail on the suitability of the site is set out below.</p> <p>Sites and Policies Plan Part 2: Site Allocations Plan</p> <p>The Sites and Policies Plan Part 2: Site Allocations Plan to which these representations relate, does not allocate Taylor Wimpey's land for any specific use, nor does it apply any designation to the site. We consider that insufficient evidence and justification has been provided to exclude this site from the Allocations DPD. As detailed in the sections below, the assessment of the site fails to consider how the technical constraints it raises can be overcome, as has been demonstrated during the determination of the planning application on the site.</p> <p>Our client's site is appropriate for residential development and should be allocated as such to ensure North Somerset meets its housing</p>

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			<p>requirement. Draft Policy SA1 sets out that residential sites of 10 or more units are shown on the Policies Map and draft Policy SA2 states that residential development within the settlement boundaries defined on the proposals map will be acceptable in principle. We request that the site at Stowey Lane, Yatton be included in Schedule 1 as an allocation for residential development and that the settlement boundary of Yatton be amended to include the site.</p> <p>The purpose of the Site Allocations Plan is to identify detailed allocations required to deliver the Core Strategy policies, including the requirement to deliver 20,985 dwellings between 2006 and 2026. However, the plan provides an opportunity to boost significantly the supply of housing. Given that the Council are currently unable to demonstrate a five year housing land supply and that additional housing needs to be identified within the Authority area in order to meet the housing needs identified in the published West of England Strategic Housing Market Assessment, there is a clear need to identify additional sites for residential development in the area.</p> <p>A ministerial letter to the Planning Inspectorate (19th December 2014) makes it clear that SHMAs are just the first stage in developing a Local Plan and they are not a proxy figure for a final housing requirement. However, the government expects that Councils will have regard to SHMA findings. The ministerial letter states that “<i>the publication of a locally agreed assessment provides important new evidence and where appropriate will prompt councils to consider revising their housing requirements in their Local Plans. We would expect councils to actively consider this new evidence over time and, where over a reasonable period they do not, Inspectors could justifiably question the approach to housing land supply</i>”.</p> <p>Although the Core Strategy Inspector required an early review of the Core Strategy, the Site Allocations Plan provides an opportunity to</p>

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			<p>explore opportunities to deliver housing growth above the minimum requirement, taking account of the West of England SHMA findings, as suggested above. This would be an appropriate and plan-led response to responding to the findings of the SHMA.</p> <p>Housing Requirement and Supply</p> <p>Following the re-examination of the Core Strategy housing policies, the housing requirement is now a minimum of 20,985 dwellings. As set out in the draft Allocations Plan, 7,995 dwellings have already been completed over the plan period from 2006 to 2015. This leaves a residual requirement of 12,990 to be identified to 2026. Furthermore, given that this figure is expressly stated to be a minimum requirement, it would be prudent for the Council to treat this figure as a minimum and ensure that potential delays and non-implementation of sites does not result in the continuation of a lack of five year supply or indeed, under delivery across the plan period. Consequently, in line with the NPPF's requirement to boost significantly the supply of housing and to ensure a five-year supply is achieved and maintained, the Council should be allocating a greater amount than the minimum required in the Site Allocations Plan.</p> <p>At Table 1 of the draft Allocations Plan the Council states that there will be a supply figure of 21,051 dwellings over the plan period. However, this is just 66 above the minimum requirement and, does not allow sufficient flexibility to ensure a robust supply of housing is maintained.</p> <p>Land at Stowey Lane, Yatton</p> <p>The site was considered under ref. HE14186 as a site that was put forward by a developer/landowner and assessed for residential potential at the March 2016 Consultation Draft of the Allocations Plan. Within the summary of representations to this draft version of the plan, the response made to representations relating to</p>

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			<p>Land at Stowey Road (3.9ha) was summarised as follows ‘Part of the greenfield site has been assessed previously as part of the potential residential sites assessments (Site HE14186). It was considered that development of this site would be an intrusion into countryside, has the potential to increase congestion in High Street, be some distance to rail station and is in close proximity to a wildlife site. Sufficient land has been identified in the SAP to meet the Core Strategy’.</p> <p>In the Residential Site Assessments table the site is assessed and the conclusion states that the site is not proposed to be allocated in the Site Allocations Plan for the following reason</p> <p><i>‘Green field with flood risk and intrusion into countryside. Potential to increase congestion in High St. Proximity to wildlife site’.</i></p> <p>To deal with these matters in turn; it is accepted that the site is greenfield and, by its location outside of the defined settlement boundary, is part of the open countryside. This is the case for several sites around Yatton, including those that have been allocated for development at the western end of the village. North Somerset will not be able to meet its housing needs without allocating greenfield sites and it is not considered that this is sufficient reason to discount this site as a potential residential allocation.</p> <p>With regard to flood risk only part of the northern area of the site is at risk of flooding and of this the majority benefits from flood defences. Furthermore, all but one of the sites around Yatton that are proposed to be allocated for development are also partly affected by flood risk and also score red in this category in the site assessment table. Flood risk on the Stowey Lane site was considered by consultees during the determination of the planning application on the site and the Council Flood Risk Management Team had no objection to the proposed development, and nor did the Environment Agency. We therefore consider that flood risk is a</p>

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			<p>constraint to development that can easily be overcome and an acceptable solution has already been presented that the relevant consultees found suitable.</p> <p>In terms of the site having potential to increase congestion in the high street, of note are the following comments from the case officer considering the application on the site taken from the officer report;</p> <p><i>‘The number of additional vehicles using High Street would be very small indeed, and far less than the volumes likely to be generated by the developments at North End. Also those motorists would have the option of routing to High Street via Well Lane, Cherry Grove or Barberry Farm Road and may not use the busiest section of the High Street near the Coop. It is considered that whilst acknowledging the consents / developments minded to approve at North End, this modest number of vehicles could not be considered likely to have a severe impact under the terms of NPPF’.</i></p> <p>Clearly the case officer was of the view that the development on the site would not cause an unacceptable impact on traffic along the high street. We do not consider that this should be cited by the council as a reason why the site is not suitable to be allocated for development given that when considered as part of a planning application the impact on traffic along the high street was not found to be an issue.</p> <p>Finally, in terms of ‘proximity to wildlife site’, no detail is given within the site assessment for what area this constraint relates to. If it refers to the Site of Nature Conservation Importance which adjoins the eastern boundary of the site this was considered as part of the planning application and no reason for refusing the development on grounds of ecological impact was raised. The officer report for the application notes the site’s proximity to the Site of Nature Conservation Importance and location within a habitat area for bats and concludes that the</p>

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			<p>development impact is manageable through planning conditions and appropriate mitigation.</p> <p>Again, we do not support the Council's assessment that proximity to this wildlife site is sufficient reason to discount the site as a suitable location to be allocated for residential development. The draft Allocations Plan does propose some sites for residential development at Yatton, however these are all located at the opposite end of the settlement to Taylor Wimpey's site. The site at Stowey Lane is equally suitable for residential development and will not exasperate the cumulative impact of the concentration of development sites at the western end of the town.</p> <p>The identification of sufficient sites that are suitable, available and deliverable is vital to ensuring that the housing needs of the District are met. The site at Stowey Lane has the potential to deliver up to 60 dwellings which is an appropriate scale to be accommodated at a Service Village such as Yatton. The development would make efficient use of an available site and deliver high quality new homes, including affordable homes. The technical work already progressed to support the application on the site means that the site can progress quickly and deliver housing within the five year period. The allocation of this site within the Allocations DPD for residential development would demonstrate that the Council are proactively seeking to address the shortfall in housing supply.</p>
Halsall Homes		14869345//1	<p>These representations are written by Origin3 on behalf of Halsall Homes (herein referred to as "Halsall") in respect of their land interest at Churchill Park Farm, Langford (site known as 'Ladymead Lane HE1429) which was considered as part of the 'call for sites' exercise and the subsequent sustainability appraisal (SA) work that fed into the preparation of this pre-submission Site Allocations Plan Consultation Draft plan (October 2016).</p>

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			<p>These representations are made further to previous representations submitted by Origin3 on behalf of Halsall during April 2016, which relate to an earlier version of the Site Allocations Plan.</p> <p>‘Ladymead Lane’ is assessed in the Housing and Economic Land Availability Assessment (HELAA) 2014 under the reference HE1429. It is measured as 2.39ha in area and as having capacity of 72 dwellings. We believe the outermost extent of HE1429 represents the limit of land to be considered for potential development at this point in time. However, as set out in our previous set of representations in April 2016, a smaller site area (1.1ha) with the capacity for up to circa 40 dwellings should be assessed in the Council’s sustainability appraisal work, a site location plan is provided in this regard at Appendix 1.</p> <p>Halsall maintains that Churchill and Langford are the least constrained service villages in North Somerset and, as such, should be accommodating a higher proportion of housing growth to help the Council reach its’ housing requirement set out in the OAHN. At the time of our previous representations, Churchill was considered the eighth most sustainable service village out of nine1. It was awarded amber designations across seven of the eight ‘characteristics’. The other characteristic ‘environmental sensitivity’ was awarded a red designation which was justified in the report on the basis that the settlement has no community environmental initiatives, had a high probability of Best and Most Versatile (BMV) agricultural land, flood risk zones and an AONB designation.</p> <p>The Council’s latest SA work (October 2016) informing the SAP positively amends the assessment of Churchill/ Langford, most notably changing ‘environmental sensitivity’ from a red designation to an amber designation. The SA evidence also identifies that Churchill is ‘well served’ referring to connectivity, moving from an amber designation to a green designation. As such, Churchill/ Langford has moved from being</p>

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			<p>considered the eighth most sustainable service village under Policy CS32 to the seventh. It is also noted that when reviewing the Executive Summary Report (October 2016) Churchill/ Langford scores higher when assessed against the appraisal methodologies than Easton-in-Gordano/ Pill, thereby suggesting Churchill/ Langford should in fact be considered the sixth most sustainable service village.</p> <p>Referring to the Council's revised SA work, the service villages sustainability hierarchy now reads as follows:</p> <ol style="list-style-type: none"> 1. Backwell (65 dwellings all allocated) 2. Banwell (0 dwellings allocated) 3. Yatton (696 dwellings) 4. Winscombe (199 dwellings allocated) 5. Congresbury (68 dwellings allocated) 6. Easton-in-Gordano/ Pill (0 dwellings allocated) 7. Churchill (219 dwellings allocated) 8. Uphill (Not a service Village) 9. Wrington (0 dwellings allocated) 10. Banwell (0 dwellings allocated) <p>All of service villages, bar Churchill, Banwell, and Winscombe, sit adjacent to Green Belt land which heavily restricts development opportunities. NPPF Paragraph 14 makes clear that, for plan-making, the presumption in favour of sustainable development means that local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless specific policies in the Framework indicate development should be restricted. These policies extend to Green Belt and Areas of Natural Outstanding Beauty (AONB) or areas at risk of flooding. In this context, Churchill/</p>

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			<p>Langford is one of the least constrained service villages in North Somerset in policy terms.</p> <p>In order meet the OAHN and plan positively, the SAP should be allocating sites to meet the housing requirement in order to reduce the reliance on windfall sites. The latest housing monitoring figures³ show that, taking into account completions, planning consents, and proposed allocations, there is a residual figure of 119 to be accounted for by windfall applications over the Core Strategy plan period within service villages. The recent modification <i>MM05-Policy CS32: Service Villages</i> to the Core Strategy, set out in the Inspector's report⁴ (November 2016), recommends the adoption of Policy CS32, which allows for unallocated sites of up to 25 dwellings to come forward adjoining the settlement boundary of service villages. However, the Council's inability to demonstrate a five-year housing land supply, confirmed at the recent appeal decision⁵ (12th December 2016), leaves the service villages susceptible to opportunistic applications of more than 25 dwellings. A more appropriate strategy would be to allocate additional sites at the least constrained service villages in order to meet the OAHN, further strengthening the Council's ability to demonstrate a five-year supply of deliverable housing sites. This ensures a truly plan-led system. It is noted that the Council has stated that further development at Churchill beyond that with planning consent or proposed in the Site Allocation Plan will be resisted. This approach does not accord with the permissive approach set out by Policy CS32 and cannot be pursued whilst there is a windfall housing figure for the service villages and the Council cannot demonstrate a five-year housing land supply.</p> <p>It should also be noted that the West of England Joint Spatial Plan covering the four authority areas; North Somerset, Bristol, South Gloucestershire and B&NES is currently being prepared to provide a strategic framework for the delivery of an anticipated 39,000 over and above the OAHN's of the four authorities. Of this, up to</p>

