

Yatton Neighbourhood Development Plan

The below table represents the full responses to the Yatton Neighbourhood Plan submission consultation. Where lengthy additional material has been supplied this has been included in the last column.

1. Responses from consultation: Jan – Feb 2018

Respondent	Plan reference	Comment	Full Response document if appropriate
Forward and introduction			
Richard Croucher		In light of the finds of Roman burial site at Northend I feel that all development at that end of the village be stopped and the sight should be preserved as a historical landmark.	
Mrs Monahan - PACT		One of the designated areas for house-building was playing fields. (Behind the Yatton Rugby Club). The Council should have the power to buy this sort of land themselves to protect it. This is completely contrary to North Somerset's published goal of improving green spaces in our communities. A second designated area is near the access to the Strawberry Line and will affect bird and animal life in the area.	
Oliver Matthews	General	In its current form our view is that the Plan is unsound both in policy content and technicality. Critically the Plan fails to meet the primary objectives of a Neighbourhood Plan as set out within Government Guidance. In doing so the proposal fails to plan sustainably and proactively for the future housing needs of the settlement and wider market area. The Plan is contrary to the supportive and permissive policy context set out by NPPF principally para 47.	
North Somerset Council		The foreword states that the plan looks ahead to 2036.while the front cover states that the plan period is from 2017 to 2026. As the strategic planning policies for 2036 have yet to be approved then this is	

		unacceptable to NSC. The Joint Spatial Plan and new NSC Local Plan which both will plan to 2036 have yet to progress to examination stage. It is suggested that the foreword makes it clear that the plan looks ahead to 2026 (end date of NSC's Core Strategy) and that it will need reviewing once the strategic policies up to 2036 have been adopted.	
North Somerset Council	Page 4-1 st para	This would be the right place to formally state that the YNP does not seek to change any of the site allocations in NSC's Site Allocation Plan (SAP)	
North Somerset Council	Figure 3- Yatton Settlement Boundary	Plan needs a source (NSC Site Allocation Plan). Would also be useful if there was a note stating that the YNP is not amending the settlement boundary and this will be reviewed by NSC as part of the emerging Local Plan which looks ahead to 2036.	
North Somerset Council	Figure 4- Green Belt, LNR etc	Plan needs a source. Location of Local Nature Reserve not clear.	
North Somerset Council	Figure 5- development sites in the SAP	Plan needs a source (NSC Site Allocation Plan). Would also be useful if there was a note stating that the YNP is not amending/ deleting any of these sites.	
About Yatton			
Mrs Monahan - PACT		More housing will need larger green areas for children to have the freedom to exercise and to learn about their environment. The Strawberry Line area is a valuable outdoor classroom. Too much development will give the village an urban aspect that is not in keeping with its history.	
North Somerset Council	Page 10 and 11	Might be useful to include some statistics from the 2011 census e.g. population, journey to work etc. See http://www.n-somerset.gov.uk/wp-content/uploads/2015/11/parish-census-profiles.pdf These will be for the parish rather than the YDP area.	
Summary of objectives			

Win Lowman – Yatton and Congresbury Wildlife Action Group		I support the Yatton Neighbourhood Plan. I would not support a bypass for Yatton - it would only lead to more houses.	
Summary of policies			
Richard Croucher		The map showing local green spaces does not include Hangstones playing field or the sports field near the top of Mendip Road or the Yatton allotment site. This seems to be a big error. These sites need adding as local green spaces.	
North Somerset Council	Figure 6 – Policy Map	Surely the “new bicycle path” will also be a footpath?	
Business policies			
North Somerset Council	BP1	Plan needs to make it clear what development proposals need to contribute. Presume it is those within or close to central part of the village. If so this needs to be made clear. Wording of policy would improve by including the word “the” before “clear” in first sentence. Written justification needs to explain how the distinctiveness is going to be defined and agreed upon. Design guide?	
Juley Howard	BP2	I think that the policy about the area between Clive's and the end of Well Lane, although I think that it is important to focus road safety efforts in this area. I think that a permanent road safety group has to be set up to review progress in this area. It isn't just a perception that the roads are dangerous, two vulnerable people have been killed in the past 11 years between the Methodist Church and Clive's. This issue must be a priority, signs must be put up warning motorists that this an accident black spot. There is a high concentration of elderly and disabled people living in this area and there should be some appropriate signs funded by the Parish Council and put up in a timely	

		manner. This area has to be a 20 mph zone - this is a more congested and dangerous area than the entrances to the schools which already have this in place.	
Richard Croucher		The part of the high street marked as defining the central part of the village is not big enough. It should extend to include the village butcher, the entrance to the church, the railway station and the market inn and the rugby club as a minimum. It would be better if it extended from Cadbury House Hotel to North End.	
Congresbury Parish Council		Congresbury Parish Council is in favour with the business policies and objectives especially with regard to promoting and enhancing Pages Court area both supporting local businesses and providing a 'village centre' that residents and visitors can relate to and travel to by different means including sustainable options. Congresbury residents use Yatton for access to shops and services including the supermarket, vet and dental services and other businesses that are not available in Congresbury. Having safe routes and adequate car and bicycle parking will increase the use of the area for local users. Any improvements that increase the safety of pedestrians and cyclists are welcomed.	
Housing Policies			
Oliver Matthews	Housing General	<p>The Plan fails to recognise that the Local Plan housing allocations and housing targets which have been under substantial scrutiny given the LPA's historic under delivery of an up to date housing supply and are in any event minimum housing targets. Notwithstanding that these targets have been failed to be met at an Authority level the housing agenda from Government is extremely positive and supportive – this is not maintained through the Neighbourhood Plan.</p> <p>Rectory Farm objects in the strongest terms to the content of the Plan, its failure to consider any form of sustainable development outside of the settlement boundary and its unsustainable approach to housing growth.</p>	

		The Plan should be updated immediately to respond to the housing needs of the community based on factual empirical evidence and not that of a nimby consensus which has been led by a bias and incomplete Neighbourhood Plan forum.	
Pegasus Group (on behalf of Yatton RFC)	Housing general	Yatton Rugby Club has a need, driven in part by the club's success and by the growing constraints it has to its operations, to consider moving to a new purpose-built facility. The Club has identified a preferred bidder and is working with them on the viability to bring forward residential development on their existing site to enable them potentially to move to a site to the west of Ham Farm. We consider that there is logical justification for the Neighbourhood Plan to support such a goal and at present there is a distinct lack of commentary within the Plan regarding the club and its ambitions. We therefore question whether there has been sufficient consultation and engagement with the Club on this point.	 Adobe Acrobat Document
Paul Davis, Strategic Land Director, Persimmon Homes Severn Valley	Housing general	Housing objective 1 is <i>'to promote and maintain a mixed housing stock that includes affordable homes so that future generations can choose to stay in Yatton'</i> . However the four housing policies do not implement and achieve this objective. They include the identification of a strategic gap and a detailed policy on SUDS. Policy HP3 relates only to affordable housing and does not promote <i>'a mixed housing stock'</i> and the only positive policy is to <i>'designate'</i> a single small brownfield site for housing, but with no assessment of whether this is sufficient to meet housing needs. This limited approach appears to reflect the preamble to the housing policies and particularly the fourth paragraph which suggests that all housing is considered unsuitable by the majority of residents, which is clearly	 Yatton Neighbourhood De'

