

Submission consultation Claverham Neighbourhood Plan 23 June- 4 August 2017

Report of consultation

The Claverham Neighbourhood Plan was submitted to North Somerset Council for examination on 9 May 2017. [Executive](#) on 20 June accepted that the draft Plan met the necessary criteria to be passed to examination and that the required period of consultation should be undertaken ([see minutes](#)).

North Somerset Council published the draft plan and accompanying documents for consultation 23 June to 4 August 2017 (inclusive).

The following steps were taken to publicise the plan:-

- Direct email to everyone on the Council's Planning Policy data base (approx. 4,800 stakeholders includes parish/town councils, developers, agents, statutory consultees and other consultation bodies)
- Direct email/letter Individuals/organisations highlighted on the previous community consultation on the draft plan undertaken by the qualifying body
- Notice in free colour paper "Yatton and Congresbury Living" distributed early July 2017 to households in the area.
- Notice in alternative free colour paper "Yatton and Congresbury Paper". Distributed late July to remind local people about the consultation (due to low response rate to consultation at that time)
- Posters on parish and community hall notice boards
- Full set of Plan documents at Yatton Parish Council offices, Congresbury Library and Weston-super-Mare library
- Consultation details on councils' website

There were a total of 19 respondents with a low response rate from local people. This prompted an additional article in an alternative local free paper. Reminder emails were also sent to key interested parties w/c Most of the responses were submitted via email and then transferred by officer to the econsult on-line consultation system.

The table below details the responses received. Where the responses which were transferred into econsult were lengthy and/or broken up to insert into different sections of the report then the whole document can be viewed by opening the "attached document" link in the right hand column of the table.

Claverham Neighbourhood Plan submission consultation responses July/August 2017

Document part		Introduction and Background	
Respondent Name	Respondent Organisation	Comment	Attached documents
Ann Gawthorpe		<p>As a member of the committee which produced the plan I know that it reflects the views of the majority of the residents of Claverham. Following extensive consultation through public meetings, surveys and news letters, as well as help from NSC officers, these views have been distilled to form a comprehensive guide to ensuring the long term viability of the village. I hope that the examiner agrees with what has been achieved.</p> <p>Ann Gawthorpe</p>	
C Moore		<p>Having been involved in the production of the Claverham Neighbourhood Plan I believe it is representative of the views of Claverham residents who have been fully involved in its preparation. The Plan aims to retain the rural character of the village whilst allocating a brownfield site for development, a strategy endorsed by residents.</p> <p>I fully support the Plan and hope the examiner is satisfied that all planning requirements are met.</p>	
Cleeve Parish Council	Cleeve Parish Council	I am writing in respect of the above plan, with the views and opinions of Cleeve Parish Council.	

		<p>They would like to advise the following:</p> <ul style="list-style-type: none"> -The plans are supported by the Councillors -They strongly support the strategic gap between Cleve and Claverham as it gives them their identities. - Bishops Road and Claverham Road between Yatton and Cleve (with Claverham on it) has become an extremely busy route and is effectively a cut through. Any growth in housing will only cause this road to become more congested. 	
Coal Authority	The Coal Authority	<p>Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on it. Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.</p>	
D.Hayler		<p>I am writing to contribute to the formal consultation for the Claverham Neighbourhood Plan which has been submitted for examination. I am a resident of Claverham Village, and have closely followed the process and am fully sighted on all the documents submitted. As residents, this plan will directly impacts myself and my family.</p> <p>I believe the plan has taken into account all the views provided during the consultation phase, and has taken all reasonable steps to consider the views expressed. The level and style of consultation has been wholly appropriate, and I believe that this is evidenced by the feedback received and attendances at the public meetings. Further, Claverham Future have taken every</p>	