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			<p>5,400 dwellings are proposed to be delivered at the 'M5 to A38 Transport Corridor' covering the villages of Churchill and Banwell.</p> <p>Halsall maintains that within Churchill itself, the three sites proposed to be allocated within the SAP; Pudding Pie Lane (East) (141 dwellings), Says Lane (43 dwellings) and Pudding Pie Lane (West) (35 dwellings), appear to be a reaction to the submissions of formal planning applications. The SA process should not be pre-determined, however a lack of valid justification and distinction between the sites for the inclusion/omission of sites suggests this is the case. Furthermore, there remains inconsistencies in the way the objective SA methodologies have been applied to specific sites and how they then translate into conclusions.</p> <p>The Residential Sites Assessments SA document, currently being consulted on, assesses individual sites within Churchill/Langford against the Council's assessment criteria. Of the 22 different sustainability objectives, Ladymead Lane was scored the same as the three proposed allocations under seventeen of the sustainability objectives.</p> <p>As is evident, the site at Ladymead Lane (HE1429) performs equally or better than the three sites proposed to be allocated when measured against the Council's appraisal methodology. The Council's justification to omit the site at Ladymead Lane on the basis of it being a Greenfield site and BMV land, creating an intrusion into the countryside, is not sufficiently justified.</p> <p>The Council's 'Summary of comments made on the March 2016 Consultation Draft SAP' reiterates Ladymead Lane was not selected for the above stated reasons. However as shown in Table 1 the Council's SA work concludes that the proposed allocations at Pudding Pie Lane (HE1491) and land between Jubilee Lane and Pudding Pie Lane (HE14269) are also likely to be BMV land, whilst land at Says Lane (NS0029) is</p>

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			<p>also considered to have poor pedestrian/cycle links with the need to cross the A38.</p> <p>The lack of differentiation between Ladymead Lane and the proposed allocations does not translate into the conclusions where the following is stated:</p> <ul style="list-style-type: none"> - Proposed Allocations: ‘Close to facilities and no significant adverse impact on landscape’ - Ladymead Lane: ‘Greenfield and BMV and intrusion into countryside. Ladymead Lane a constraint. <p>In the context of NPPF Paragraph 182, the draft Site Allocations Plan falls short of being:</p> <ul style="list-style-type: none"> - Justified – it is not the most appropriate strategy when considered against the reasonable alternatives, and is not based on a proportionate evidence base - Consistent with national policy, enabling sustainable development in accordance with the policies in the NPPF <p>An additional response from the Council to representations received in March 2016 considers that the development of Ladymead Lane (eastern extent frontage site of HE1429) would adversely affect the rural setting of the village. This, coupled with the Council’s SA conclusion that development here would create an intrusion into the countryside, is a weak assertion on the basis the same consideration is not applied to the two proposed allocations north of Pudding Pie Lane (HE14269 and HE1491) which serve to sever the existing containment of the settlement formed by Pudding Pie Lane itself. In fact, the site at Ladymead Lane (shown in Appendix 1) would continue the existing development linear to Ladymead Lane without protruding beyond the established backline of existing property boundaries. It would therefore be less likely to adversely affect the rural setting than the proposed allocations on Pudding Pie Lane. It was also commented that there is poor access to the site via Ladymead Lane. From review of the Council’s evidence base, there is no technical highways input establishing this position and the same questions should be raised with regards to</p>

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			<p>the accessibility of Pudding Pie Lane which will be required to support a significantly larger scale of development (194 dwellings).</p> <p>We respectfully request that the site at Ladymead Lane is included as a residential allocation within the SAP, we would be happy to provide the Council with technical evidence to support this position, if requested. I trust the above comments will be considered prior to the SAP being submitted to the Secretary of State for Examination.</p>
Newland Homes		14889313//1	<p>Two recent appeal decisions have shown that the LPA is unable to demonstrate a 5 year housing land supply. In order to address this issue the LPA needs to allocate additional housing sites in the emerging Site Allocations Plan.</p> <p>Banwell is designated as a Service Village in the Core Strategy, meaning that it is a sustainable location that is suitable for accommodating some of this additional development. The view that Banwell is a sustainable location to accommodate additional housing growth is supported by the fact that it falls within a strategic location for growth in the emerging West of England Joint Spatial Plan (JSP).</p> <p>The site itself is in a sustainable location on the western edge of Banwell, within walking distance of both the Co-op and the village centre. It is also well served by public transport, with the two nearby bus providing access to both Weston super- Mare and Wells.</p> <p>In terms of suitability the site is bound by residential development on three sides and represents a logical extension to the existing village. There are no obvious constraints that would preclude development on the site, and as set out above the initial transport work that has been undertaken confirms that there is sufficient capacity for a development of 80 dwellings to be served by the vehicular access from William Daw Close. Furthermore, a detailed Landscape &</p>

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			<p>Visual Statement has been prepared which concludes that:</p> <ul style="list-style-type: none"> • The issues raised in respect of the land to the west do not apply to the Land South of William Daw Close, • The development of the Land South of William Daw Close would provide a practical and contained extension to the existing settlement. <p>On the basis of the above we strongly encourage the LPA to allocate the Land South of William Daw Close for residential development in the Site Allocations Plan. The site constitutes a suitable and available sustainable housing development site, which will help the LPA to address the significant shortfall in its housing supply</p>
jeremy@astonand.co.uk		15574465//1	<p>Housing</p> <p>The Core Strategy target 20,985 for the period 2006-2026 and the balance of housing currently proposed biases the largest centre Weston Super Mare and the small surplus across the entire district is only 166 units or less than 0.8% of the total proposed supply. That is not a substantial number and provides limited flexibility if housing need has been underestimated, let alone if land is 'banked' and not brought forward for creating much needed new homes. The Inspectors recommendation on the draft Core Strategy (Policy CS14) recommended '<i>being more positive about sustainable development at each of the settlements, with less restrictive and more positive wording. It will also involve accepting a certain amount of development of an appropriate scale outside, but adjoining, the settlement boundaries</i>'. Such words are welcome and NSDC should go further in identifying suitable land now to ensure a future plan led system.</p> <p>Whilst the proposed distribution of housing focused on the larger settlement of Weston is</p>

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			<p>logical it does not adequately address the issue of sufficient supply and therefore affordability of housing in the secondary centres including Portishead. Local young people have progressively been driven out of Portishead to Clevedon and unless adequate supply is addressed in Portishead that situation will worsen pushing younger people to Weston farther from their family roots.</p> <p>With the moving forward of the Metro West rail link which older local people had promoted essential prior to the redevelopment of Portishead Marina, access to Bristol and commuting capacity will improve but that needs to be balanced with additional local housing for the young ‘<i>generation rent</i>’ and elderly.</p> <p>There are constraints including greenbelt and flooding affecting much of Portishead but land just outside the settlement of North Weston being put forward for allocation under the concurrent Joint Strategic Plan consultation is outside of the flood zone and could supply capacity for up to 306 additional dwellings.</p> <p>Recommendation</p> <p>Increase the total planned supply by 5% to provide additional flexibility and through careful review and assessment identify additional capacity at Portishead and Clevedon adjacent to the existing settlements where adjustment of the Green Belt would not adversely impact its primary function. There is land outside of the flood zone capable of being brought forward.</p>
ben.lewis@renplan.co.uk	Renplan	15864513//1	<p>Mr Lawley’s land as outlined on the enclosed plan ref. CF01 001 is formally offered as part of a residential allocation at Yatton</p> <p>Please accept this letter as a further representation prepared on behalf of Mr S Lawley of Chestnut Farm North End Road, Yatton, BS49 4AS, to North Somerset’s Draft Sites and Policies Plan Part 2: Site Allocations Plan which is now at the</p>

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			<p>final consultation stage before it is submitted for examination by the Secretary of State.</p> <p>Enclosed with this letter, is a copy of our earlier representation dated 27/04/2016 as well as a site location plan and indicative block layout plan.</p> <p>Since our earlier submission, North Somerset Council have advised (ref. Appendix 4 (bottom of page 166) of their 18th October 2016 Executive Meeting Report) the following in relation to our site:</p> <p>'Additional greenfield development over and above that proposed at Yatton through the Site Allocations Plan will only increase pressure on the surrounding road network and will be resisted until further improvements to road and pedestrian safety are undertaken.' (http://apps.n-somerset.gov.uk/cairo/docs/doc27652.pdf)</p> <p>Mr Lawley's site is an infill site totally surrounded by existing residential and proposed allocations.</p> <p>North Somerset Council have elaborated in a subsequent telephone call that they have no concerns regarding the landscape impacts of developing Mr Lawley's land and their concerns stem purely from the fact that they consider sufficient allocation has been put forward already as part of the Draft Plan whereby further allocations would place an increased pressure on the surrounding road network.</p> <p>Mr Lawley's case in support of his land being allocated is that his site should not have been left out of the proposed draft allocations (ref. Figures 1 and 2 below) because it is sequentially preferable from a landscape perspective than some of the land that has been included.</p> <p>Should the Inspector find that the plan fails to provide sufficient allocations, we respectfully invite the consideration of this site to be included for a residential development.</p>

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			<p>However, if the Inspector is minded to agree with North Somerset that sufficient allocations have been provided for Yatton, then the Inspector is respectfully invited to consider whether North Somerset Council have allocated correctly having regard for landscape impacts. There is a strong case that much of the periphery land that has been allocated should be re-assessed in relation to its suitability in comparison to Mr Lawley's land.</p> <p>There are parts of the allocations as denoted in the screenshot attached that Mr Lawley believes are less preferable to his land. Consideration of figure 3 helps understand this position. A correction to re-align and subsequently incorporate Mr Lawley's land would provide for a less intrusive (to the landscape) residential extension to Yatton.</p> <p>Figure 3 is a useful reference when considering the plans on the page before and shows how intrusive much of the draft proposed allocation is in comparison with Mr Lawley's land (see attachment).</p> <p>Mr Lawley would like to press the case in support of his site as outlined on the attached site location plan to be incorporated within the residential allocations for Yatton. This letter should be read in conjunction with the previously submitted representation dated 27/04/16; copy attached, as well as the attached Site Location and Block Plans.</p>
Sir Robert McAlpine Enterprises Ltd	-	16111841//1	<p>We provide these representations on the behalf Sir Robert McAlpine Enterprises Ltd in relation to land interests at Scot Elm Drive, Weston-super-Mare.</p> <p>Sir Robert McAlpine Enterprises Ltd owns two land parcels to the north and south of Scot Elm Drive, at the roundabout junction, as identified on the following plan. (see attachment)</p> <p>The sites, together with adjacent land parcels, were allocated as employment land in the North</p>