		<p>at odds with Housing Objective 1, and the apparent finding of the consultation exercise that <u>only 16%</u> wanted no more houses at all.</p>	
Oliver Matthews	HO1	<p>Housing Objective HO 1 of the Neighbourhood Plan fails to follow Government's clear guidance as to the role and purpose of Neighbourhood Planning.</p> <p>"Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area." Housing Minister August 2017 Paragraph: 001 Reference ID: 41-001-20140306</p> <p>The purpose of a Neighbourhood Plan is for the community to plan for a sustainable future. The Plan should ensure the <u>right types of development</u> are planned for and not that <u>no development</u> is planned for. A settlement the size of Yatton 7,552 (2011 Census) which has a mainline station, supermarket, cafes, banking facilities, library, parish hall, employment and school must recognise its role, status and responsibility in supporting the increasing amount of available housing to support a growing population and ensuring the affordability of housing to future generations.</p> <p>A single brownfield allocation of circa 26 dwellings in Yatton within the whole plan period as the only planned and supported development allocations is totally unsustainable, inappropriate and irresponsible. This is 0.03% growth over the Plan period which is quite clearly inadequate for a settlement of this site.</p> <p>A growth level of circa 10 – 15% would appear more sustainable and in line with national population projections.</p>	

		<p>At the heart of the proposed Yatton Plan is a nimby ethos which pays little to no regard to the highly sustainable settlement status of Yatton, services and hierarchy that Yatton enjoys including infrastructure links directly to Bristol, WSM, Taunton and Exeter via a main line railway station.</p> <p>Neighbourhood planning provides the opportunity for communities to set out a positive vision for how they want their community to develop over the next 10, 15, 20 years in ways that meet identified local need and make sense for local people. They can put in place planning policies that will help deliver that vision or grant planning permission for the development they want to see. The failure to identify future housing growth to support its growing population and community completely undermines one of the primary purposes of the Neighbourhood Plan.</p> <p>The purpose of the Plan is not for an older nimby generation of existing home owners to stagnate the housing market making it inaccessible and unaffordable to future generations.</p> <p>Land outside of the flood zone, outside of environmental or landscape designation around Yatton is finite and this Plan seeks to overlook and omit sustainable sites that could offer vital new housing and community infrastructure.</p> <p>Rectory Farm has itself been the subject of pre-application consultation with North Somerset DC Planners, Ward Members and Parish Council. It sits outside of any environmental or landscape designation and abuts the settlement boundary. It is accessible from an adopted highway of sufficient capacity and width to serve a development. All statutory stakeholders consulted to date have been positive about the prospect of development for approximately 100 dwellings and the sustainability of the site.</p> <p>The Plan fails to recognise, consider or allocate any new development sites outside or abutting the development boundary which may offer not</p>	
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		<p>only new housing, but social housing, section 106 and CIL contributions, public open space and other benefits.</p> <p>The Plan fails to meet its regulatory requirements. Neighbourhood Plan regs requires a forum comprising a minimum of 21 members. The document fails to identify this minimum requirement. It also fails to recognise the resignation of a number of its members through the stages of its preparation. It is understood that these resignations came about as a consequence of the panel's resilient and uncompromising nimby stance and view to new development.</p> <p>A settlement the size of Yatton, 7500 (Census 2011) which includes core services such as supermarket, library, school, railway station, pubs etc the total quantum of development over a plan period of one site comprising 28 dwellings is much too small. Further the Plan does not recognise the emergence of the new Local Plan which is already being prepared. Clarity is sought as to the status of the Neighbourhood Plan following the new Local Plan's adoption.</p> <p>The single proposed development within the confines of the settlement boundary are all brownfield. By its nature it is technically difficult and costly to develop and is unlikely to be viable without substantial reductions to affordable housing and other financial contributions. This therefore diminishes the socio economic benefits that a Greenfield development would otherwise provide. Indeed there is little certainty that it can or will ever be developed – national and local planning policy is already supportive of such sites being developed and yet this site has not been developed to date.</p>	
<p>Mr Barry Smith Sustainable Places Team Leader Environment</p>	<p>HO2</p>	<p>We generally welcome the objectives and policies set out in the document. It is good to see that the community are keen to safeguard their environment and minimize the risk of flooding created by new development.</p> <p>Housing Objective HO 2 – This should ensure it looks to safeguard both existing and proposed housing</p>	

Agency			
Pegasus Group (on behalf of Yatton RFC)	HP1	Policies H1 Strategic Gap.Is not supported by credible technical evidence, both run contrary to the North Somerset Core Strategy and as a result there must either be further work on the background evidence or both policies should be deleted. Failure to do so we consider will result in the Neighbourhood Plan failing to meet Basic Conditions d) and e) of paragraph 8 of Schedule 4b to the Town and Country Planning Act 1990 (as amended	
Paul Davis, Strategic Land Director, Persimmon Homes Severn Valley	HP1	We note that the YNDP proposes to designate a strategic gap north of Yatton but there is no evidence or justification to support this designation. In policy terms in North Somerset the principle of strategic gaps is established by Core Strategy Policy CS19 and detailed boundaries for the identified strategic gaps are defined in the Site Allocations Plan under Policy SA9 and shown on the proposals map. We accept that the Core Strategy recognises that the list of identified strategic gaps is not exhaustive and other areas might be designated through more detailed planning policy documents. However, any additional areas should be subject to the same assessment and based on the same evidence as those strategic gaps identified in the Core Strategy and Site Allocations Plan. It is insufficient to rely on simply quoting Core Strategy Policy CS19 in the Basic Conditions Statement as justification for designating an additional strategic gap. There needs to be clear evidence to demonstrate there is a coalescence issue between Yatton and Kenn and if so then to justify the detailed boundaries of the proposed strategic gap, particularly as North End and Kingston Seymour do not have defined settlement boundaries.	
Juley Howard	HP1	I think that the strategic gap at North End should include all of the fields to the left and right of the B3133 from Kenn Moor Road, past the Arnold's Way roundabout to the turn off for Kingston Bridge. I think that this is an important entrance to the village and gives a feel of the rural nature of the settlement. There should definitely be no more housing	