		<p>opportunity to keep residents up-to-date and published relevant updates on the website as they were available.</p> <p>I am satisfied that there is sufficient evidence to justify the Vision, Objectives and policies it contains. I am further satisfied that the the plan meets all the requirements required by then Basic Conditions Statement. The Plan's accompanying document bundle provides a wealth of supporting evidence.</p> <p>In its current format, the plan protects the character of the village, while supporting the local and National need for development. Any developments beyond that proposed by the plan cannot be justified and would be outside existing policies and guidelines.</p> <p>Whilst commercial property developers may express a different view, the reality is that the plan meets all the required legislation and criteria for being approved by the examiner to go to referendum, and provides appropriate balance between development and protection of the village character.</p> <p>I fully support the plan in its current format.</p>	
Environment Agency	Environment Agency	<p>Thank you for referring the above Neighbourhood Plan, which was received on 23 June 2017.</p> <p>The Environment Agency has no further comments to make in addition to those made at the pre examination stage, dated 26 July 2016, and attached for your information.</p> <p>Please quote the Agency's reference on any future correspondence regarding this matter.</p>	<p>Environment Agency comments 2016.rtf (79 KB)</p> <p>Environment Agency response email.pdf (11 KB)</p> <p>EA response flood</p>

			map.pdf (735 KB)
Highways England	Highways England	<p>Thank you for consulting Highways England on your neighbourhood plan. We manage the motorway and trunk road network in England known as the Strategic Road Network.</p> <p>Given your village location some way from the Strategic Road Network, Smaller development in this locality will likely have a limited impact on our network and we, therefore, have no objections.</p> <p>While acknowledging the challenges of reducing reliance on the personal motor car for work based trips, we note you have policies that seek to protect some safe cycle and pedestrian routes that may in some instances encourage people to access the limited public transport offer in the locality for wider trips.</p> <p>I trust this information is of assistance and please keep us informed as the plan progresses.</p>	
N Cooper	Claverham Future	<p>Dear Examiner,</p> <p>I am writing in full support of the Claverham Neighbourhood Plan (Plan) as drafted and presented. This may be as expected, noting that I am the chairman of Claverham Future, the volunteer group working for Yatton Parish Council and our residents in drafting the Plan, nevertheless I am taking this opportunity to personally confirm some matters.</p> <p>The Plan and supporting documents are the result of matters raised and supported by residents in the Plan area. The Plan strikes a more than fair balance in terms of protecting/improving our environment and community with support for sensitive and controlled development that, with the</p>	

brownfield site PS1, will represent a major proportional and actual increase of the housing stock in our community.

I particularly wish to point out that the physical boundaries of acceptable development land are crucial aspects of what our community is proposing in our Plan and that these should be respected as reasonable constraints if there is any proper or defensible meaning to Sustainable Development. Our community is not well positioned for amenities or employment and our Plan is seeking to properly balance the social and environmental aspects against the limited and short term fiscal benefit which accrues to the national economy of housebuilding. Outside of those generous opportunities identified in our plan, new housing will definitely create more traffic burden with its associated carbon along with consumption of farm land and wildlife habitat and is definitely contrary to the wishes of our residents and counter to any sustainable argument.

Hopefully it is understood and will be retained in the plan that there are truly effective checks and balances that go with development so that our community can also develop the other aspects of our natural and social environment whilst making a proportionally significant contribution to national and local housing.

I trust that our interpretation of Localism and Sustainable Development and our faith in what Neighbourhood Planning can deliver is justified. I further trust that all of the principal aspects of our Neighbourhood Plan are retained and possibly strengthened through the specialist knowledge and assistance of the examination process.

Yours Sincerely

Nigel Cooper

Chair of Claverham Future

<p>National Grid (AMEC)</p>	<p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p> <p>About National Grid</p> <p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p>Specific Comments</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p>Gas Distribution – Low / Medium Pressure</p> <p>Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to</p>	
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Network Rail (L Bullock)	Network Rail	<p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.</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:-</p> <p><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</i></p>	

		<p>road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval".</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) and we trust these comments will be considered in your preparation of the forthcoming Plan documents.</p>	
Portishead Town Council	Portishead Town Council	As per Minute No. 2836 - Portishead Town Council responds - no comment.	
xxx""<>xxx		Testing	
Document part		Planning Context of Claverham NDP	
Respondent Name	Respondent Organisation	Comment	Attached documents
Gladman	Gladman	<p>This letter provides Gladman Developments Ltd (Gladman) representations in response to the submission version of the Claverham Neighbourhood Plan (CNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.</p> <p>Legal Requirements</p> <p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the CNP must meet are as follows:</p>	<p>Gladman response 2017 Claverham Reg 16.pdf (284 KB)</p>

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.
- (d) The making of the order contributes to the achievement of sustainable development.
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.