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			<p>Somerset Replacement Local Plan (adopted 2007) for the Locking Castle Business part of the Junction 21 Enterprise Area. However, despite the long standing employment allocation, the take up of employment land has been poor in this location and only a few sites have been developed for employment purposes. In 2015, outline planning permission was granted at appeal for in the region of 72 dwellings on a site to the south of Scot Elm Drive, adjacent to our client's southern site for Summerfield Development Ltd.</p> <p>The Site Allocation Plan proposes allocating the Summerfield Development site for housing together with the adjacent Westacres Caravan site. These are shown on the following map, which illustrates their proximity to my client's sites. Together, they have capacity for circa 200 new dwellings. These will augment the several hundred homes recently constructed in the West Wick neighbourhood, including Barker Close which runs up to the western boundary of my client's southern site. Further residential sites are proposed to be allocated at Land to the north of the A370, Summer Lane and Bridge Farm which further consolidates development in the West Wick neighbourhood.</p> <p>However, my client's sites are not allocated for any particular land use in the Site Allocations Plan and affectively appear as 'white land' on the proposals map.</p> <p>Westacres is immediately adjoining my client's southern site and is included in the Residential Site Assessment where it scores well against the locational criteria, for example proximity to facilities and availability of sustainable transport modes including pedestrian/cycle links, bus stops and railway station. Therefore the sites are situated in a sustainable location.</p> <p>With regards to the Summerfield Development site, we note that the Inspector accepted the sustainability credentials in the appeal decision concerning Scot Elm Drive:</p>

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			<p><i>"the Council's evidence indicates that the site is a sustainable and suitable location for housing. Given its proximity to local services, including shops and schools, and employment opportunities along with its accessibility, including via public transport, I agree" (APP/D0121/A/14/2223975, paragraph 55).</i></p> <p>It is reasonable to assume that my client's sites would fare equally as well in the Residential Site Assessment should they have been included. They are situated in a sustainable location with good access to local amenities. There is also a wide range of shops, services and facilities to the north of the A370 including three supermarkets, restaurants/pubs and a secondary school. They are well served by public transport links including bus routes to the town centre, and within a mile of Worle railway station. Their proximity to Junction 21 of the M5 also aids connectivity to the wider surrounding area.</p> <p>The southern site is currently subject to an outline planning application for up to 10 dwellings (reference 15/P/2234/O). The application is currently pending but the Case Officer has indicated that she will be recommending the application for approval subject to resolving a few minor matters. Therefore, the principle of developing the site for residential purposes would appear to be acceptable to the Council.</p> <p>The north site also has the capacity to deliver up to 10 dwellings which would compliment the development site to the south of Scot Elm Drive. As a corner plot it could easily accommodate a landmark building such as a small block of flats.</p> <p>The sites contain a number of environmental features but these do not pose a constraint to their development. They have a comparable level of flood risk to the approved Scot Elm Drive site, as all are in Flood Zone 3a. My client's southern site and the approved Summerfield Development site have been subject to Sequential and Exception Tests which show that there are no preferable sites within the settlement limit of Weston-super-</p>

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			<p>Mare. The Summerfield Development site is subject to resolution through a Drainage Strategy, which the Environment Agency has supported, and a Flood Risk Assessment and robust Drainage Strategy has been provided for my client's southern site.</p> <p>In view of the prospect of a planning consent for residential development of the site and its compatibility with neighbouring residential allocations, and ability to provide an extension to the existing residential frontage currently terminating at Barker Close, we kindly request that my client's sites are allocated for housing in the Site Allocations Plan. This will support the Core Strategy in focussing housing growth 2006-2026 in sustainable locations within Weston-super-Mare, towards meeting its overall requirement for 20,985 new homes. Both sites have capacity for 10 or more dwellings which is the minimum threshold for allocation under Policy SA1.</p>
McCarthy & Stone Retirement Lifestyles Ltd	McCarthy & Stone Retirement Lifestyles Ltd	2884417//1	<p>McCARTHY & STONE RETIREMENT LIFESTYLES LTD.</p> <p>As the market leader in the provision of sheltered housing for sale to the elderly, McCarthy and Stone Retirement Lifestyles Ltd considers that with its extensive experience in providing development of this nature it is well placed to provide informed comments on the North Somerset Site Allocations Plan, insofar as it affects or relates to housing for the elderly.</p> <p>We have previously provided commentary on the emerging North Somerset Local Development Framework, specifically the Draft Sites and Policies consultation in April 2013. In our representation we outlined how, in line with the rest of the country, the demographic profile of North Somerset is projected to age, with the largest proportional increases in the older population expected to be of the 'frail' elderly, those aged 75 and over, who are more likely to require specialist care and accommodation. The</p>

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			<p>provision and of adequate support and accommodation is therefore <u>a significant challenge</u> and, unless properly planned for, there is likely to be a significant shortfall in specialist accommodation for the older population, which will have a knock on effect in meeting the housing needs of the whole area and wider policy objectives. Specialist accommodation for the elderly, such as that provided by McCarthy & Stone will therefore have a vital role in meeting the areas housing needs.</p> <p>We note that there are <u>no allocations for the delivery of older persons' accommodation</u> in the Site Allocations Plan, nor is there consideration of the suitability of sites detailed for such developments.</p> <p>We respectfully remind the Council that the National Planning Policy Framework stipulates that the planning system should be '<i>supporting strong, vibrant and healthy communities</i>' and highlights the need to '<i>deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed communities. Local Planning Authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community... such as... older people</i>' (emphasis added).</p> <p>The National Planning Practice Guidance reaffirms this in the guidance for assessing housing need in the plan making process entitled "How should the needs for all types of housing be addressed?" (Paragraph: 021 Reference ID: 2a-021-20140306) and a separate subsection is provided for "Housing for older people". This stipulates that "<i>the need to provide housing for older people is <u>critical</u> given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013). Plan makers will need to consider the size, location and quality of dwellings needed in the</i></p>

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			<p><i>future for older people in order to allow them to move. This could free up houses that are under-occupied. The age profile of the population can be drawn from Census data. Projections of population and households by age group should also be used. The future need for older persons housing <u>broken down by tenure and type</u> (e.g. Sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (use class C2). But identifying the need for particular types of general housing, such as bungalows, is equally important” (My emphasis).</i></p> <p>When selecting sites for elderly persons’ accommodation careful consideration is given to locational criteria including: Topography, Environment (including safety and security), Mobility, Services and Community Facilities. Suitable sites for specialist accommodation for the elderly are subsequently difficult to find.</p> <p><u>173 -175 Kenn Road</u></p> <p>The aforementioned site is currently allocated in Schedule 3 as a Safeguarded Employment Site and must therefore be retained for proposals falling within Use Class ‘B’ under the terms of <i>Policy SA 5</i>.</p> <p>The site is located within the urban area of south Clevedon and is immediately adjacent to the Tesco Superstore. It is immediately bounded by the residential gardens of St Michael’s Avenue to the north and Closemead and Cherry Hay to the west.</p> <p>We would note that the site is not referenced in the <i>Employment Allocation Review: Background Paper</i> and has been deemed an employment site of strategic importance by virtue of its historic use rather than the quality of the facilities on offer or its location.</p>

Name	Organisation	Comment ID	Comment Received
			<p>We also note the large 8.2 hectare employment land allocation nearby at land west of Kenn Road and would question whether the loss of 173-175 Kenn Road would result in significant out-commuting given the forthcoming availability of purpose-built employment premises in the area.</p> <p>The benefits of safeguarding sites cited in paragraph 4.33 such as reducing out-commuting and increasing local employment opportunities are acknowledged but it is considered that land uses falling outside the 'B' use classes also fulfill these objectives.</p> <p>McCarthy & Stone is considering that 173-175 Kenn Road as a potential location for an Assisted Living (Extra Care) development. This is accommodation aimed at enabling independent living for the "frail elderly", persons typically aged 80 and over.</p> <p>The McCarthy and Stone Extra Care concept provides day to day care in the form of assistance and domiciliary care tailored to owners' individual needs, enabling the frail elderly to buy in care packages to suit their needs as they change. It provides further choice for the frail elderly allowing them to stay in their own home and maintain a better sense of independence, enhancing their personal welfare over time rather than through the fixed costs of a nursing or residential care with its one for all approach. Accordingly, Extra Care accommodation possesses a number of 'enhanced facilities' in terms of the communal facilities available and provides a higher level of care, and subsequently staffing, when compared to private retirement housing. <u>Indeed a typical, Assisted Living development there is a mix of full and part time positions which broadly equates to between 14-17 full time equivalent posts.</u></p> <p>We therefore respectfully request that the Council reconsiders its position with regards to the designation of 173-175 Kenn Road, Clevedon as a Strategic Employment Site given the potential of the site to deliver much needed Assisted</p>

Name	Organisation	Comment ID	Comment Received
			<p>Living (Extra Care) accommodation in the Authority. This is exacerbated by the omission of sites for this form of development in the Site Allocations DPD. Indeed, with the absence of specific site allocations for older persons' accommodation the site would also be suitable for a sheltered housing / Retirement Living development, in whole or in part, due to its site characteristics and this should not be ruled out.</p>
Yatton Parish Council	Yatton Parish Council	3106433//3	<p>We recommend that the old Titan Ladders site, Mendip Rd Yatton be considered as a potential housing site to compensate for the loss of the 21 house allocation at Yatton Station. The Titan Ladders site is situated close to local facilities and is a brown field site where affordable housing could be provided. This site is currently not in the Site Allocations Plan.</p>
St Modwen Properties PLC	-	3568545//1	<p>In summary we are wholly unconvinced that our previous submissions have been robustly assessed and considered. We have reviewed the Council's latest evidence which supports the publication version of the document (including the Employment Allocations Review November 2016 and the Council's response to comments as summarised within Appendix 4 to the 18 October 2016 Executive Committee) and in our opinion the documents do not provide a sound, fully tested and considered evidence base to justify the approach of the Plan.</p> <p>(ii) Land west of Locking Parklands: The evidence base does not justify the lack of extension of the settlement boundary to allow further development in this part of the Weston Villages Regeneration Area.</p> <p>In line with our previous comments our response focuses specifically on emerging policies relating to Housing Allocations (SA1), Settlement Boundaries (SA2), Employment Allocations</p>

Name	Organisation	Comment ID	Comment Received
			<p>(SA4), and Strategic Gaps (SA9). We hereby provide the comments below in the order they are set out in the document. We also reiterate significant concerns with regards to the accuracy of the interactive proposals map notably the incorrect or confusing designations within Locking Parklands.</p> <p>Since our comments in April 2016 we would note that St Modwen submitted an application on the 'Moss land' in July 2016 (reference 16/P/1881/OT2) for upto 300 dwellings within the currently defined settlement boundary. This followed masterplanning and development capacity analysis of the site. In reality it is expected that detailed layouts to inform reserved matters submissions will demonstrate that the site can only accommodate a number below 300 dwellings.</p> <p>We have previously stated that it is our understanding that the Weston Villages SPD and the infrastructure discussions regarding the Section 106 agreements for Locking Parklands, Weston Airfield and Mead Realisations have assumed the delivery of 350 dwellings on the former Moss land. This further underlines our previously stated position within the April 2016 representations that further land should be looked at including the former Moss land in order to deliver the required housing numbers within the Weston Villages.</p> <p>We note the Council has subsequently accepted that an extension of the Weston Villages is required, albeit for a limited capacity of 250 dwellings in the allocation proposed to the east of Parklands Village adjoining the M5. We have reviewed the Council's justification for making this allocation and we wish to raise the following concerns:</p> <p>(i) We are not convinced that the scale of allocation meets the full housing requirements for the Weston Villages to deliver the Core Strategy requirement, especially noting that the Core Strategy requirement is a minimum housing</p>