		overlooking the entrance to Yatton coming across the moors from the direction of Claverham Drove towards Kenn Moor Road. This is an important moorland landscape. The North Somerset Moors are too small to be subject to any more intrusive building.	
Congresbury Parish Council	HP1	<p>Congresbury Parish Council is in support of the proposed Strategic Gap designated to the north of Yatton in order to maintain the identities of the separate villages of Yatton, Kenn and Kingston Seymour.</p> <p>There is currently a gap designated between Yatton and Congresbury and the Parish Council is in favour as villages should be able to keep their own unique identities rather than many local villages being morphed into one another by a series of housing developments.</p>	
North Somerset Council	HP1	<p>The Strategic Gap extends to the northern boundary of the parish and therefore is incomplete without any proposals coming forward in the neighbouring parish. This is clear evidence that the policy is “strategic in nature and should not be included within a Neighbourhood Plan. However if the “gap” is to be retained then there should be a test of harm. Policy would benefit from more detailed wording on what could be permitted. Suggest the policy wording of Policy SA9 of the emerging Site Allocation Plan which states that :</p> <p>Development within strategic gaps as shown on the Policies map will only be permitted where:</p> <ul style="list-style-type: none"> • the open or undeveloped character of the gap would not be significantly adversely affected ; • the separate identity and character of the settlements would not be harmed; and • the landscape setting of the settlements would not be harmed. 	
Faith Moulin	HP1	I support the policy HP1 providing a strategic gap at the north end of the village.	
Mr Barry Smith	HP2	Housing Policy HP 2 – We would recommend that any redevelopment of this site includes appropriate flood resilience measures.	

Sustainable Places Team Leader Environment Agency			
Paul Davis, Strategic Land Director, Persimmon Homes Severn Valley	HP2	<p>Policy HP2 designates the former Titan Ladders site off Mendip Road for housing. This should be deleted for the following reasons.</p> <p>NPPG paragraph 41-044 says '<i>a Neighbourhood Plan can allocate additional sites to those in a Local Plan where this is supported by evidence to demonstrate need above that identified in the Local Plan.</i>' However, there is no evidence base to support the identification of the HP2 site. There is no assessment of need above that identified in the Local Plan or of local housing need in Yatton. Equally, there is no assessment of the suitability of the site for housing. The only justification is in the Basic Conditions Statement that says it supports Core Strategy Policy CS14 by identifying a brown field site within the settlement boundary, not abutting it as stated within the plan. Notwithstanding the recent planning permissions in Yatton, whether identifying a single brown field site for an unspecified number of houses as required by NPPF paragraph 76 and NPPG37-007 has not been assessed and nor has there been any other analysis or evidence produced of housing needs in Yatton.</p> <p>Secondly, in an event, there is a current outstanding full planning application on the land (reference 17/P/2377/F) submitted in October 2017 to demolish the existing buildings and erect 39 dwellings with associated vehicular access improvements, parking, hard/soft landscape works and drainage. Therefore it is not necessary to identify the site in the YNDP because it is coming forward in any event.</p>	

Anna Curvan	HP2	<p>Having carefully read the Neighbourhood Plan. I agree with it but have concerns about the housing on Titan Ladders land. The planning proposal at present puts too many houses on the site and there will be the danger of flooding not only on to the Moors but also into the gardens in Lodge Close where the land is lower than the Titan Ladder land. No-one has been around the Close to see the heights of the land from both sides from the aspects of the gardens, especially at the bottom of the Close which would leave the new houses being much higher than the Lodge Close houses.</p>	
Lucy Brown	HP2	<p>I live adjacent to this area, in Marsh Road, and on the whole welcome the abovementioned site being developed as it is currently an 'eyesore' and a magnet for local teenagers to hang about, but I do have concerns about the following:-</p> <ul style="list-style-type: none"> - The present electrical infrastructure is not adequate to support the current demand and this is before the proposed development. We currently have electrical power dips in the electrical supply daily (flickering lights etc) and an average of at least 1 power cut per month. What improvements to the electrical infrastructure are being put in place to improve this as adding an additional 30-40 houses will put additional strain on this infrastructure? - When developing this site, please can parking spaces be reviewed carefully and included in the approved plans. The existing roads adjacent to this site already have parking constraints. Therefore, there is no room for additional cars to overflow into these roads, should the site be packed with houses with little parking allocation. I understand that the money is in the houses for the developers rather than parking, but this is a valid problem. We have already seen the negative impact of lack of parking due to the changes in building use 	

		and new development on the High Street with the old Prince of Orange change/development.	
Paul Davis, Strategic Land Director, Persimmon Homes Severn Valley	HP3	<p>The policy seeks to restrict <u>any</u> affordable housing as rented housing association accommodation or be part of a shared ownership scheme. Firstly, this approach is contrary to national guidance and specifically the definition of affordable housing in the NPPF, which includes:</p> <ul style="list-style-type: none"> - Social rented housing; - Affordable rentable housing; <p>Intermediate housing including homes for sale and rent provided at a cost above social rent but below market levels including shared equity and other low cost homes for sale and intermediate rent</p> <p>The policy should refer to '<i>affordable housing as defined in National Policy and Guidance</i>' which would allow for changes in the national definition, particularly as a revised NPPG is expected in 2018.</p> <p>Secondly, the reference to '<i>rented housing association accommodation</i>' is also contrary to the NPPF definition and it should be amended to refer to '<i>other registered providers</i>' as provision of affordable housing is not restricted to Housing Associations.</p> <p>Thirdly, the Basic Conditions Statement justifies the YNDP policy approach on the basis of adopted Core Strategy Policies CS15 and CS16. However these policies are correctly based on the definition of affordable housing in the NPPF, which is referred to in Core Strategy paragraph 3.216. So both these policies support mixed and balanced communities. Using the words of the policy itself rather than an abridged quotation from the supporting paragraph, Policy CS15 seeks '<i>a well integrated mix of housing types and tenures to support a range of household sizes, ages and incomes to meet identified housing</i></p>	

		<i>needs'</i> and also seeks to reduce a proliferation of one housing type within an area.	
North Somerset Council	HP3	Any rented properties could be bought by the tenant under the right-to-buy/acquire, in which case the proceeds would be used to create another rented Affordable Housing unit. However depending on who the Landlord/Registered Provider is, they are under no obligation to replace the unit in the same location. The wording of this policy is unacceptable to NSC.	
Pegasus Group (on behalf of Yatton RFC)	HP3	H3 Affordable Housing policy is not supported by credible technical evidence, both run contrary to the North Somerset Core Strategy and as a result there must either be further work on the background evidence or both policies should be deleted. Failure to do so we consider will result in the Neighbourhood Plan failing to meet Basic Conditions d) and e) of paragraph 8 of Schedule 4b to the Town and Country Planning Act 1990 (as amended	
Mr Barry Smith Sustainable Places Team Leader Environment Agency	HP4	HP 4 – there should be a presumption against any surface water system requiring a pumped discharge. This is not sustainable and will inevitably lead to failures at some point in the future. SuDS systems should be incorporated for all development if ground conditions are suitable. New development including roads should avoid flood risk areas and any adverse impact on statutorily protected sites.	
Paul Davis, Strategic Land Director, Persimmon Homes	HP4	Policy HP4 is unclear for the following reasons: 1. The first sentence says the policy applies to minor development schemes but subsequent sentences say it refers to schemes with more than 9 dwellings and also larger than minor developments.	