National Planning Policy Framework and Planning Practice Guidance

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date

evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development. Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an

adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the CNP's ability to meet basic condition (a), (d) and (e) and this will be discussed in greater detail throughout this response.

Relationship to Local Plan

At the time of writing, the current development plan that covers the Claverham Neighbourhood Plan area and the development plan which the CNP will be tested against is the Core Strategy,

adopted April 2012 by North Somerset Council (NSC).

The Council are currently progressing with a Sites and Policies Plan to which the second part the Sites Allocation Plan, allocates sites to deliver the housing requirements of the Core Strategy is currently at examination. At this time, the Inspector has told the Council to find more sites to accommodate another 2500 dwellings to provide flexibility in ensuring the housing requirements of the Core Strategy will be met. As currently presented the CNP will not be supporting the Council in being proactive to help NSC meet this requirement given its negative stance towards accommodating further sustainable growth opportunities.

Due regard should be had to the emerging West of England Joint Spatial Plan to which North Somerset is a joint member working to produce. Through this plan it has emerged that housing and employment requirements will likely increase with North Somerset needing to plan for additional growth than currently set out in the Core Strategy. To ensure the longevity of the CNP and to avoid key aspects of the plan being superseded Gladman suggests the plan is sufficiently flexible towards new development as Section 38(5) of the Planning and Compulsory Purchase Act 2004 states:

‘if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).’

Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>Persimmon Homes regularly respond to and contribute to neighbourhood plans throughout the country. We accept the importance of neighbourhood plans in giving local communities the opportunity to participate in and shape planning policies in their area and we appreciate they are more accessible and understandable than some higher level plans. However, Neighbourhood Development Plans have to meet the Basic Conditions set out in paragraph 8(2) of schedule 4b of the Town and Country Planning Act 1990, as applied to neighbourhood plans by section 38a of the Planning and Compulsory Purchase Act 2004. The neighbourhood plan if made will become part of the statutory development plan for the area and therefore must take into account the overall planning context within which it is being prepared and be presented in a form that meets all the statutory requirements.</p> <p><u>Planning Context</u></p> <p>Whilst the adopted North Somerset Core Strategy provides the appropriate strategic context for the Claverham NDP, the preparation of the Joint Spatial Plan for the West of England, which will inform a review of the Core Strategy in 2018, means the NDP will effectively have a very short shelf life. We also note that in response to the North Somerset Site Allocations Plan Examiner’s initial findings, the Council is testing the provision of additional housing sites for up to 2,500 homes, which whilst not changing the strategic context for the Neighbourhood Development Plan provided by the Core Strategy, could have implications for housing delivery throughout North Somerset. In order to reflect changing circumstances the Claverham NDP should include a commitment to an early review.</p>	<p>Persimmon Claverham Neighbourhood Development Plan.msg.doc (44 KB)</p>
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Document part		7.1 Vision	
Respondent Name	Respondent Organisation	Comment	Attached documents
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	The requirement for zero carbon homes by 2016 and other buildings by 2019 was abandoned by the Government in ' <i>Fixing the Foundations</i> ' in July 2015. Therefore the vision should refer to ' <i>a low carbon footprint</i> ' rather a ' <i>zero carbon footprint</i> .'	
Document part		8. SB1 - Settlement Policy	
Respondent Name	Respondent Organisation	Comment	Attached documents
Gladman	Gladman	This policy is simply repetition of policy CS33 of the Core Strategy which defines the settlement boundary for Claverham. It is considered unnecessary to repeat policies contained in a higher-level plan, as this will already be a consideration for a decision maker when the development plan is read as a whole. In carrying forward what Gladman considers an overly restrictive settlement boundary, this plan will do little to attempt to address what the Parish Council considers to be the 'inherent unsustainability' of Claverham and it is doubtful that the policy will contribute to the achievement of sustainable development.	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	The phrase ' <i>and consequentially the start of countryside</i> ' is unclear, but equally adds nothing to a policy confirming the settlement boundary, so it is unnecessary and should be deleted.	
UTAS Claverham UK		Policy SB1 governs the extent of the settlement boundary for Claverham. Policy SB1 confirms that the settlement boundary defines the acceptable	