Name	Organisation	Comment ID	Comment Received
			<p>target and will be subject to immediate review given the JSP work.</p> <p>(ii) Fundamentally the allocation of this site does not appear to have been based upon a robust analysis of alternative site options (such as land west of Locking Parklands beyond the current application). The Council does not appear to have even considered a potential number of dwellings for the St Modwen land in their Residential Site Assessment exercise as the capacity column has not been completed for this site.</p> <p>(iii) The new allocation appears to have been justified in the report to Executive Committee (18th October 2016 – Appendix 4) and Residential Site Assessment exercise on the basis of the submission of a planning application which has allowed further consideration to concerns regarding noise and landscape. This is not a sound approach to allocation of the land as the submission of an application does not justify in any terms favouring one site over the other alternatives. If this was the case then the St Modwen land at Clevedon should be immediately allocated for residential led development as explained further below.</p> <p>The Council has no considered evidence to demonstrate whether or not the constraints they have identified on the alternative sites at Locking could also be overcome through the submission of a planning application. We would note for example the St Modwen land has been dismissed (Council’s response 18th October Executive Committee Appendix 4) as <i>"This site lies within the ‘green buffer’ as identified in the Weston Villages SPD and also within the strategic gap proposed in this plan. There is therefore a landscape impact and inappropriate for site to be allocated"</i>. The Council’s Site Assessment paper also dismisses the site on the grounds of <i>"Landscape impact being located in the ‘green buffer’ as identified in the Weston Villages SPD"</i>. These findings do not justify the non allocation of the</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>site and the allocation of the land east of Parklands village as both sites fall in the same green buffer in the SPD. The Council's illogical approach is further underlined by the reference to the land south east of Locking Parklands not being allocated but noting (Executive Committee Appendix 4 p148 report) a number of constraints that would need to considered through an application (noting also the scope for sites of 75 dwellings or less being acceptable beyond Weston's settlement boundary). No reference to this approach is noted within the response to the St Modwen land.</p> <p>(v) Furthermore we have found no detailed analysis of the landscape impact that might arise from the St Modwen land being developed, most significantly the land in question falls below the land already allocated and therefore if the higher land is acceptable then why would the lower land give rise to landscape concern. Therefore should an application be submitted we are confident that any concerns regarding landscape impact would be overcome. We consider the strategic gap points below in response to SA9</p> <p>Residential Site Assessment on flood risk. This requires further consideration on the basis of the strategic flood risk solution for Weston and the fact that significant parts of the Weston Villages also fall within the area of risk. St Modwen is of the view that further consideration to this issue through the planning application process would demonstrate that the land can be suitably mitigated and therefore the site should not be dismissed on this basis. Therefore with these two landscape and flood 'constraints' removed the site performs as well (if not better as there are no noise constraints) as the new allocation.</p> <p>(vii) There is no sound justification of the extent of the strategic gap, it is based on arbitrary field boundaries rather than a sound assessment of purpose, or landscape, and visual impact or assessment of coalescence. We won't reiterate our comments here from April 2016 in detail but the extent of the strategic gap precludes the</p>

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			<p>growth requirements to meet the Core Strategy and the imminent review with further growth that will be required through the JSP process.</p> <p>Recommended change - The supply assumptions should be further examined in order to ensure that the shortfall requirements identified within the Core Strategy are a robust starting point to proceed in order to ensure a sound approach to the preparation of the Site Allocations document. The Council should undertake a more robust assessment (beyond the current tick box exercise) of alternative sites at Locking to include consideration of land West of Locking Parklands as an extension to the Parklands Village allocation for residential development to allow delivery of up to 500 dwellings (to include the 350 already identified), associated open space, ecological areas and landscaping.</p>
St Modwen Properties PLC	-	3568545//2	<p>Clevedon</p> <p>We wish to reiterate our significant concerns from our April 2016 submissions regarding the low level of housing allocations within Clevedon and the deliverability of those limited allocations that are identified within the Plan. We therefore rely on the previously presented case. However, since our earlier submissions there are a number of further issues that we would wish to highlight having reviewed the Council's responses to our comments and the additional evidence base supporting the Publication version of the Plan. In summary, we reiterate that the land West of Kenn Road, Clevedon should be allocated for residential led development as it is the only strategic site option that will deliver any meaningful contribution towards meeting the market and affordable housing needs for the Town. The Council has not produced any robust evidence to counter this proposal. We wish to highlight the following concerns which arise having reviewed the Council's Housing Site Assessment document and the Council's response to the representations (Appendix 4 to 18th October 2016 Executive Committee):</p>

Name	Organisation	Comment ID	Comment Received
			<p>We note that the Council's recorded response to our previous comments seeking additional housing land at Clevedon in principal to support the growth of the Town and remove pressure on smaller settlements is found on page 123 of Appendix 4 to 18th October 2016 Executive Committee. The Council confirms that given constraints around the Town <i>"By a process of elimination further development would therefore have to be limited to land south of the Blind Yeo towards Kenn. It is considered that this location is somewhat divorced from the main settlement of Clevedon and inappropriate for residential development"</i>. We deal with the details below but in summary this statement provides confirmation that the Council has no intention of allowing Clevedon to grow in order to deliver any significant contribution towards affordable or market housing. This is contrary to the aims of the Core Strategy in terms of centring growth in larger settlements and NPPF in terms of boosting housing supply.</p> <p>ii) The current proposed position will exacerbate the existing problems within Clevedon in terms of retaining young families within the town and providing any meaningful affordable and market housing options. Housing developments in the Town delivered through the previous Plan and the Core Strategy have only really delivered apartment schemes with zero affordable housing provision. The Council acknowledges that the Kenn Road location is the only option for growth but dismiss it on the basis of it being <i>"somewhat divorced from the main settlement"</i>. The fact is, the land West of Kenn Road is immediately opposite the Kenn Road Business Park and within walking and cycling distance to the existing built form and facilities within Clevedon. The site benefits from an existing consent and allocation for employment development, if it is was that <i>"divorced"</i> from the existing settlement then how is the site suitable for employment use but not residential use? There is no reference within the Council's response to any technical or rationale planning reasons not to allocate the site. We deal</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>with the employment allocation position within our response to SA5 below</p> <p>Since the April 2016 comments St Modwen has submitted an outline planning application (reference 16/P/1901/O) for residential led development on the land West of Kenn Road proposing upto 200 dwellings and 3 acres of business and community uses. The application has been tested through determination stages and a number of technical matters have been agreed and signed off including the Environment Agency with regards to flood risk. The submission includes a detailed analysis and justification regarding the loss of employment use on the site and we discuss this further in response to policy SA5 below.</p> <p>iv) The Council has not undertaken a robust assessment of the performance of the land West of Kenn Road in comparison to the proposed allocations within Clevedon. We have reviewed the Residential Allocations Assessment and disagree with the findings. We note the site West of Kenn Road has been marked down on grounds of: access to community facilities; flood risk; access to bus transport; pedestrian and cycle links; access to railway station; and settlement boundary. In response, the existing consent and the current application demonstrate that the site can be accessed by bus transport and the site will be linked to pedestrian and cycle access through upgrades to Kenn Road and the Strawberry Line secured through a Section 106 agreement. The latest proposals include community facilities in the land uses and the site will be accessible to the existing facilities in Kenn and Clevedon. Furthermore the site is closer to Yatton train station than any of the sites in Clevedon.</p> <p>The site is demonstrated as being deliverable in terms of flood risk noted by the previous consent, and the fact that the Environment Agency has not objected to the current application proposals. Furthermore the latest application submission is supported by a sequential assessment of flood risk which demonstrates that the site can meet the</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>statutory requirements. This is being undertaken in consultation with the planning policy officers of the Council.</p> <p>The site has been unfairly assessed and summarised as a result of the lack of detailed consideration within the Residential Site Assessment exercise. If the Council had considered the case in more detail (and taken the approach they had at land east of Parklands Village by looking at the application submission) then the scoring matrix would have been more favourable. Furthermore it seems imbalanced to highlighted constraints of flood risk and pedestrian links as reasons not to include the site when these issues equally apply to all of the assessed sites in Clevedon. In addition the issue of greenfield is also raised and this applies to two of the other sites which is not mentioned in the result of the assessment of these sites. We also note that the Yeolands Farm site has been allocated on the basis that it is previously developed land yet it is scored as a red under the relevant objective. If the site or buildings are or were in agricultural use then it is not previously development by definition</p> <p>We note that the Council considers (page 141 of Appendix 4 of the Committee Report) that sufficient land has been identified in the Allocations Plan to meet the Core Strategy targets. We maintain our objection on this assumption. It appears that the Council is continuing to seek to rely on allocations which cannot be demonstrated to be deliverable or achievable. Furthermore the Council does not appear to have undertaken a robust assessment of the delivery of dwellings to date within the Town in terms of the type of accommodation, what needs it meets and the actual delivery of affordable housing. The analysis we have provided within the above mentioned application submission justifies these concerns in detail.</p> <p>vi) In terms of the proposed sites within the Plan, it is clear that the two largest proposed allocations in Clevedon have major concerns</p>

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			<p>regarding deliverability. Firstly we note that the Council accepts (see commentary within page 32 of Appendix 4 Committee Report) that the largest site, Millcross (70 dwellings) is not actually 'deliverable' as it is not 'available' (see paragraph 47 NPPF footnote 12) for residential development given significant uncertainty regarding the potential use for health related development. If the site was to be released in the future for development then there could still be an opportunity to treat the site as a windfall opportunity.</p> <p>The site North of Churchill Avenue (44 dwellings, the second largest allocation in Clevedon) is like Millcross, not supported by the Town Council. The Town Council has raised fundamental concerns regarding the status and availability of this site notably with regards to it's protection as an area of open space and restrictive covenants. The Council's response (page 31 of Appendix 4 Committee Report) fails to provide formal confirmation that the covenants do not apply. The Council notes that part of the site is proposed for open space and play space however it is not clear as to what extent of land this will take and therefore how much land they consider will actually be 'available' and 'deliverable'.</p> <p>Furthermore, our application submission provides further analysis of these sites which demonstrates that they cannot accommodate the number of dwellings envisaged within the allocations when assessing typical density of development surrounding these sites.</p> <p>Recommended change: On the basis of the fact that the Millcross and Churchill Avenue sites do not pass the tests set out within NPPF they must be deleted from the Plan as a residential allocations. There is a clear and logical solution to replacing these sites through the allocation of land West of Kenn Road Clevedon on the basis that as the Council acknowledges (page 123 Appendix 4 Committee Report) that this is "<i>by elimination</i>" the only location for development growth in Clevedon.</p>

Name	Organisation	Comment ID	Comment Received
Mr J Vowles		4600993//1	<p>These representations relate to land at Shipham Lane, Winscombe.</p> <p>The land has been the subject of previous representations made in connection with the Site Allocations Plan March 2016 consultation, under comment ID: 4600993//1. These representations sought the inclusion of the subject land for residential development.</p> <p>The Site Allocations Plan October 2016 (SAP) is, by its own admission (para 1.4), “a transitory plan”. It sits between the now finally approved Core Strategy (following its re-examination and eventual adoption of modified policies last month) but which is subject to review by end 2018 and the emerging Joint Spatial Plan (JSP), which seeks to determine (amongst other things) the objectively assessed housing needs for the district in the period to 2036. However, the JSP is not expected to be adopted until end 2018 at earliest and indeed may be delayed further. The assumed seamless continuation in policy guidance to inform the housing requirements of the district across the time period to 2036 may prove misplaced.</p> <p>Aside of this and the recent attempts by North Somerset Council (NSC) to identify and approve sites for housing to meet the NPPF requirement for a continuous 5 years supply of readily deliverable housing land, it appears evident that NSC are failing to fulfil this requirement as witnessed by most recent appeal decisions. The most notable of these was for 118 dwellings at Sandford, where the appeal was allowed by decision dated mid-October this year. One of the fundamental findings of the appeal was that NSC did not have a 5-year supply of housing land and the assessment for this was based upon the evidence and background documentation which appears to be used as the basis to justify the SAP proposals the subject of the current consultation. No other material consideration was such that it outweighed this conclusion on the part of the Inspector.</p>