Severn Valley		<ol style="list-style-type: none"> 2. The last sentence applies to outline applications but does not provide advice on full applications. 3. Whilst it may be appropriate to '<i>discourage</i>' pumped schemes for surface water drainage, there is no evidence to support them not being acceptable on schemes of more than 9 dwellings in Yatton. It is usual for drainage schemes to be adopted under Section 38 of the Highways Act 1980 or Section 104 of the Water Industry Act 1991 and therefore the YNDP policy requirement for long-term maintenance for the '<i>lifetime of a development</i>' is unnecessary. 4. The documents required in the last sentence are standard requirements which do not need to be set out in a formal policy (but could be included as advice in supporting paragraphs). 5. Overall the policy is unnecessary because delivery of flood management infrastructure is adequately covered in Sites and Policies Plan Part 1 Development Management Policies Policy DM70 and we note this policy is not referred to the Basic Conditions Statement. 	
Richard Croucher		Regarding more houses in the village. For every new house that is built it should be demonstrated that one new job has been created within a 10 mile radius. Yatton should not become just another dormitory village.	
North Somerset Council	HP4	<p>There are several points the Council would raise with this policy, and some issues the Plan needs to include or consider, besides concentrating on pumping.</p> <ul style="list-style-type: none"> • NSC would agree that Sustainable Drainage should be encouraged for minor developments as any reduction in surface runoff is to be encouraged particularly with Climate Change influences on the capacity of existing systems 	

		<ul style="list-style-type: none"> • The YNP should include more the evidence for requiring SuDS and pumping etc. – for example source control at a property level will reduce runoff and within the village..... • NSC agree pumped schemes should be discouraged, however in Yatton some schemes already exist, but only in very minor areas of Yatton for example Wemberham Lane and along that edge of the village in places (Horsecastle The Batch). This is due to the very flat nature of the catchment on that side of the village, and there is merit in any large developments in that area considering alternative methods of drainage concentrating on reduction on site before pumping is considered. In other areas pumping should not be required and therefore designs should be sustainable drainage • Management of the pumping stations is an issue for NSC if Wessex Water do not take them on. Therefore for major developments NSC ask for contingency arrangements to be provided and for the maintenance manual, to give a risk assessment. • Infiltration NSC work to the BRE 365 (revised 2016) standard, (this is a nationally accepted industry standard) and with infiltration we ask for groundwater monitoring over several seasons on major developments, as the areas on the out skirts or edges of Yatton are susceptible to ‘water logging’ in winter, due to ground conditions. I would suggest the policy covers both infiltration tests and groundwater concerns • Part c. is not really viable as water has a natural flow downstream and it has been established that a sequential system of rights to discharge is allowed - ‘The owner of land has a natural right to collect and discharge the surface water runoff from their land onto adjoining lower land even where they have created and increase in flow by an improved system of drainage or by other means’. (this is actually case law from 1897) If however improvement works to allow flow were required on third party land then the works would require land owner agreement. 	
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Environment Policies			
Mr Barry Smith Sustainable Places Team Leader Environment Agency		<p>Environmental Objectives</p> <p>We welcome the reference to the need to retain a buffer between new development and existing 'sensitive' areas. It is important that wildlife corridors are maintained to allow movement of wildlife. It should be noted that this desire is not covered by the objectives or the policies.</p>	
Amanda Grundy - Natural England		<p>Yatton Neighbourhood Plan appears to be a well-researched and generally positive document that reflects local aspirations for the area and accords with other policies.</p> <p>Yatton Parish contains two Sites of Special Scientific Interest (SSSI), several Sites of Nature Conservation Interest, a local nature reserve and a range of undesignated but valued habitats and landscape features, some of which are known to provide foraging and commuting opportunities for greater and lesser horseshoe bats. These species are associated with North Somerset & Mendip Bat Special Area of Conservation (SAC).</p> <p>The recognition of the natural environment and the importance placed on its protection is well reflected throughout the Yatton Neighbourhood Plan and is particularly welcome.</p>	
Ian Lings -	EO1	The Woodland Trust is pleased to see that your summary of objectives acknowledges the environment as the second one being taken into	

Woodland Trust		<p>account, and this will help shape its future as a Service Village until 2036. Yatton carries Local Green Space status, and this is also being taken into account with your Plan, so that development should not harm the local distinctive landscape.</p> <p>Trees are some of the most important features of your area for local people. This is being acknowledged with the North Somerset Core Strategy (2017), which resists development resulting in the loss of woodland hedgerows and trees, and Policy CS4 (Nature Conservation) which seeks to protect ancient woodland and veteran trees, whilst also promoting native tree planting and woodland creation, and Policy CS9 (Green infrastructure) which protects trees and also the planting of trees in woodlands and urban areas. Therefore, this should also be taken into account with the objectives in the Neighbourhood Plan for Yatton.</p> <p>Therefore, your Environmental objectives EO1 (b) should seek to protect and enhance its character of Yatton, and be amended to include the following:</p> <p>‘Valued landscapes including ancient woodland, veteran trees hedgerows and trees.’</p>	
Faith Moulin	EO2	Environment Objectives - EO2 is not an environmental objective. Increased access to the countryside is not compatible with wildlife protection.	
Faith Moulin	EP1	EP1 is not an environment policy	
Paul Davis, Strategic Land Director,	EP2	Proposed Allocation of Local Green Space at the Orchard at The Grange off Kenn Moor Road	

<p>Persimmon Homes Severn Valley</p>		<p>Firstly the policy says '<i>Local Green Space will be proposed for the areas listed</i>' so it is an intention to allocate Local Green Space rather than a specific allocation. Equally, there is then no explanation of how Local Green Space will be formally allocated following submission of the YNDP.</p> <p>Secondly the YNDP contains no submitted evidence to support the allocation of any of the Local Green Spaces</p>	
<p>Ian Lings Woodland Trust</p>	<p>EP2</p>	<p>We are pleased to see that the Policy EP2 is about conserving the landscape, so that any proposals do not harm the local landscape, and how the planting of appropriate indigenous trees should also be taken into account with new development proposals.</p> <p>However, your Plan for Yatton should also seek to support conserving and enhancing woodland and trees, such as Oak trees, with management, and to plant more trees in appropriate locations. Increasing the amount of trees and woods in Yatton will provide enhanced green infrastructure for your local communities, and also mitigate against the future loss of trees to disease (eg Ash dieback), with a new generation of trees both in woods and also outside woods in streets, hedgerows and amenity sites.</p> <p>Information can be found here: http://www.magic.gov.uk/MagicMap.asp and http://www.ancient-tree-hunt.org.uk/discoveries/interactivemap/</p> <p>Ancient woodland would benefit from strengthened protection building on the National Planning Policy Forum (NPPF). Therefore, we would recommend that the Environment section of your Neighbourhood Plan should include something along these lines:</p>	

“Substantial harm to or loss of irreplaceable habitats such as ancient woodland, should be wholly exceptional”.