		<p>areas for infill development and marks the start of the countryside. It is therefore submitted that given the site is previously developed land and included as a redevelopment site within The Plan, it stands to reason that it too should be included in the defined Settlement Boundary.</p>	
Document part		9. Development Policies	
Respondent Name	Respondent Organisation	Comment	Attached documents
Gladman	Gladman	<p>This section highlights the key issues that Gladman would like to raise with regards to the content of the CNP as currently proposed. It is considered that the plan does not set out a positive vision for the area conflicting with the requirements of national policy and guidance, Gladman have therefore sought to recommend several amendments to ensure the plan is as flexible as possible to ensure the plan will contribute to achieving sustainable development.</p> <p>The plan sets out in great detail why it is considered that Claverham is a ‘predominantly unsustainable’ location for development. This does not accord with the Framework, critically paragraph 16 which states communities engaging in neighbourhood planning should ‘plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan.’</p> <p>Gladman have previously set out why it considers Claverham to be a sustainable location for growth and takes the opportunity to do so again. Claverham is connected to, and forms part of, the Parish of Yatton. NSC acknowledge the sustainability of Yatton in the Settlement Function and Hierarchy Topic paper, which establishes that Yatton contains many of the essential services needed to make a village sustainable, including a pub, community hall, village shop, primary school, GP surgery, post office, youth centre, library, dentist, opticians, bank, train station etc.</p> <p>As identified in Section 4 of the CNP, Claverham is host to a range of its own facilities such as a primary school, village hall, post office, café, a pizza outlet and a hair salon. Accordingly, it has the benefit of its own services and facilities and access to a range of other services in the neighbouring</p>	

settlement of Yatton.

Taking account of the need to deliver housing to meet the national policy imperative which seeks to ‘significantly boost the supply of housing’, Claverham has taken little growth over recent decades because of considerable planning policy restraints and persistent under-delivery of much needed housing. Claverham currently finds itself in a ‘sustainability trap’ where: ‘Smaller and rural communities [are considered] as unsustainable in principle. Local authorities are now increasingly defining settlement hierarchies as a basis for determining the permissible scale and nature of sustainable development. However, few if any have devised any means by which a settlement at a lower level can migrate up the sustainability ladder. This all results in a ‘sustainability trap’. In essence, otherwise beneficial development can only be approved if the settlement is considered sustainable in the first place.’ ‘Living Working Countryside: The Taylor Review of Rural Economy and Affordable Housing’

2008 http://www.wensumalliance.org.uk/publications/Taylor_Review_Livingworkingcountryside.pdf

It is considered that this plan is not currently attempting to address, the Parish Councils own, sustainability concerns and instead using this as a way to restrict sustainable development from coming forward. If the plan is not positive the situation is unlikely to change whereas a proactive approach to growth could in fact bolster Claverham and support for its services.

Conclusions

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the CNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not comply with basic condition (a), (d) and (e). The plan does not conform with national policy and guidance and in seeking to reallocate an employment site undermines the strategic policies of the Core Strategy.

Gladman believe the plan should not be approved for referendum as the level of modifications