Name	Organisation	Comment ID	Comment Received
			<p>Para 4.5 comments that the SAP is being prepared in an “unusual” situation. Notwithstanding these comments and those in paras 4.6 to 4.9, together with Table 1, the concluding comment in para 4.10 that the SAP “identifies the proposed allocations needed to deliver the Core Strategy housing requirement” is not accepted. The recent appeal decision at Sandford is considered to completely undermine this statement and point towards the need for NSC to urgently re-assess the data inputted to derive Table 1 and thence recalculating the findings.</p> <p>In the respondent’s view, there is an urgent need to identify further sites for housing and the suitability of the land the subject of this representation is reiterated in line with the representations submitted in relation to the SAP March 2016 consultation exercise.</p>
Mr J Vowles		4600993//2	<p>These representations relate to land at Coombe Farm, Sandford Road, Winscombe.</p> <p>The land has been the subject of previous representations made in connection with the Site Allocations Plan March 2016 consultation, under comment ID: 4600993//2. These representations sought the inclusion of the subject land for residential development.</p> <p>The Site Allocations Plan October 2016 (SAP) is, by its own admission (para 1.4), “a transitory plan”. It sits between the now finally approved Core Strategy (following its re-examination and eventual adoption of modified policies last month) but which is subject to review by end 2018 and the emerging Joint Spatial Plan (JSP), which seeks to determine (amongst other things) the objectively assessed housing needs for the district in the period to 2036. However, the JSP is not expected to be adopted until end 2018 at earliest and indeed may be delayed further. The assumed seamless continuation in policy guidance to inform the housing requirements of</p>

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			<p>the district across the time period to 2036 may prove misplaced.</p> <p>Aside of this and the recent attempts by North Somerset Council (NSC) to identify and approve sites for housing to meet the NPPF requirement for a continuous 5 years supply of readily deliverable housing land, it appears evident that NSC are failing to fulfil this requirement as witnessed by most recent appeal decisions. The most notable of these was for 118 dwellings at Sandford, where the appeal was allowed by decision dated mid-October this year. One of the fundamental findings of the appeal was that NSC did not have a 5-year supply of housing land and the assessment for this was based upon the evidence and background documentation which appears to be used as the basis to justify the SAP proposals the subject of the current consultation. No other material consideration was such that it outweighed this conclusion on the part of the Inspector.</p> <p>Para 4.5 comments that the SAP is being prepared in an “unusual” situation. Notwithstanding these comments and those in paras 4.6 to 4.9, together with Table 1, the concluding comment in para 4.10 that the SAP “identifies the proposed allocations needed to deliver the Core Strategy housing requirement” is not accepted. The recent appeal decision at Sandford is considered to completely undermine this statement and point towards the need for NSC to urgently re-assess the data inputted to derive Table 1 and thence recalculating the findings.</p> <p>In the respondent’s view, there is an urgent need to identify further sites for housing and the suitability of the land the subject of this representation is reiterated in line with the representations submitted in relation to the SAP March 2016 consultation exercise.</p>
Mrs B Pratt		8133025//1	These representations relate to land at The Batch, west of Mendip Road, Yatton.

Name	Organisation	Comment ID	Comment Received
			<p>The land has been the subject of previous representations made in connection with the Site Allocations Plan March 2016 consultation, under comment ID: 8133025//1. These representations sought the inclusion of the subject land for residential development in conjunction with adjoining lands.</p> <p>The Site Allocations Plan October 2016 (SAP) is, by its own admission (para 1.4), “a transitory plan”. It sits between the now finally approved Core Strategy (following its re-examination and eventual adoption of modified policies last month) but which is subject to review by end 2018 and the emerging Joint Spatial Plan (JSP), which seeks to determine (amongst other things) the objectively assessed housing needs for the district in the period to 2036. However, the JSP is not expected to be adopted until end 2018 at earliest and indeed may be delayed further. The assumed seamless continuation in policy guidance to inform the housing requirements of the district across the time period to 2036 may prove misplaced.</p> <p>Aside of this and the recent attempts by North Somerset Council (NSC) to identify and approve sites for housing to meet the NPPF requirement for a continuous 5 years supply of readily deliverable housing land, it appears evident that NSC are failing to fulfil this requirement as witnessed by most recent appeal decisions. The most notable of these was for 118 dwellings at Sandford, where the appeal was allowed by decision dated mid-October this year. One of the fundamental findings of the appeal was that NSC did not have a 5-year supply of housing land and the assessment for this was based upon the evidence and background documentation which appears to be used as the basis to justify the SAP proposals the subject of the current consultation. No other material consideration was such that it outweighed this conclusion on the part of the Inspector.</p> <p>Para 4.5 comments that the SAP is being prepared in an “unusual” situation.</p>

Name	Organisation	Comment ID	Comment Received
			<p>Notwithstanding these comments and those in paras 4.6 to 4.9, together with Table 1, the concluding comment in para 4.10 that the SAP “identifies the proposed allocations needed to deliver the Core Strategy housing requirement” is not accepted. The recent appeal decision at Sandford is considered to completely undermine this statement and point towards the need for NSC to urgently re-assess the data inputted to derive Table 1 and thence recalculating the findings.</p> <p>In the respondent’s view, there is an urgent need to identify further sites for housing and the suitability of the land the subject of this representation is reiterated in line with the representations submitted in relation to the SAP March 2016 consultation exercise.</p>
The Church Commissioners for England	The Church Commissioners for England	8135297//1	<p>We write on behalf of our client the Church Commissioners for England (the Commissioners) who manage a well-diversified investment portfolio to support the Church’s work across the country and are long-term landowners in the North Somerset area. We understand that the Council are currently consulting on the Site Allocations Plan 2006 – 2026: Publication Version.</p> <p>We submitted representations in relation to land known as the Veale, Bleadon on behalf of the Commissioners to the draft Site Allocations Plan consultation in April 2016. Following a review of the Site Allocations Plan 2006 – 2026: Publication Version, we understand that the Veale (the Site) has not been allocated as a site for residential development.</p> <p>The Commissioners supports the aims of the Site Allocations Plan 2006 – 2026 and one of the key objectives of the proposed Core Strategy in terms of delivering new sustainable housing development across North Somerset. We also acknowledge the need to identify a supply of immediately available sites.</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>On this basis and notwithstanding the comments received by North Somerset District Council in relation to the Site, the Commissioners still consider that the Veale, Bleadon is suitable for a sensitive residential development. The Site is entirely within the ownership of CCE and we have reiterated below the reasons why the Site is deliverable, immediately available and suitable for allocation</p> <p>The Veale, Bleadon</p> <p>Available for Development: Short to Medium term</p> <p>The Site is located at the eastern edge of Bleadon village adjacent to the settlement boundary and is currently used for agricultural purposes. The Site is bounded on three sides by existing housing, with a strip of woodland to the south and represents a natural extension to the village, with good access to the existing facilities.</p> <p>Bleadon is located 4.6 km to the south east of Weston-super-mare; the A370 connects the settlements and provides access to several bus routes. Access to the Site is currently via a gate from The Veale, accessed from Shiplate Road, the arterial road in the settlement.</p> <p>The proposed Core Strategy policy CS14: <i>Distribution of new housing</i>, states that development outside settlement boundaries will only be acceptable where the Site is allocated in the Local Plan or where it constitutes sustainable development which accords with CS28, CS31, CS32 and CS33. We recognise that it also states that development "must not conflict with environmental protection, Green Belt ...".</p> <p>The Site is located in the South Hill SSCI however the Commissioners has commissioned the attached Extended Phase 1 Habitat Survey to examine the vegetation, habitats and the Sites potential to support a range of protected species. The report concludes that the grazed semi-improved grassland habitat is common and</p>

Name	Organisation	Comment ID	Comment Recieved
			<p>widespread though the UK and is considered to be of ecological value at Site level only. The narrow strip of grassland and deciduous woodland to the south of the Site are considered to have ecological value and would be retained as part of any scheme.</p> <p>The Site is also located wholly within Flood Zone 1 and is not within the Green Belt. Therefore, the development of this site would not conflict with CS14.</p> <p>The policy, CS14, further states that residential density will be determined primarily by local character and good quality design. The target net density across North Somerset is 40 dwellings per hectare. The Site measures 0.7 hectares and the Commissioners consider that a development of between 15 and 20 houses would be suitable on the Site in light of the rural setting and upwards slope to the south of the Site</p> <p>Whilst the Site sits outside of the designated settlement boundary it has good access, existing development on three sides of the Site and a dense tree line to the south representing a strong boundary to future development. The Site forms a natural extension of the village which would not have any negative impacts on openness. The Site represents a sustainable Site suitable for residential use.</p>
R Burrows	-	939361//3	<p>I note my clients site(s) at Ladymead Lane have been omitted from the current Site Allocations Plan despite being looked upon favourably in previous SHLAA and HELAA exercises.</p> <p>I attach the completed forms for those exercises in 2014 & 2015 and I had been informed that these had been rolled on to any subsequent exercises, however I can't find where they have been discounted and why they have been omitted from the current consultation in favour of other sites that appear in less suitable locations.</p>

Name	Organisation	Comment ID	Comment Recieved
			Could you please add these to the responses for the inspector to decide on allocation.

Section Public comments on other sites put forward

Name	Organisation	Comment ID	Comment Recieved
Katrina Russell		14828033//1	<p>We agree with the Council that the site Land South of Cox's Green HE14179 should not be included in the Sites Allocation Plan. However, we feel there are a few points in the Residential Site Assessment that need revising.</p> <p>2.1 Community Facilities – the site has been awarded Green, however the access to the community facilities from the site are not considered to be safe and the distance not convenient. The village services from the proposed site is inappropriate. The village shops would be at least 1Km from the site, a distance that most people would choose to travel by car over walking. The “Shaping neighbourhoods for local health and global sustainability” report states that between 1-2.5km only 25% of journeys are carried out by foot. You can’t nip to the shop quickly on foot to buy a pint of milk. It would take you almost half an hour round trip.</p> <p>The walk into the village itself is not suitable. There are stretches of road with no pavements along Cox's Green and further into the village anyone walking in would meet another narrow stretch of road with no pavement just past Rickyard Road and again the pavement disappears as Silver Street bends around the corner past the Memorial Hall into the village. Here parked cars force people with buggies into the road from the corner, up past the Pharmacy into the village. Crossing the road here is dangerous. There is often a lot of parked cars, delivery lorries and congestion.</p> <p>The walk into the village involves a number of crossings. It is necessary to cross the road opposite the entrance to the recreation ground as the pavement ends on one side and starts on the other. This is on a corner, which poses problems especially with children who are not able to cross the road quickly. The walk is also poorly lit and is particularly uninviting at night. We live in Cox’s Green and carry a torch if we do need to walk in after dark.</p> <p>Driving and parking in the village is also problematic. There isn’t a car park and there are often difficulties in finding a place to park.</p> <p>There are no cycle routes in or around the village. The roads are windy and busy with cars and other vehicles making cycling dangerous.</p>