The Woodland Trust would suggest that your Neighbourhood Plan is more specific about ancient woodland protection. For example, the introduction and background to the consultation on the Kimbolton Neighbourhood Development Plan (2017), identified the importance of ancient woodland, and how it should be protected and enhanced. Also, we would like to see buffering distances set out. For example, for most types of development (i.e. residential), a planted buffer strip of 50m would be preferred to protect the core of the woodland. Standing Advice from Natural England and the Forestry Commission has some useful information:

<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

Whilst the profile and Vision for your Neighbourhood Plan identifies the need to retain and enhance Yatton and its rural character as small rural settlement, and also the need for development to integrate with the landscape. Given that Neighbourhood Plans are a great opportunity to think about how trees can also enhance your community and the lives of its residents, the natural environment and tree and woodland conservation in Yatton, should also be taken into account as a Strategic Objective in your Plan.

Therefore, we would like to see the importance of trees and woodland recognised for providing healthy living and recreation also being taken into account with your Neighbourhood Plan for Yatton. In an era of ever increasing concern about the nation’s physical and mental health, the Woodland Trust strongly believes that trees and woodland can play a key role in delivering improved health & wellbeing at a local level. Whilst, at the same time, the Health & Social Care Act 2012 has

		<p>passed much of the responsibility for health & wellbeing to upper-tier and unitary local authorities, and this is reinforced by the Care Act 2014. Also, each new house being built in your parish should require a new street tree, and also car parks must have trees within them.</p>	
<p>Ian Lings - Woodland Trust</p>	<p>EP2</p>	<p>Whilst your Neighbourhood Plan does seek to retain and enhance recreational and Local Green Spaces and provide special protection for green areas of particular importance so as to resist the loss of open space, whilst also ensuring the provision of some more, to what extent there is considered to be enough accessible space in your community also needs to be taken into account. There are Natural England and Forestry Commission standards which can be used with developers on this:</p> <p>The Woodland Access Standard aspires:</p> <ul style="list-style-type: none"> • That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size. • That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes. <p>The Woodland Trust also believes that trees and woodlands can deliver a major contribution to resolving a range of water management issues, particularly those resulting from climate change, like flooding and the water quality implications caused by extreme weather events. This is important in the area covered by your Neighbourhood Plan because trees offer opportunities to make positive water use change, whilst also contributing to other objectives, such as biodiversity, timber & green infrastructure</p>	

Judith Cockram	EP2	There is another green space not mentioned in the Neighbourhood Plan which I feel should be included. It is in Kenn Moor Road behind the Market Industrial Estate	
North Somerset Council	EP2	Policy is worded so that no development at all will be permissible. There should be a test of harm. This test could relate to the character and setting of the LGS.	
Juley Howard	EP2	I think that when you refer to the small play area at the end of Stowey Road that you actually mean Barberry Farm Road? This area is used by children who live on the High Street, etc and access it from Barberry Farm Road.	
Judith Cockram		The Conservation area should be extended up to the old Prince Of Orange pub. This would include more important buildings and is a pinch point for traffic which needs to be dealt with in some way to make it safer.	
Tony Moulin	EP3	The Conditions Statement states that EP3 would address CS4 requirements solely through increasing wooded areas. This would be a laudable aim however, no areas have been identified. There is generally no reference to Cadbury Hill the largest wooded area in the Plan area. The most significant contribution to biodiversity would be to maintain the existing green corridors (riparian, hedge and treelined habitats) between the open countryside and current settlement boundaries used as flyways by bats and providing connectivity for many other species. The protection of these areas of landscape is most significant and should be mentioned as such in relation to the Environmental and HRA assessment. The absence of recognition of the contribution to biodiversity in these areas could become problematic should planning policy require a review of settlement boundaries.	
Faith Moulin	EP3	EP3 states that new developments 'must' incorporate amenity areas for planting with appropriate indigenous trees. I do not believe this is	

		<p>practicable. Developers and council alike do not wish to have more tree planting - or green spaces dotted about - in new developments as it incurs cost. More mention in the document could be made of the benefits of trees - health and wellbeing - and the importance of street trees. Should the recommendation be quantified? x houses = x trees?</p>	
Tony Moulin	EP4	<p>The “Dark Skies” policy is also very important to biodiversity particularly the protection of foraging bat flyways from light sources and should be cross referenced</p>	
Faith Moulin		<p>The overview re natural history makes no mention of Cadbury Hill Local Nature Reserve which is a huge omission. It focuses instead only on the wetland SSSIs. Water vole has not been found in recent times</p>	
Faith Moulin		<p>I would have liked to see reference to existing hedges and trees. When hedges are left, what frequently happens when new residents arrive is that they pull out the hedges that were left in place by developers. I would like to see a policy that encouraged the retention of farm hedges, the encouragement to farmers not to flail hedges annually (best practice is every three years) because Yatton is within the SAC for bats.</p> <p>Reference should be made to the new Supplementary Guidance for Bats. The importance of the agricultural landscape cannot be overstated.</p> <p>I do not know if mitigation for development is within the scope of a Neighbourhood Plan but clearly if development goes ahead on land formerly grazed it should be mitigated for elsewhere with other grazing land for bats.</p>	
Richard Croucher		<p>100% support the idea of extending the cycle path along the old railway track to Clevedon.</p>	

Congresbury Parish Council		<p>Congresbury Parish Council is in favour of the proposed green spaces especially the gang Wall which is also on the Parish of Congresbury.</p> <p>Also, any improvements to footpaths will benefit neighbouring parishes to improve links and encourage sustainable travel and recreational activities.</p>	
Mrs Monahan - PACT		<p>New developments will need green spaces as these are vital to a healthy environment. The current provision in Yatton is not high and will be under increasing pressure with a rising population.</p>	
Transport			
Mrs Jeanne Craske	General	<p>In summary, I see the Transport Section of the Yatton Neighbourhood Plan as a missed opportunity and in my view, it should be re-drafted to incorporate realistic policies for the improved safety and wellbeing of Yatton residents and visitors. I would have expected to find a better thought-out plan for making the High Street safer in the short to medium term. A weight limit through the village and reduced, monitored speed limits would be a good start. In the long term, clearly a by-pass around Yatton and Congresbury is necessary and, with more housing developments being approved in Yatton, now is surely the time to put in place measures to gain funding from the developers and work towards bringing a by-pass to fruition.</p>	
Mrs Jeanne Craske	TO1	<p>As a grandmother who takes her grandson to Yatton Infant School and back each week I have always been concerned about the dangerous state of Yatton High Street and I was hoping to find, within the proposed Yatton Neighbourhood Plan, some sensible suggestions to improve the safety of this road for pedestrians. Sadly, there are none.</p> <p>Section TO1 begins well by giving some powerful statistics about the extent of the problems and residents' views on them, eg 'Our consultation with local residents showed that 77% of them are concerned about traffic congestion.'</p>	