		necessary for the plan to meet the basic conditions would mean that the plan would be considerably different to the plan that was put forward for examination. Gladman formally request to participate at the hearing session(s) should the Examiner decide it necessary to discuss these issues in a public forum. Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	The paragraph which says ‘ <i>Site Allocation Policy SA6 requires that redevelopment proposals of employment sites such as PS1 for non-economic (ie non-employment uses) should demonstrate that continuation in employment uses would not be viable</i> ’ should be deleted as Site Allocations Plan Policy SA6 is being reviewed, along with all the employment policies in the Site Allocations Plan, as recommended by the Inspector in her initial findings.	
UTAS Claverham UK		<p>UTAS Claverham UK hereby make Written Representations to amend the Claverham Neighbourhood Plan to alter some of the proposed designations for the subject site and to include it within the Settlement Boundary.</p> <p>Whilst it is acknowledged that the site is allocated within The Plan as a redevelopment site under reference PS1 (a notion supported by UTAS), it is submitted that Policy D3 is too prescriptive and unnecessarily replicates policies that are already included in the Development Plan and the NPPF, potentially unacceptably hampering redevelopment opportunities to the extent that the best use of previously developed land cannot be achieved. There also appears to be no valid reason not to include the site within the defined Settlement Boundary.</p>	
Document part		9.1 D1 - New Development General	
Respondent Name	Respondent Organisation	Comment	Attached documents
Gladman	Gladman	Gladman object to the wording of this policy as it is not setting out a positive approach for the plan. Stating that Claverham is inherently unsustainable is a negative viewpoint and as detailed earlier restricting development would never help to fix this problem. In taking this opportunity to supporting a scheme instead of restricting the plan could	

		<p>help to boost the sustainability of Claverham and encourage services in to the area that the Parish Council currently consider to be lacking.</p> <p>It is not considered appropriate to state that all small major and large major developments will be restricted. Gladman suggest a much more flexible approach towards new development where schemes are considered on their own merits with schemes which would help to resolve the ‘inherent unsustainability’ of Claverham supported. A failure to plan positively will result the settlement stagnating and never escaping the ‘sustainability trap’ Claverham finds itself in.</p>	
Document part		9.3 D3 - Redevelopment of Site PS1	
Respondent Name	Respondent Organisation	Comment	Attached documents
Amy Shepherd, SCC		<p>The County Council Acoustics Specialist would suggest any changes in the use of employment land (possibly to noise sensitive uses) may also need to consider potential conflicts it may have with adjoining employment land use due to the associated expectations for amenity within the new development. Such conflict could otherwise constrain existing or potential commercial development opportunities of the remaining employment land.</p> <p>The County Council Acoustics Specialist would suggest that the comment within section 9.3 - D3 might identify new advice contained within ProPG Professional Practice Guidance on Planning & Noise - New Residential Development as this provides a simple way to address any potential noise conflicts that might arise with the construction of new homes near to existing commercial development by requiring appropriate design measures to be incorporated in new housing.</p>	

Gladman	Gladman	<p>This policy is seeking to reallocate an employment site for housing once the current owners and occupiers of the site vacate the premises, should a viable alternative employment use for the site not be found. Seeking to redevelop an employment site within the neighbourhood area could be seen to undermine strategic policy CS20 of the adopted Core Strategy. Policy CS20 seeks to provide at least 10,100 additional employment opportunities with priority given to the reuse of previously developed land and the safeguarding of sites in existing economic use. It is unclear how reallocating a current employment site would help NSC in achieving this objective.</p> <p>Further, it is currently unknown whether a viable alternative for employment use will be found nor whether a housebuilder would be willing to promote this site for residential development, should this be the case. Due to this uncertainty, Gladman recommends that this is modified to be a community aspiration rather a land use policy within the CNP.</p> <p>Notwithstanding this, if the Council wish to proceed with the allocation of this site Gladman submit that the due process for site allocation has not been undertaken. Gladman have seen no evidence of any site assessment work being undertaken and the considerations of the sustainability of the site nor any consideration of any reasonable alternatives. It is not enough to simply say there are no other alternative sites without undertaking a formal assessment. PPG states that when allocating sites for development a qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria.</p> <p>In seeking to allocate a site for housing development this contradicts the Parish Council's own opinion that the settlement of Claverham is 'inherently unsustainable' with the Parish Council's comments</p>	
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		<p>regarding this contained throughout the CNP, if this was truly the case this policy would be supporting development in an ‘unsustainable’ location. Gladman considers that this policy does not accord with basic conditions (a), (d) and (e) and should be modified to become a community aspiration rather than a land use policy within the plan.</p>	
Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	<p>The penultimate paragraph on page 20 says that if site PS1 is shown to be unviable for employment uses, mixed use or residential use will be supported. However, Policy D3 makes it clear, based on the evidence base for the neighbourhood plan that site PS1 is identified in the plan for mixed use or residential development and therefore it is unnecessary for the proposed development so identified to be subject to a subsequent post allocation/pre planning application viability appraisal to demonstrate the previous employment use is not viable. The allocation of the site through the making of the NDP already establishes that, which is entirely in accordance with the test in NPPF paragraph 22, which says <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.’</i></p> <p>The only viability issue which might arise would be at the detailed planning application stage, if either technical issues, such as ground conditions, or CIL/Section 106 requirements impact on viability.</p> <p>There is conflict between figures 3 and 4. Figure 4 shows site PS1 as a potential development site, which is consistent with figures 7 and 8, but figure 3 identifies it as an <i>‘employment zone’</i>. Figure 3 should be amended.</p>	