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			<p>2.2 With regards to the Primary Education, although Pupil Projection figures may show that the school has capacity or the ability to expand, the site would not meet the requirements of having a “Safe Route to School” to Wrington Primary and at 1.3km is outside the “Walking Zone” of the school. The School already has existing problems with parents driving to school and parental parking is considered problematic to people living near the school and a danger to those walking to school (ref. Wrington Primary School’s Travel Plan). Children living on Cox’s Green would need to be offered Transport to School as the walk is considered hazardous. NSC states that “School places can only be deemed to be available to development residents if accessible via a Safe Route to School”. Therefore, the Wrington Primary School would not be considered “available” to development children.</p> <p>2.4 Employment - The site has been allocated a Green rating. Although the site is adjacent to Havyatt Industrial Estate and close to the Burnett Industrial Estate, these estates are only small and provide limited employment to residents in the village. The close proximity to these sites alone, should not result in a Green rating. The actual availability of job opportunities here and within the village needs to be taken into account, which is considered low. This has been recognised by the Council in this consultation in the assessment of Wrington within the <i>Assessing Sustainability and Settlement Hierarchy in rural Settlements</i> document, which states “...some offices and shops which were trading only a few years ago are now houses and flats. The banks have closed. Business start-ups recorded as 24, which is one of the lowest recorded across the district.” The RAG rating in this document for Wrington under Economic – Thriving is A- (Amber minus).</p> <p>The other 2 sites assessed at Butts Batch and South of Wrington, have been given an Amber rating and we feel that the site at Cox's Green should also be given an Amber rating. All 3 sites, as is the whole of Wrington, are in close enough proximity to the Industrial Estates and local businesses, to be easily accessed if job opportunities did become available. It is the lack of available job opportunities arising from these small businesses that is the main issue and to say that there is a “good access to a wide range of job opportunities” is not the case.</p> <p>2.4 Wrington no longer meets the requirements of a Service Village, as it has lost its Doctor's Surgery, bank, no longer has a bus service to Bristol and no bus service on a Sunday and if villages were to be reconsidered now, Wrington would no longer be classified as a Service Village. In fact, it has less services and is considered to be less sustainable than many of the infill villages.</p>

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			<p>5.1 Bus Transport – the site has been awarded Green. To say that this site or Wrington has a reasonable access to sustainable transport is not true. Although there maybe a bus every 60 minutes, surely the destination of these buses needs to be considered and the time it takes to get there e.g. there is no direct bus to Bristol or even a bus to Yatton. A more detailed report was submitted by Wrington Village Alliance in their objection to housing at Cox's Green.</p> <p>5.3 Pedestrian Cycle Links – the site has been awarded amber yet there is incomplete pavement to the limited facilities in the village, with pedestrians having to navigate the unpaved areas if they choose to walk into the village. There is also the need to cross the road by Burnett Industrial Estate at a point where there is a bend in the road.</p> <p>5.5 Settlement Boundary – the proposal is shown as amber but is a large development and therefore not compliant the Core Strategy.</p>
BHFP		1587713//1	<p>I strongly disagree with any development between Nailsea and the Ancient Protected Tower House Woods</p> <p>The land is Greenbelt and should be kept as such for people in Nailsea and Wraxall and all surrounding areas. Kids to play, dogs to be walked, wildlife to thrive and the natural beauty of the valley.</p> <p>Any development could harm the Ancient Woodland that needs to be protected not to mention the river and the wildlife that live there and the surrounding greenbelt area.</p> <p>This Greenbelt area regularly floods and not just in winter. Even when the fields don't look flooded they are sodden all winter.</p> <p>There are so many people that would be affected negatively by this development. Quality of life and the enjoyment of living in an area that I personally think should be an Area of Outstanding Natural Beauty.</p> <p>Both Tickenham and Wraxall have very small primary schools on the main roads and the extra traffic would make it even more dangerous. Especially Wraxall where the visibility is already so bad with people driving dangerously and sometimes not even stopping for the lollipop lady!!</p>

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			<p>There is absolutely no need to ruin this beautiful area. We want to keep our Greenbelt for what it was intended.... and that was most definitely not to be build on!</p>
<p>Tim Hawes</p>		<p>15955489//2</p>	<p>Objection to Sites and Policies Plan part 2: Site Allocations Plan</p> <p>Proposal to use 3.2 hectare area of land north of Lyefield Rd for housing</p> <p>I am writing to strongly object to the use of the area of land north of Lyefield Road for housing development.</p> <p>Facts supporting my objection:</p> <ol style="list-style-type: none"> 1. The total inadequacy of the road network to provide access to additional properties. Lyefield Road is a narrow (less than 4m in places) roadway with no footpath. It is impossible for 2 vehicles to pass at numerous points along the roads length. Newtons road is also similarly totally unsuitable to provide access to a major housing development due to its narrow width. Planning permissions have already been refused for additional access onto Lyefield Road because of the very narrow carriageway. 2. Significant negative impact on the landscape as they are green field sites. The proposed development areas to the north of Lyefield Road, area bounded by Collum Lane, Lyefield Road and Lower Norton Lane plus the area bounded by Lower Norton Lane and Kewstoke Road are all completely unsuitable areas for major housing development. All the roads are very narrow and completely inadequate to deal with the major increase in traffic volumes. There would be a significant safety risk to the many walkers, runners, cyclists and horse riders that regularly use these roads. 3. Submission from Tetlow King dated 28th April 2016. The submission on behalf of the owners clearly carries a large financial incentive. There are a number of inaccuracies in the submission: <p>Reference is made to the score in the Sustainability Appraisal Site Assessment Document which details a much more favourable score than the facts bear out (see my separate document)</p>

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			<p>Claims are made that the site should be allocated now. Under no circumstances should this site be allocated for housing – the completely inadequate road access and significant detrimental effect on the natural beauty of the area are overwhelming reasons to refuse housing development.</p> <p>Claims are made that the site is more sustainable than 10 other sites. How can a site be sustainable that has no adequate road access and would have a significant detrimental effect on the look of the local landscape as the housing boundary is being moved onto a green field site?</p> <p>Tetlow King claim that the Draft Site Allocation Plan does not represent the most appropriate strategy when considered against the alternatives. Quite correctly the Draft Plan has said “no” to development on the land to the north of Lyefield Road. Refusing this site is the most appropriate strategy. There are many alternative sites that have adequate road access and would not impact so severely on the natural landscape. Clearly the large financial incentives mean that submitting arguments for development that are credible and unbiased are challenging.</p> <p>Tetlow King claim that the Draft Site Allocations Plan does not pass the tests of soundness in relation to being “positively prepared”. The tone of comments like this demonstrate a degree of desperation and clutching at straws in an attempt to secure a large monetary gain for their clients and no doubt substantial fees for themselves.</p> <p>I strongly urge that the Draft Site Allocations Plan should clearly show that the land north of Lyefield Road is completely unsuitable for housing development. Similar unsuitability should also be shown for the land bounded by Collum Lane, Lyefield Road and Lower Norton Lane as well as the land bounded by Lower Norton Lane and Kewstoke Road.</p>
Martin Law		16016673//1	<p>I wish to object to the proposal by LVA to develop land north east of Nailsea in the Parish of Wraxall and Failand.</p> <p>1) The site is a flood plain due to its proximity to the Land Yeo, as evidenced by the attached photos taken this November.</p>

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			<p>2) The land is in the Green Belt which acts as a buffer preventing Nailsea Town sprawling into the ancient village of Wraxall.</p> <p>3) The proposed 600 houses (double the size of The Elms in Wraxall) cannot be supported by local employment. This could mean 1000+ cars commuting to Bristol and WSM further clogging up an already very busy country road, the B3130.</p> <p>4) Putting a Nailsea by-pass through the middle of the proposed estate is crass.</p> <p>Also any link from the M5 has to avoid the narrow and dangerous bottle-neck on the hill between Jacklands Trout Farm and the T junction of the B3130 and B3128</p> <p>I note NSC have stated they are committed to retaining this land as Green Belt which I welcome.</p>
J Parkinson		16037217//1	<p>I am surprised that the area to the Northeast of Nailsea is being considered for any housing let alone several hundred. I list the following reasons.</p> <ul style="list-style-type: none"> • The proposed development would butt up to the Land Yeo river whose valley is rich in wildlife which will be lost in the process. This valley at the moment is home to otters, water voles (The U.K's most endangered mammal), bat species, endangered birds like the grey wagtail (on the most endangered red list and the snipe and kingfisher (on the amber list). Reptiles including the slow worm, grass snake and adder are found here. The latter is a particularly species in England. • This is green belt land of importance, firstly the reasons listed above, but secondly to stop the nibbling away of the land between Nailsea and Wraxall which would eventually see the former digest the latter.
Gordon Wilkins		16064033//1	<p>I object to the planned development at Collum Lane/Ebdon Road on the following grounds:</p> <ol style="list-style-type: none"> 1. It will cause increased road congestion. 2. Increased flood risk. The low lying fields in question were recently flooded transforming the site into a lake. 3. Inadequate infrastructure. Weston continues to grow inexorably whilst infrastructure such as police stations and libraries close.

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			<p>4. Damage to wildlife. Everywhere wildlife is in retreat, and no wonder when unbridled development such as this continues on greenfield sites.</p>
Jon Ellis		16064833//1	<p>I wanted to raise objection with regards to the proposal to develop the land to the North East of nailsea. I regularly walk the right of way through this area and have to avoid after rain as it is always flooded, very deeply after persistent rain. Any development of this land would require vast attenuation systems for rainwater to ensure betterment of the existing naturally draining open land, to such and extent I doubt they would be commercially viable. The area is also subject to high radon so development would likely need mechanically vented subfloor voids which would again add costs. Finally the ground conditions are very poor and would likely require piling, as per boreholes on British geological society website.</p> <p>I also feel any development would adjoin Nailsea to the adjacent village and would destroy any semblance of a border to this edge of the town.</p> <p>I also would have objections with regards to the natural wildlife habitat which would be lost, I regularly see herons in the watercourse and would be a shame to move them, and other birds, reptiles etc away with development of the area.</p>
Graham and Leanne Lloyd		16064865//1	<p>I live in Woodland Road, Nailsea. I have just found out about the proposed residential development as mentioned above. I would like to raise my concerns-</p> <p>1. The existing houses in my and surrounding streets were built in the mid 1950s. The drainage was not designed for today's weather events e.g. Prolonged heavy downpours.</p> <p>2. We also have a shared drainage trench that runs the lengths of our road, possibly known as Land Yoe. Freddie Holland of North Somerset council is currently looking into getting it cleared to improve water run off, but we are still waiting to hear about it. This often floods some gardens in Greenfield Crescent and Woodland Road. This water has no where to go. If the land close by is developed then our concern is that the ground will not be able to cope with increased volumes of surface rain water. This will increase the likely hood of flooding to existing properties.</p>

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			<p>3. The land at Jacklands lake appears flooded during wet rainy periods as it's at the bottom of a valley. What does the environment agency say about flooding implications of this development?</p> <p>4. This would ruin the natural habitat for local wildlife and insects.</p>
Vanessa Webb		16064897//1	<p>I am writing this in anticipation of the deadline for consultation of the North Somerset Site Allocations plan on December 19th 2016.</p> <p>Although I understand that the Planning Inspectorate are demanding that local councils throughout the country, supply more housing over the next 5 years, I trust that NSC continue to reject this development proposal by LVA, on the basis that the site lies within the Green Belt and that exceptional circumstances do not exist to warrant a review of the Green Belt in this area of Nailsea and I support NSC in this decision. This was stated in the national Planning Policy Framework published 2012:</p> <p><i>“Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan”.</i></p> <p>The Proposal</p> <p>It is hard to make any rational observation on the ‘Concept Masterplan’ that was first drawn up by <i>Thrive Architects</i> on 4th November 2014. Such drawings alone can be misleading. It is just a feasibility study, with twenty-one brown coloured blocks that indicate residential development. At this stage, there are no details, elevations, or any other indication of design, but it is clearly going to consist of a mixture of affordable housing, flats and terraced houses. This has been confirmed by the architects. The figure of 600 homes has been calculated from the ‘Net Residential Area’ of 19.75 hectares, at a building ratio of 30 houses per hectare. The implication of this is high density mixed accommodation, comprising social housing and private residential, instead of the traditional properties with gardens that border this site. Such development would not only look out of proportion to the scale of the current homes and gardens in the adjacent Southfield Road, it would also be aesthetically inappropriate for this ‘green belt’ area bordering Nailsea.</p>