	<p>'There are a large number of HGV movements through the village...The peak rates were more than one HGV per minute at both sites (ie north and south ends.) Residents are very concerned about this issue, with 81% of them citing it as an important negative influence on their quality of life.'</p> <p>'Concerns about high levels of traffic led a large number of residents (70%) to say that they would like to see a bypass around the village, from the south end of Arnold's Way to the A370 west of Congresbury.'</p> <p>Unfortunately I believe the remainder of the section and its policies to be what in common parlance would be known as a 'cop out'. As an aside, the sentence about a bypass potentially having a negative impact on traffic volumes in Yatton north of the railway line and in Congresbury seems to me to be completely ambiguous. Surely Congresbury would benefit enormously from having Yatton traffic diverted along a bypass, which to me would be a positive impact and surely now is the time, with more housing developments in the pipeline in Yatton, to campaign to make this happen?</p> <p>It is recognised within Section TO1 that increased car use, as a result of dangerous pedestrian and cycling access, is causing increases in levels of air and noise pollution and aren't these the very issues that North Somerset Council has recognised it is time to address?</p> <p>A great amount of detail is given about the width of the pavements along the High Street as compared with recognised Government guidelines, but without any bypass to the village it is in my view unrealistic to suggest that pavements can be widened when this would, in places, result in sections of single carriageway.</p> <p>I have, on many occasions, witnessed dangerous situations on Yatton High Street, usually involving heavy goods vehicles driving too fast and</p>	
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		trying to squeeze past each other, putting pedestrians at risk of being hit by wing mirrors or, worse still, being hit by a lorry mounting the pavement. In most areas of Bristol there is nowadays a monitored mandatory speed limit of 20mph and it is simply unsatisfactory to continue to simply use on-street parking as a means of traffic calming on this narrow and over-used through route.	
Faith Moulin	TP1	I support the transport section of the document. TP1 and TP2 would mark an important improvement in attitudes to the High Street in Yatton	
Faith Moulin	TP2	I support the transport section of the document. TP1 and TP2 would mark an important improvement in attitudes to the High Street in Yatton	
Mrs Jeanne Craske	TP1-3	Transport Policies TP1-3 seem to me to be somewhat lacking in substance and ineffectual. A village by-pass is clearly needed and was, I can only assume from the 'road to nowhere' at Yatton North End (Arnold's Way), at one time proposed. Such a by-pass would have massive benefits for both Yatton and Congresbury.	
A Pitman	TP3	Para TP3 refers to the aim of "reducing delay" to traffic in Yatton High St. and then in para.TP3(b)(a) refers to making use of "on street parking as a traffic calming measure". If you calm traffic you cause delay, you can't do both.	
James Cumming		I strongly support traffic calming measures in Yatton. A 20mph speed limit through the village seems the minimum we should expect, along with widening pavements at the Butchers Arms and other bottlenecks. If traffic has to be single lane (and light controlled) to enable this then so be it. I do not understand why the relatively small investment to impose a 20mph limit has not already been made. I do not support the construction of a bypass as I believe this will lead to fill in development and even higher rates of housebuilding on the outskirts of the village, turning Yatton into a dormitory town.	

		It is imperative that healthcare and school capacity is increased to meet the extra demands caused by new housebuilding at the same time as that development, not after. At the moment, the capacity in the doctors surgery does not seem to have increased to match the larger population.	
Richard Croucher		Regarding public transport. There needs to be regular reliable bus service to Clevedon. Regarding the rail link to Bristol and beyond it should be noted that GWR are replacing the 8 coach inter city's with new 5 coach trains making commuting even more uncomfortable. Developers profiting from building new homes in North Somerset should be made to make a contribution to get more regular trains to Bristol and beyond.	
Richard Croucher		Regarding transport policies. Totally against any idea of a bypass. Totally against the number of HGVs using the high street. The lorries coming out of Arnold's Way should be made to head north and use the motorway. We need wider pavements through the village and the kind of traffic calming that was put into Portishead high street a few years ago. This should include a new raised crossing by the newsagents. Existing crossings should be raised. Mini roundabouts at the junction of Heathgate and a High Street, also junction of Well Lane and High Street. Move south the driving entrance to the Co Op car park to put another mini roundabout including the junction with Chescombe Road. South of the junction of B3133 and Mendip Road remove the traffic islands so that the gap in the pavement opposite the Hotel entrance can be filled making it possible to walk from Mendip Road to the sight of the proposed new health centre without crossing the B3133 twice. 20 mph limit through the whole village with cameras to enforce this. May need to make parts of Mendip Road and Stowey Road one way or put in speed ramps to prevent them becoming alternatives to the High a Street.	

Congresbury Parish Council		Congresbury Parish Council supports the transport policies as any improvements that mitigate the impact of through traffic would have a positive impact on the traffic in Congresbury and would improve the safety of residents and visitors using the B3133.	
Ms W Griggs		The Yatton Neighbourhood plan is a document based on thorough research and much community consultation. It is an excellent document and the proposals will certainly benefit the community in the future.	
Phil Carter		<p>I decided not to move to Yatton, because of the dreadful traffic problems. Yatton is one of the few times ever where I have experienced road rage directed at me. As someone, who does not live in Yatton, you need to know how the traffic problems affect people looking to move to Yatton. The Plan has some nice ideas around traffic (e.g. cycle paths), but it is very much "moving around the deckchairs on the Titanic". New housing development will only make this worse and discourage more people from moving to Yatton.</p> <p>I believe the answer lies in significantly more strategic action, namely a) a Yatton bypass, to improve community living in the village and to set a new boundary to its development and b) further afield, a new dual carriageway from the M5 Clevedon junction through to the Long Ashton bypass, to relieve Yatton further and other North Somerset communities. Unless this strategic, long term approach to transport is taken, Yatton will increasingly be a difficult place to live.</p>	
Network Rail		<p><u>Level Crossings</u></p> <p>Westmead Ryhne is a Public Rights of Way level crossing which has a line speed of 100mph with 136 trains per day travelling along this section of the railway. Any development of land which would result in a material increase or significant change in the character of traffic using a rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be</p>	