<p>Persimmon Homes Severn Valley</p>	<p>Persimmon Homes Severn Valley</p>	<p>Part 3 requires all trees, hedging, walls and ponds to be preserved, protected and maintained. This is a very high and restrictive policy test and we suggest the following changes to the policy:</p> <p>Replace ‘<i>all</i>’ with ‘<i>where appropriate</i>’; Delete ‘preserved’ which has a particular meaning in planning terms related to historic and listed buildings and not general features such as these; Add an additional clause to enable the replacement of such features where necessary, as included the Neighbourhood Plan Policy ENV3. Part 5 of the policy ‘<i>supports</i>’ development, which lacks clarity and as it if is the intention of the plan to ‘<i>allocate</i>’ this site, it should be specific and say so. We support the intention of the policy to support/allocate mixed <u>or</u>residential use on the site. This flexibility is important, because whilst there may be merit in achieving a mixed employment/residential scheme this may not be deliverable and it is then important that the alternative of residential use on the whole is established as being acceptable within the Neighbourhood Plan. As a policy document, it is important that the NDP establishes the appropriate land uses on the site in principle, but is sufficiently flexible to enable delivery through appropriate planning conditions in the event that employment uses are not deliverable/viable. As set out above the viability test in the policy is not necessary and should be deleted.</p> <p>The note in the third box on page 25 needs to be amended. In accordance with the format of the rest of the plan, the first sentence which sets out the NDP objectives the policy supports, is appropriate. However, the reference to the Backwell Farleigh Fields inquiry is not relevant and should be deleted (and in any event a decision on that appeal is awaited). The reference to the Ministerial</p>	
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		Statement of December 2016 on land supply does not support the policy and should also be deleted, but if it is retained the full provisions of the statement should be included.	
UTAS Claverham UK		<p>We take this opportunity to submit Written Representations in relation to the draft Claverham Future – Claverham Neighbourhood Plan – Submission Consultation (8 May 2017) on behalf of Claverham Ltd., a UTC Aerospace Systems Company (“UTAS Claverham UK”).</p> <p>UTAS Claverham UK is the freehold owner of the land shown in the enclosed title plans. This includes;</p> <ul style="list-style-type: none"> - The Commercial Aerospace Works (the main site), - The Claverham Village Hall, - The field to the North of the main site, - The field to the South of the main site. <p>The latter is currently identified in the consultation version of the Site and Policies Plan as a “grass area adjacent to Claverham village hall used for May Day celebrations” of 0.63 ha. Whilst it is recognised that the land has been used, on occasion, for the May Day celebrations, it is highlighted that the land is in private ownership and is not generally available for public use. The land forms part of the operational complex of the landowners and is used for, amongst other things, a congregation space during emergency situations or training drills.</p> <p>In the main, these Written Representations relate to the Commercial Aerospace Works (herein the ‘main site’) and follow previous Written Representations submitted in December 2016 for this site in</p>	<p>UTAS Neighbourhood Plan Reps Aug 2017 Final.pdf (561 KB)</p>