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			<p>I notice on the LVA's planned proposal that a small amount of Public Open Spaces have been allocated within the proposed development. These would only serve the residents of this development, especially if some properties do not have gardens and would be inadequate, compared to the valuable natural habitat we enjoy now, which cannot be replaced by planned public spaces.</p> <p>If this land is taken out of the green belt, it will be the beginning of a decline in our semi-rural local environment. The idea of Green Belt was created to protect areas from too much urban development taking place.</p> <p>It appears that (LVA) are seizing the opportunity presenting itself, regarding the demands of the Planning Inspectorate and hoping their proposal will go 'under the radar', in the knowledge that NSC are struggling to meet the 5 year housing supply demand, and might give in, if put under pressure.</p> <p>Infrastructure</p> <p>The local highway infrastructure surely cannot sustain such development? The B3130 to the west is already a 'bottle neck', with cars and heavy lorries unable to pass easily through on Clevedon Road before the junction with Tickenham Hill. Tower House Lane is already used as a cut-through and is too narrow for cars travelling fast, which they frequently do. It is no longer enjoyable or safe to walk along the lane because of this. At the other end of the site, to the east, the B3130 from Bristol meets Budgens and the GE Oil and Gas roundabout, which is already under pressure from traffic. The existing road system is already suffering from an increase in population. If this development goes ahead, commuter traffic and pollution will increase in intensity.</p> <p>Environment</p> <p>Many people locally, care about and enjoy this piece of land for recreation, which includes the land adjacent to it along the Land Yeo, wetlands, trout farm and Tower House Woods. I have lived in the area for 15 years and have taken many walks with friends who live here and those from outside, who also now enjoy the habitat and wildlife that can frequently be seen due to its abundance. It is also an area rich in history. It is an important amenity for dog walkers, where cattle and horses graze on the pasture there. It is already a very small 'buffer' between the town and countryside.</p>

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Jonathan		16069697//1	<p>Site Allocations Plan 2006 – 2016 (Publication Version November 2016) Response by Dr Jonathan Palmer</p> <p>I am writing this in anticipation of the deadline for consultation of the North Somerset Site Allocations plan on December 19th2016.</p> <p>Although I understand that the Planning Inspectorate are demanding that local councils throughout the country, supply more housing over the next 5 years, I trust that NSC continue to reject this development proposal by LVA, on the basis that the site lies within the Green Belt and that exceptional circumstances do not exist to warrant a review of the Green Belt in this area of Nailsea and I support NSC in this decision. This was stated in the national Planning Policy Framework published 2012:</p> <p><i>“Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan”.</i></p> <p>The Proposal</p>

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Vanessa		16069729//1	<p>Site Allocations Plan 2006 – 2016 (Publication Version November 2016)</p>

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ALAN BAKER		16079393//1	<p>I am deeply concerned about the proposal to build on green belt land. It has been stated this should only occur under exceptional circumstances and I fail to see any such circumstances to warrant the development of the land to the north / NE of Nailsea. The area around Land Yeo floods most winters (indeed also sometimes in summer!) and is constantly boggy all winter, every winter. Climate change will only worsen this. Further to this the land is of historic interest due to it being a Mesolithic site. The land is not in a position close enough to enable use of the Nailsea and Backwell train station without residents having to drive and park there. With parking already limited this would encourage residents to drive their whole commute. Any road to access the development has the potential to direct traffic away from the town centre and it's amenities and businesses and would also encourage traffic to travel from Clevedon - Tickenham - Nailsea - Wraxall - Bristol, rather than just along the top B3128 road to Bristol, therefore increasing traffic through the north Nailsea development and through Wraxall on the B3130. The latter road is already dangerous for the children at Wraxall school that have to cross it and North Somerset council have withdrawn funding for the crossing patrol. To build on allocated green belt land is to undermine the very principal of countryside and environment protection and would be the thin end of the wedge in terms of destroying special areas of the local environment. To reallocate green belt land in one place would mean the same would need consideration in all areas, thus opening a minefield of possibilities for developers an planners to disregard the countryside in any area. The Land Yeo valley is a peaceful, tranquil valley that provides a natural boundary between Nailsea and Wraxall and should be protected.</p>

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Rachel Watts		16080193//1	<p>I believe that the building of residential units in the north west of Nailsea (NW1) is not suitable.</p> <p>-Although it is Wraxall Parish Land, it's impact on Nailsea residents would be much greater than those in Wraxall.</p> <p>- it is an area with drainage issues which regularly gets flooded. Greenfield Crescent adjacent to this area often has high levels of water during wet weather and these fields are often underwater during wet periods.</p> <p>-A wide range of wildlife is resident in this are including barn owls, dormice and kingfishers. It is also used by many residents and provides a greenslade for children to play and residents of Nailsea to exercise.</p> <p>-the proposed development would mean greater traffic driving to this area from Tickenham and Wraxall, both areas with primary schools on main roads which would be affected.</p> <p>I believe that development to the south of Nailsea would be much more beneficial. There is a railway in place providing opportunities for commuters to reach Bristol and better developed main roads.</p>
TJLock		16084641//1	<p><u>Objection to LVA's proposal for North East Nailsea</u></p> <p>Whilst I appreciate that North Somerset Council (NSC) have to allocate sites suitable to provide circa 20,000 additional homes I strongly object to the plans/proposals submitted by Land Value Alliances and support NSC in their decision not to allow this area of green belt to be developed. The following points form my reasons for my objection:</p> <ol style="list-style-type: none"> 1. The area is a natural and important break between Nailsea and Wraxall providing: <ol style="list-style-type: none"> 1. An essential open space for recreation 2. A precious habit for wildlife including otters and kingfishers. 3. An essential area of countryside for locals to enjoy 2. This green belt is a key area of land that needs to be maintained to ensure the above in 1 are maintained and enhanced and not urbanised which would not only destroy this area of green belt but would adversely affect the nearby trout farm, river and woodland.

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			<p>3. As the land is low lying and is subjected to frequent flooding any development would:</p> <ol style="list-style-type: none"> 1. Increase the occurrence of flooding to the area already designated by the Environment Agency as a level 3 flood zone due to increase in run off. 2. Mean that the development itself would be at risk of flooding – surely against therefore not sustainable. 3. The Land Yeo would be expected to carry more water which could damaging the river itself,, Jacklands fish farm and the area of SSSI beyond the B3130. <p>4. The level and size of the proposed development is completely out of keeping with the site and surrounding area and other areas within Nailsea and Wraxall,</p> <p>5. Care should be taken in any assumptions that any developer, including LVA, makes on the proportion of local jobs which would be created as there are numerous office, retail and industrial spaces are available already in Nailsea that are vacant and therefore the need or demand for new spaces is likely to be limited if not zero.</p> <p>6. The nearby roads especially the B3130 and B3128, lanes and residential streets are already congested causing both risk to the existing users and local residents. Any further development and therefore increased traffic levels would not be sustainable with the current infrastructure and would increase congestion, risk of accidents and pollution. It should be noted that the possible link road indicated on LVA’s plans isn’t part of their development and even if it did go ahead it wouldn’t actually solve the transport issues especially around Wraxall Hill and at the bottom of Tickenham Hill.</p> <p>On the basis that NSC have already rejected the proposed development by LVA and that no exceptional circumstances exist to warrant a review of the Green Belt in this area of Wraxall, I urge NSC and any possible future inspector whom may consider LVA’s proposal to maintain NSC’s current policy and protect and maintain this area of Green Belt for current and future residents of Nailsea and Wraxall</p>
KATE BAKER		16085793//1	I object strongly to the proposal to reallocate greenbelt land in order to develop the land to the north of Nailsea.

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			<p>The land regularly floods and the issue will worsen as climate change progresses.</p> <p>The site is not near to the train station, therefore requiring residents to drive to the train station, thus encouraging car use - particularly as restricted parking will encourage the use of cars for their full commute. This is against the priorities of the joint spatial plan.</p> <p>Any road associated with this development, if linking to the B3130 near GE and Budgens, would discourage passing traffic from utilising town centre businesses and amenities. It would also encourage some traffic currently using the B3128 to travel from Clevedon to Bristol to instead pass through north Nailsea and Wraxall, thus increasing traffic in these areas, notably past Wraxall primary school.</p> <p>No "exceptional circumstances" exist to warrant the use of this current greenbelt land. This is one of the priorities stated in the joint spatial plan.</p>
G.E and A.J Lindley	-	16089121//1	<p>It is imperative that the Green Belt status for this area be preserved and protected and that this proposal be rejected.</p> <p>The proposal to erect 600 houses and 2 commercial areas would have a catastrophic effect on the volume of traffic – commercial and private using the local country roads which are already very busy and not in the best of repair. The proposed new access points in the West and East of the development would disgorge traffic at difficult intersections adding to the delays which are not infrequent at these two positions.</p> <p>There are pipelines for carrying kerosene(?), left over from the last war, which cross the region; there is an archaeological site of a Roman villa; there was a cock pit – these would need to be taken in to account and might well restrict the area available to some extent.</p>
G.E and A.J Lindley	-	16089121//2	<p>Subject: Site allocation consultation for North Nailsea (Yeo Valley)</p> <p>The Site Allocation Consultation Plan for the Yeo Valley area North of Nailsea was brought to our attention just yesterday</p>

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			<p>December 15th. with the invitation to submit comments having the deadline of December 19th.</p> <p>We would like to make the following points:-</p> <p>It is imperative that the Green Belt status for this area be preserved and protected and that this proposal be rejected.</p> <p>The proposal to erect 600 houses and 2 commercial areas would have a catastrophic effect on the volume of traffic – commercial and private using the local country roads which are already very busy and not in the best of repair. The proposed new access points in the West and East of the development would disgorge traffic at difficult intersections adding to the delays which are not infrequent at these two positions.</p> <p>There are pipelines for carrying kerosene(?), left over from the last war, which cross the region; there is an archaeological site of a Roman villa; there was a cock pit – these would need to be taken in to account and might well restrict the area available to some extent.</p>
Kate Lawson	-	16089601//1	<p>I am a resident of Southfield Road I am extremely angry that I have only just heard about the consultation. It was only by chance another resident had just heard the same way.</p> <p>I feel that we have purposely been ignored as the land is designated in Wraxall, even though it is on our doorstep.</p> <p>This will be another 'Elms', only bigger, that will flood Nailsea, and congest our already over populated town, using all our amenities(schools, doctors etc) that we pay for! Wraxall and Failand Parish Council yet again get something for nothing!</p> <p>This is not even touching on the fact we will be losing our countryside that my children play in, I walk our dog, and we enjoy as a family. Added to that it will seriously de-value a lot of housing and add a lot of noise pollution and add serious weight to the traffic on the local roads.</p> <p>I would have thought that as you are Nailsea Council you would have more objections that any individual and would have been keeping us residents up to date on all issues, and have our backs! Should this go through it will bring into question any future raise in council tax as why should we pay for them?</p>

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Cathy Churchill	-	16090945//1	<p>As a local resident in Nailsea I am writing to voice my objection to the proposed plans to build houses on the site near Wraxall and Nailsea. I wish for this objection to be logged with "The Wraxall and Failand Parish Council".</p> <p>Nailsea is already a busy small town with the main road in from Wraxall being extremely busy for a lot of the day. I can't imagine the roads coping with an influx of even ,more traffic. Plus, this green land is one of the few areas that we can get to see animals and wildlife; one of the reasons for buying my property is that I could see green fields and cows from my window...what a depressing thought to think that it could all be taken away to be replaced with years of unwanted building noise culminating in an eye saw of built up houses and concrete!</p> <p>Please consider this very carefully!</p>
Patrick Smallbone	-	16091265//1	<p>The green belt, which is at risk, serves five important purposes:</p> <ul style="list-style-type: none"> • to check the unrestricted sprawl of large built-up areas, • to prevent neighbouring towns merging into one another, • to assist in safeguarding the countryside from encroachment by providing a buffer zone, • to preserve the setting and special character of historic towns, • to assist in urban regeneration, by encouraging the recycling of derelict and other urban land (brownfield sites). <p>There is a need to preserve the greenbelt as a buffer between the village of Wraxall and the town of Nailsea, thus preserving the special character of the village and preventing merger of the two. Land north of Greenfield Crescent is used as a sports field by many local groups and is the site of an air/army cadet building and the surrounding open country is used as part of the training experience for these groups. The existing open fields, traversed by footpaths, provide free amenity to walkers, dog owners, children, ramblers clubs and runners at a time when the nation is been encouraged to get outside and exercise. The footpaths are used by folk of all ages and local scout/guide groups as well as groups of school children under teacher supervision are learning to appreciate the countryside. Jacklands Trout Farm, a small local business working sympathetically with wildlife, not only teaches people of all ages to fish but provides them with the chance to engage with habitat, learn about diversity of nature and take part in pond dipping activities which are particularly beneficial for</p>