		<p>compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.</p> <p>Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned by the impact the proposed site allocation would have on the safety and operation of these level crossings. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.</p> <p>Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none">• By a proposal being directly next to a level crossing• By the cumulative effect of development added over time• By the type of crossing involved• By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing• By developments that might impede pedestrians ability to hear approaching trains• By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs• By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing. <p>It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings</p>	
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		<p>not to increase risk as could be the case with an increase in usage at the three level crossings in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.</p> <p>The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:- <i>Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010) to requires that ... where a proposed development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over the railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval".</i></p> <p>We would appreciate the Council's providing Network Rail with an opportunity to comment on any future planning policy documents as we may have more specific comments to make (further to those above). We look forward to continuing to work with you to maintain consistency between local and rail network planning strategy.</p>	
General Omissions			
Gary Parsons (Sport England)		<p>The National Planning Policy Framework (NPPF) published in March 2012 (replacing PPS12 & PPG17) states:</p> <p><i>Paragraph 73 – Access to high quality open spaces and opportunities for sport and recreation can make an important</i></p>	

		<p><i>contribution to health and well-being of communities. Planning policies should be based on up-to-date assessment of the needs for open space, sport and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.</i></p> <p>Sport England's view is that, in order to meet the requirements of the National Planning Policy Framework (NPPF), this should include a strategy (supply and demand analysis with qualitative issues included) covering the need for indoor and outdoor sports facilities, including playing pitches.</p> <p>The Council is working on a Playing Pitch Strategy which includes supply and demand information as well as a look at future demand. It will pick up pitch issues in Yatton.</p> <p>The Council is also working on the production of a Built (sports) Facilities Strategy.</p> <p>Completion/Adoption of the Playing Pitch and Built (sports) Facilities Strategy is required.</p> <p>The completion of this evidence base work is imperative to meet local community and recreational needs and future needs to underpin Local Plan policy and inform new provision to be secured by planning obligations and the Community Infrastructure Levy.</p>	
Gary Parsons		<u>Active Design</u>	 Sport England response.msg

<p>(Sport England)</p>		<p>Sport England along with Public Health England have recently launched our revised guidance 'Active Design' which we consider has considerable synergy the Plan. It may therefore be useful to provide a cross-reference (and perhaps a hyperlink) to www.sportengland.org/activedesign . Sport England believes that being active should be an intrinsic part of everyone's life pattern.</p> <ul style="list-style-type: none"> • The guidance is aimed at planners, urban designers, developers and health professionals. • The guidance looks to support the creation of healthy communities through the land use planning system by encouraging people to be more physically active through their everyday lives. • The guidance builds on the original Active Designs objectives of <i>Improving Accessibility, Enhancing Amenity and Increasing Awareness (the '3A's')</i>, and sets out the Ten Principles of Active Design. • Then Ten Active Design Principles have been developed to inspire and inform the design and layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and physical activity and active lifestyles. • The guide includes a series of case studies that set out practical real-life examples of the Active Design Principles in action. These case studies are set out to inspire and encourage those engaged in the planning, design and management of our environments to deliver more active and healthier environments. • The Ten Active Design Principles are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design. <p>The developer's checklist (Appendix 1) has been revised and can also be accessed via www.sportengland.org/activedesign</p>	
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		<p>Sport England would encourage development in the Neighbourhood Plan area be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the checklist.</p>	
<p>Gary Parsons (Sport England)</p>		<p><u>Yatton RFC</u></p> <p>The site is important to rugby and the club have current issues with a lack of playing pitches for the development of rugby. The junior rugby playing field is subject to a current application for housing. There is an opportunity here in the Neighbourhood Plan to look at the sporting sites in Yatton and to give a steer on protecting sports and playing fields and enabling through an allocation to look at the strategic picture and identify new sites for sport.</p> <p>We would object as a Statutory Consultee on any proposed loss of the playing field without mitigation to meet Sport England policy (E4):</p> <p>“The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development.”</p>	
<p>Jon Bendle (RFU)</p>		<p>The RFU are aware that Yatton Rugby Football Club are currently over capacity, and require additional natural turf pitches to cope with the current demand. With the identified housing growth within the Plan, the RFU recognise that this situation will be exaggerated if permanent pitches cannot be identified and supplied. The temporary junior pitches in use, are not secured and have restrictions on their use.</p>	

Juley Howard		<p>I think that this plan largely ignores the needs of young people. I think that the facilities for them in the village are shambolic.</p> <p>I didn't really have much time to re-read the Plan but I would have thought that the library should become more significant in the life of the village, as a centre for further education.</p>	
Tony Moulin		I wish to support this plan and policies.	
Tony Moulin		The continued expansion of Bristol Airport and its environmental impact on the village has not been considered. In response to the community consultation questionnaire 25.3% of residents scored aircraft noise as the biggest negative impact. The geographical distribution of responses showed a clear pattern towards the east of the village mirroring the flight path of aircraft. Yatton Parish is not currently included as a recipient of environmental mitigation under existing Section 106 agreements. This should therefore be addressed in future planning proposals	
Tony Moulin		<p>The comments under housing policy regarding a Yatton bypass are welcome although reference to this should be in juxta position with transport.</p> <p>Generally a little more narrative to justify and cross reference the Plan policies would be helpful to its presentation.</p>	
Faith Moulin		I feel this document is very brief and needs a bit more descriptive text and more detailed policy and reasons for policy. There is little about transport except the roads. Cycling and walking should be encouraged within the village but no mention is made of the very poor public transport service in Yatton.	

<p>Paul Davis, Strategic Land Director, Persimmon Homes Severn Valley</p>		<p>On the basis these are the only submitted documents, one general comment we have is that there is no evidence base to support the Yatton Neighbourhood Development Plan (YNDP) and its policies. We have commented in more detail against specific policies as appropriate. However, in the absence of any supporting evidence base the YNDP fails to satisfy national guidance on neighbourhood planning and specifically NPPG ID 41-040, which says:</p> <p><i>'Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft Neighbourhood Plan or the proposals in an order.'</i></p> <p><i>Therefore on this basis the YNDP fails to meet Basic Condition 8(2)(a) as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 and as applied to Neighbourhood Plans by Section 38A of the Planning and Compulsory Purchase Act 2004</i></p>	
<p>Trevor Riddle</p>		<p>I agree and support the plan</p>	
<p>Mr Barry Smith Sustainable Places Team Leader Environment Agency</p>		<p>GENERAL COMMENTS:</p> <p>Flood Risk and Drainage</p> <p>Please note that since the 15 April 2015 matters relating to surface water are now dealt with by the Lead Local Flood Authority. This will be the Unitary North Somerset Council), so please consult whichever is the appropriate body on this aspect.</p> <p>Surface water run-off should be controlled as near to its source as</p>	