	<p>respect of the emerging Sites and Policies Plan. These Representations will draw on the contents of the most up to date consultation version of the Claverham Neighbourhood Plan.</p> <p>Site</p> <p>The whole of the landowners' demise comprises approximately 5.75 ha of land and 9,114sqm of existing buildings that include a grade II former house (currently offices and chapel), as well as further purpose built warehouse/commercial buildings.</p> <p>To the north of the main site is a field that was purchased by the owners but is undeveloped. To the south of the main site is an area of fenced open space as well as Claverham Village Hall, the latter subject to a 999 year lease to Yatton Parish Council.</p> <p>The site is bounded by residential dwellings to the west, the main road through Claverham to the south and open fields to the east and north.</p> <p>The site is outside the Green Belt, which is found immediately to the east. The site abuts the Claverham Settlement Boundary.</p> <p>Comments on the Draft Neighbourhood Plan</p> <p>The land forming the main site at UTAS Claverham UK is identified with the Neighbourhood Plan (herein 'The Plan') as a potential development site for a residential led development, on the assumption that the existing employment use is shown to be unviable. This redevelopment is to be governed by Policy D3 of The Plan and the site is included under reference PS1. It is submitted, however, that in the most part, Policy D3 is overly prescriptive and/or covers material planning matters that would be otherwise addressed through adopted Development Plan policies. Accordingly, a review of Policy D3, and other relevant policies and sections of The Plan, is set out below.</p> <p>Policy D3</p> <p>Policy D3 (1) suggest that all trees, hedging, walls and ponds shall</p>	
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be preserved, protected and maintained. To this end, The Plan proposes a Protected Site Boundary Zone over the green boundaries of site PS1 to protect the important wildlife corridors and habitats used by various species, including bats. It is submitted that this designation is premature and protection of the existing value features is acknowledged but should be proportional. For example, it is entirely feasible that the boundary can serve the same purpose if reduced in width, assuming wildlife corridors and visual impact of a future redevelopment are shown to be acceptable with appropriate mitigation. The LPA has recently applied woodland and individual TPOs across the site boundary areas. The owners have now raised an objection to this TPO on the basis that in places it fails the required tests for protection. The LPA will review the objection in due course as they decide whether or not to confirm the TPO. Consequently it is submitted that the Protected Site Boundary Zone is overstated and an unnecessary inclusion in The Plan.

Policy D3 (2) requires access and parking to be maintained for the Claverham Village Hall. This is subject to a legal agreement and is not a material planning consideration. It is not, therefore, appropriate to include this as a criterion of Policy D3.

Policy D3 (3) seeks to govern the site's heritage assets. The protection of heritage assets at the site will be adequately controlled through the pertinent existing Development Plan Policies and the NPPF, and it is therefore unnecessary to include this criterion.

Policy D3 (4) seeks to control light levels emitted by any new development at the site through the implementation of standards within 'Table 2 Environmental Zone E2 within Guidance Notes for the Reduction of Obtrusive Light GN01:2011'. This is not a statutory document or one adopted as a Supplementary Planning Document or Guidance Note. It is therefore beyond the scope of the Neighbourhood Plan to include reference to a document that appears

potentially unregulated with no foundation in the Development Plan. The light emission of any future redevelopment proposals could be adequately controlled by adopted Development Plan policies on this matter.

Policy D3 (5) explains that the site is suitable for mixed or residential use assuming it is shown to be non-viable for employment. It is agreed that this part of Policy D3 is appropriate. Section 9.3 of the plan provides the preamble to Policy D3. Within the second paragraph of Section 9.3, an appraisal of the existing parking demand has been undertaken with trip movement calculations based on aerial photography; this then being considered equivalent to 75 dwellings in term of car movements. This calculation is not sufficiently accurate to make this conclusion and is misleading without proper use of industry standard TRICS data, and needs to be based on the quantum of use allowable under the lawful use, and not quantum under the last known use as staff numbers were reducing. This calculation should therefore either be updated to reflect the industry standard calculations or removed from The Plan. The site is yet to be designated in the site allocation plan, but you will be aware that a call for site's process is now underway and the UTAS Claverham UK site will be put forward as a housing site. Section 9.3 of the plan provides the preamble to Policy D3. Within the second paragraph of Section 9.3, an appraisal of the existing parking demand has been undertaken with trip movement calculations based on aerial photography; this then being considered equivalent to 75 dwellings in term of car movements. This calculation is not sufficiently accurate to make this conclusion and is misleading without proper use of industry standard TRICS data, and needs to be based on the quantum of use allowable under the lawful use, and not quantum under the last known use as staff numbers were reducing. This calculation should therefore either be updated to