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			<p>small children. The business welcomes local school groups, disabled and disadvantaged children and adults. The business acts as a valuable educational resource, as well a small commercial business. The adjacent lake(s) habitat provides rich wildlife resources for barn and tawny owls, herons, cormorants, kingfishers, voles, newts, swifts and swallows. Bats, ducks, hawks, buzzards, moorhens and other wetlands birds all appreciate this rich natural wetland habitat which would be threatened by encroachment of housing and commercial businesses and the associated transport links.</p> <p>The wildlife corridor between Wraxall and Tickenham Moors is a buffer to the edge of Towerhouse Wood preserving rich habitat and a natural food chain for wildlife. The suggestion of a transport link from Clevedon Road to Wraxall, avoiding Nailsea traffic lights, is unworkable because the traffic pinch points are at Stone Edge Batch and within Wraxall village. This is further compounded by the low rail bridge at Backwell. Any link road to the north of Greenfield Crescent / Woodlands would not alleviate traffic congestion but merely add to the existing strain due to the inadequate infrastructure of the surrounding roads. The capacity for commercial/light industrial business premises already exists within the local area as there are many vacant offices, retail and commercial premises.. There is no suggestion that there is a need for further commercial, residential or retail facilities on an existing greenfield site when there is a vast opportunity to redevelop existing brownfield areas to provide the necessary capacity of business and residential accommodation.</p> <p>Whilst the development of greenfield sites may be a better opportunity for developers and the council, i.e. rich pickings, this is not necessarily the best solution for the local community.</p> <p>A better option would be for some of the greenbelt north of the Greenfields Crescent / Woodlands area to be planted with trees to enhance the habitat and reduce water run-off whilst redeveloping existing underutilised brownfield sites in the local area. This opportunity does not appear to be included within any wide consultation involving local inhabitants as decisions appear to be made by Nailsea Council in closed sessions regarding Wraxhall land.</p> <p>The key points that seem to have been overlooked are as follows:</p> <ul style="list-style-type: none"> • increasing noise level and disruption to existing established residences,

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			<ul style="list-style-type: none"> • increasing light spill and disruption to existing established residences and wildlife, • degradation of diversity of local flora and fauna and ecosystem, • inability of the transport and road infrastructure to accommodate additional traffic volumes, • a lack of a traffic impact assessment, • a lack of environmental impact assessment, • a lack of an ecology assessment, • the complete omission to understand the impact of the resulting increased flood risk to existing residences and business properties within the Nailsea, Tickenham and Clevedon flood risk zones.
Gary and Sue Brooks	-	16096865//1	<p>Re: Land between North East Nailsea and the Ancient Tower House Woods</p> <p>I strongly object to LVAs plan to build 600 houses on the green belt land at the NE of Nailsea.</p> <p>Apart from being constantly boggy and prone to flooding even on the higher elevations, this area is closely connected to the Ancient Protected Tower House Woods, which would not happily survive without it. The two spaces together, in my mind, constitute an Area of Outstanding Natural Beauty and are a haven for a wide variety of wildlife.</p> <p>Access to Nailsea, Twickenham and Wraxall is severely restricted as it is, and a development of this scale would make the roads unbearable!</p> <p>Please keep this beautiful valley for future generations to appreciate as much as we do.</p>
Gary and Sue Brooks	-	16096865//2	<p>I strongly object to LVAs plan to build 600 houses on the green belt land at the NE of Nailsea.</p> <p>Apart from being constantly boggy and prone to flooding even on the higher elevations, this area is closely connected to the Ancient Protected Tower House Woods, which would not happily survive without it. The two spaces together, in my mind, constitute an Area of Outstanding Natural Beauty and are a haven for a wide variety of wildlife.</p>

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			<p>Access to Nailsea, Twickenham and Wraxall is severely restricted as it is, and a development of this scale would make the roads unbearable!</p> <p>Please keep this beautiful valley for future generations to appreciate as much as we do.</p>
Adrian Bryant		16101025//1	<p>I object to the speculative proposal by LVA to develop land north and north east of Nailsea.</p> <p>Firstly, this land is already designated as Green Belt, and if the notion of a 'Green Belt' is to be taken at all seriously in future, then it should remain that way. I suspect that LVA is trying to garner some support in the south of the town by suggesting that the Green Belt could be lifted here, but then extended to the south of the town to compensate. If this were to be permitted, it would set a dangerous precedent for other developments.</p> <p>As already highlighted by some of the other respondents, the land is prone to regular flooding and a further development between the northern boundary of Nailsea and the Land Yeo would further reduce the soakaway areas and only serve to exacerbate this problem. This could cause flooding for some of the residents of Tower House Lane, Birdcombe Court Farm, and residents of the proposed development, plus there would be many other environmental implications.</p> <p>While the development could be accessed from two of the main routes into Nailsea (the B3130 in and out of Nailsea), neither is really adequate for any further traffic, especially heavy goods vehicles. It is difficult enough for two buses to pass each other through parts of Wraxall and Tickenham, let alone articulated lorries. The residents of Wraxall and Tickenham already suffer a great deal of road noise from passing traffic, especially at peak times, and the additional traffic would have an adverse effect upon their quality of life, not to mention their health.</p> <p>The land is sited on the opposite side of town from the railway station, so most rail commuters would still need to use their cars for at least part of their journey. There would also be a need for a further extension of the car park at Nailsea and Backwell Station.</p> <p>Wraxall Primary School is already oversubscribed in some year groups, and the existing primary schools in Nailsea do not have sufficient places to support an additional development of this scale.</p>

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			<p>There has been talk of maintaining a natural 'buffer' between Nailsea and other areas such as Backwell. With 'The Elms' being effectively joined to Nailsea, despite being part of Wraxall, this land is all that remains as a buffer between Nailsea and Wraxall.</p> <p>Therefore, I hope that North Somerset Council will continue to oppose any alteration to the Green Belt and reject this proposal.</p>
Woodland Trust	Woodland Trust	3326881//1	<p>We submit the following comment in relation to Schedule 1 - Schedule to Policy SA 1 of the above document.</p> <p>Although it does not appear to be currently listed in Schedule 1, we understand that North Somerset Council has previously been approached over a possible 650 home development located on the north of Nailsea very close to the Woodland Trust's Towerhouse Wood – see attached plan). Towerhouse Wood is designated Ancient Semi Natutral Woodland.</p> <p>Ancient woodland is defined as an irreplaceable natural resource that has remained constantly wooded since AD1600. The length at which ancient woodland takes to develop and evolve (centuries, even millennia), coupled with the vital links it creates between plants, animals and soils accentuate its irreplaceable status. The varied and unique habitats ancient woodland sites provide for many of the UK's most important and threatened fauna and flora species cannot be re-created and cannot afford to be lost. As such, the Woodland Trust aims to prevent the damage, fragmentation and loss of these finite irreplaceable sites from any form of disruptive development.</p> <p>National Planning Policy Framework, paragraph 118, states that "planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss."</p> <p>Natural England's standing advice for Ancient Woodland and Veteran Trees, paragraph 4.8.1 states: "Ancient woodland is of prime ecological and landscape importance, providing a vital part of a rich and diverse countryside. In particular, ancient woodland:</p> <ul style="list-style-type: none"> • is exceptionally rich in wildlife, and supports many rare and threatened species; • may contain surviving descendants and features from the original natural forests;

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			<ul style="list-style-type: none"> • acts as reservoirs from which wildlife can spread into new woodlands; • has valuable soils due to their undisturbed nature; • is an integral part of England’s historic landscapes and the biological and visual functioning of a landscape; • contains a wealth of features of historical and archaeological importance little altered by modern cultivation or disturbance; • contributes to people’s sense of place and imagination.” <p>Even though the proposed development in this area does not directly abut Towerhouse Wood, it could still cause loss and damage to the site’s ancient woodland. Development outside of the actual woodland site can have damaging impacts on woodland wildlife populations. Intensity of land use adjacent to ancient woodland results in an increase in external impacts, also known as edge effects. Detrimental edge effects have been shown to penetrate woodland causing changes in ancient woodland characteristics that extend up to three times the canopy height in from the forest edges.</p> <p>The Woodland Trust is particularly concerned about the following impacts:</p> <ul style="list-style-type: none"> • Fragmentation and degradation of the surrounding natural environment as a result of the separation of adjacent semi-natural habitats, such as small wooded areas, hedgerows, individual trees and wetland habitats; • Intensification of the recreational activity of humans and their pets cause disturbance to the habitats of breeding birds, vegetation damage and path erosion, litter, and fire damage; • Large amounts of disturbance occurring from adjacent development, during both construction and operational phases, including noise, light and traffic; • Pollution occurring from adjacent infrastructure particularly during construction phases, including dust and other waste materials; • Development may aid the colonisation of non-native plant species; <p>In particular, the likely increased useage of the wood from the occupants of 600 new houses nearby will significantly increase the Woodland Trust’s management liability for this relatively small woodland which may struggle to absorb extra visitor pressure – path erosion, increased litter, vandalism etc. We would expect any planning consent granted to require an ‘endowment</p>

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			<p>sum' as a developer obligation (section 106 agreement or CIL) that can be used to mitigate the extra pressures on the wood – eg upgraded secure visitor entrances, path improvement etc. We would also like to see provision for creation of additional publicly accessible green space nearby in the wider locality to help alleviate visitor pressure on Towerhouse Wood and other vulnerable locally accessible green spaces.</p>
Gill Brown	-	3332705//1	<p>As a resident of Nailsea I do not believe that major development in any greenfield site around the town is either desirable or sustainable.</p> <p>I fully support North Somerset Council's decision not to review the Greenbelt around Nailsea.</p> <p>Nailsea Town Council's policy to press for realignment of the Greenbelt, to permit development of the land North of Nailsea between the settlement boundary and the Land Yeo, was made with no consultation. There are many members of the community who value the land highly for its landscape and ecological value and their views were not taken into account. The area is of huge benefit to the health and well being of those who walk there, or visit Jacklands Fishing Lakes nearby, and enjoy the unspoilt natural beauty of the valley on a regular basis. The business at the fishing lakes would be severely affected by development there.</p> <p>I am aware that Land Value Associates made a representation in response to the Site Allocations Plan March 2016 proposing the land North of Nailsea as a suitable site for development, quoting Nailsea Town Council's stated policy in support of their proposal. The existing road network is already under pressure. Traffic from the 600 dwellings proposed by Land Value Associates in their concept plan would exacerbate problems already experienced on the B3130 at Tickenham and Wraxall. The northern bypass, which Nailsea Town Council aspires to, would do nothing to reduce local congestion, and would certainly not compensate for the extra traffic generated by such a development.</p> <p>Finally, although this area is not in the flood plain, development would lead to increased runoff into the Land Yeo. This would be likely to cause problems with diffuse pollution in the SSSI downstream and exacerbate flooding in other areas.</p>

Report run at 15 Feb 2017 17:12:00. Total records: 465.