		<p>possible with sustainable drainage systems (SuDS). This reduces flood risk through the use of soakaways, infiltration trenches, permeable pavements, grassed swales, ponds etc. SuDS can also increase groundwater recharge, improve water quality and provide amenity opportunities. A SuDS approach is encouraged by the Building Regulations.</p> <p>We support the planting of trees within catchments, especially headwaters, to reduce surface water runoff. Therefore, opportunities for increasing the amount of tree planting, in appropriate locations, is considered beneficial.</p> <p>There should also be consideration about the foul drainage network in the area to understand if there may be existing capacity constraints on the system.</p> <p>Biodiversity / Green Space The Neighbourhood plan has acknowledged the need for green spaces to be preserved and enhanced to improve the rich biodiversity of the area. The green spaces should include wetlands or water bodies (e.g. rivers, streams, ditches) as these provide ecological interest and diversity. Opportunities to enhance any wetland feature should be identified and delivered through development, as this approach is promoted in the National Planning Policy Framework and is desired outcome of the Water Framework Directive.</p> <p>We would recommend that Natural England are consulted if any proposed developments may impact on any conservation designations and / or protected species.</p> <p>Contaminated Land The rivers and groundwater should be protected and enhanced to</p>	
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		ensure that the aims and objectives of the Water Framework Directive are met. Any site that may have been contaminated through its former use will need to be factored into the local plan and any redevelopment strategy.	
Consultation			
Juley Howard		The consultation has been flawed - I have been unable to read the Plan until this week as I lent my computer to someone and the library has been shut for weeks. I couldn't actually find an actual Yatton Neighbourhood Plan in the library when I looked on the day I could go in when it was open. The consultation process has been flawed.	
Faith Moulin		The process has been non-inclusive throughout. Consultations in the village were fixed for times and places which were not convenient for most people to attend. The steering group was too small and too exclusive and the responses reflect the lack of engagement with the community. I have had immense difficulty accessing the online consultation as my user ID, passwords, etc. were constantly rejected.	
Responded but no comment			
The Coal Authority			
Housing and Care 21			
Highways England			
Historic England			
National Grid -An assessment has been carried out with respect to National Grids electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grids gas distributions intermediate and high pressure apparatus. National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.			

2. Responses to Consultation on revised Statement of Community Involvement and Basic Conditions Statement October-November 2018

Respondent	Plan Reference	Comment
Natural England		We have reviewed the amended Statement of Consultation and Basic Condition Statement and can confirm we have no further comments to offer.
Persimmon Homes	Statement of Community Involvement	<p>1.1 The revised Statement of Community Involvement says none of the consultation bodies specified in the Neighbourhood Plan (General) Regulations 2012 were consulted. Equally there was no consultation with the development industry. NPPG 41-048 says:</p> <p><i>'Other bodies, landowners and the development industry should be involved in preparing a draft Neighbourhood Plan or Order. By doing this the qualifying bodies will be better placed to produce plans that provide sustainable development which benefits the local community whilst avoiding placing unrealistic pressures on the cost and deliverability of that development.'</i></p> <p>1.2 The SCI sets out the Regulation 14 consultation which took place between February and May 2017. This was after the consultation carried out by PHSV on its planning application at Moor Lane (paragraph 2.9 of our February 2018 comments) so the Neighbourhood Plan Group were fully aware of these proposals, but made no attempt to contact PHSV or involve us in the plan-making process as encouraged in the NPPG. Whilst this might not have resulted in prejudice, as we have responded in full to the submitted plan, it would have been helpful for the Neighbourhood Plan body to have done so, to enable PHSV to explain their proposals and to explore how an element of green space could have been incorporated into the development proposal. This would have avoided the need for formally designating part of the land as Local Green Space and prompting our need to formally object to the Yatton Neighbourhood Development Plan and for the matter to be formally examined.</p> <p>1.3 This position is further exacerbated by two further issues set out in our February 2018 comments. Firstly there is a complete lack of evidence to justify the allocation of any of the land as Local Green Space as explained in paragraphs 3.2 to 3.4 of our February 2018 comments. Secondly our comments in paragraphs 3.17 and 3.18 of the February 2018 comments show that neither the landowners nor PHSV as holders of an interest in the land were contacted at all, quite apart from</p>

		<p>at an early stage about the proposed designation of the land as Local Green Space in the Neighbourhood Plan.</p> <p>1.4 Taken together these two instances of lack of consultation in the preparation of the Neighbourhood Plan together with a Regulation 14 consultation process undertaken entirely within the village with no attempt to involve any external consultees is contrary to national guidance which aims to produce robust Neighbourhood Plans.</p>
Persimmon Homes	Basic Conditions Statement	<p>2.1 We note that in addition to responding to the examiner's request, the Basic Conditions Statement also provides an addition to the comments under Policy HP1. This appears to be an attempt to provide further justification for the strategic gap, but it is an inadequate justification in view of the lack of detailed evidence to support the strategic gap. This is in stark contrast to the detailed evidence produced by North Somerset Council to justify strategic gaps defined in the adopted Site Allocations Plan where if the Yatton Neighbourhood Plan is adopted it will join the Site Allocations Plan as part of the formal development plan. Taken with the lack of evidence to justify the designation of Local Green Space set out above it demonstrates the plan is deficient. NPPG 41-040 says:</p> <p><i>While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.'</i></p> <p>2.2 The Yatton Neighbourhood Plan does not include any evidence to support the designation of a Strategic Gap or Local Green Space.</p> <p>2.3 In addition:</p> <p><i>A local planning authority should share evidence, including that gathered to support its own plan making, with a qualifying body. Further details of the type of evidence supporting a Local Plan'is given in a link.</i></p>

		<p>2.4 In this case the neighbourhood plan includes policies to identify a Strategic Gap and Local Green Space in addition to similar designations in the adopted Site Allocations Plan. Those designations in the Site Allocation were based on a clear evidence base which was accepted by the Inspector in examining the plan. This provides an obvious example of the evidence the neighbourhood plan should produce, in accordance with the guidance in NPPG 41-040 to details of the evidence needed to support a local plan, in the section on neighbourhood plans. As the local planning authority produced that evidence for its own plan, it is clearly relevant for the neighbourhood plan to use the same basis.</p> <p>2.5 If the Yatton Neighbourhood Plan is made, it will join the Site Allocations Plan as part of the development plan for North Somerset, but with no consistency in the evidence base to support identical policy designations. It is therefore contrary to national guidance and fails to meet Basic Condition 8(2)(a). In addition we also consider that as Strategic Gaps and Local Green Space allocations are strategic policies which affect the designation of land for housing so on this issue the Yatton Neighbourhood Plan also fails to meet Basic Condition 8(2)(e).</p>
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