		<p>reflect the industry standard calculations or removed from The Plan. The site is yet to be designated in the site allocation plan, but you will be aware that a call for site's process is now underway and the UTAS Claverham UK site will be put forward as a housing site. It has been mentioned above that it is the owners view that the Protected Site Boundary Zone should be removed and any future planning application for redevelopment be dealt with on its own merits. This should therefore be represented in Figure 7 & 8.</p>	
Document part		9.5 EMP1 - Local Employment	
Respondent Name	Respondent Organisation	Comment	Attached documents
Amy Shepherd, SCC		The County Council Acoustics Specialist would suggest any changes in the use of employment land (possibly to noise sensitive uses) may also need to consider potential conflicts it may have with adjoining employment land use due to the associated expectations for amenity within the new development. Such conflict could otherwise constrain existing or potential commercial development opportunities of the remaining employment land. This point might also apply to policy D3.	
Portishead Town Council	Portishead Town Council	As per Minute No. 2836 - Portishead Town Council responds - no comment.	
Document part		10.2 T2 - Highway Safety	
Respondent Name	Respondent Organisation	Comment	Attached documents

Persimmon Homes Severn Valley	Persimmon Homes Severn Valley	Policy T2 is unclear in its intention to ‘ <i>minimise traffic movements</i> ’. The NDP does not set out any measures to achieve this policy requirement or demonstrate how it will be assessed. Neither is it clear what is meant by ‘ <i>not compromise use of roads or lanes for recreation.</i> ’	
Document part		11.3 CF2 Community Facility – Broadcroft Play Area	
Respondent Name	Respondent Organisation	Comment	Attached documents
Sport England	Sport England	<p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Planning Policy Statement: ‘A Sporting Future for the Playing Fields of England’.</p> <p>http://www.sportengland.org/playingfieldspolicy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development</p>	

and implementation of planning policy is the evidence base on which it is founded.

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

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

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

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

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

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

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

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

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

		<p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign <i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p>	
Document part		12.2 ENV2 – Historic Environment	
Respondent Name	Respondent Organisation	Comment	Attached documents
Gladman	Gladman	<p>This policy is overly restrictive and needs modifying to include the flexibility of the Framework when considering the impact of a development on Locally Important Buildings (non-designated heritage assets). Gladman suggests wording is added to the policy to reflect paragraph 135 and the application of applying a balanced judgement when considering any scale of harm or loss and the significance of the heritage asset.</p>	
Historic England (David Stuart)	Historic England	<p>Thank you for your Regulation 16 consultation on the Claverham Neighbourhood Plan.</p> <p>We have no comments that we wish to make on the Plan other than to positively note the amendment to policy D3 to now read the <u>retention</u>of Listed Buildings as previously advised in our response to the SEA Screening consultation from your authority.</p> <p>I attach previous correspondence for information.</p>	<p>Historic England Claverham neighbourhood Plan submission consultations.msg (193 KB)</p>

Document part		12.4 ENV4 – Local Green Space	
Respondent Name	Respondent Organisation	Comment	Attached documents
Portishead Town Council	Portishead Town Council	As per Minute No. 2836 - Portishead Town Council responds - no comment.	
UTAS Claverham UK		<p>The Local Green Space designation across the field to the south of PS1 is premature. This designation is subject to review by the Inspector as part of the examination of the Sites and Policies Plan Part 2. The landowners submitted written and verbal representations against the designation of the land as Open Green Space on the basis it failed the tests of Paragraph 77 of the NPPF as it is not demonstrably 'special' to the local community, particularly as it has always been in private ownership. The Local Green Space designation should therefore be removed from Figure 7 & 8 until such a time that it is confirmed or not in the Site and Policies Plan Part 2.</p> <p>Policy ENV4 governs the inclusion of Local Green Space within the Neighbourhood Plan. Within this Policy, the land to the south of site PS1 is designated as Local Green Space under reference LGS1. For the reasons stated above (<i>relating to site PS1</i>) this designation should be removed from Policy ENV4.</p>	

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