
Portishead Neighbourhood Plan (Regulation 16 Consultation)

Report on all representations received to the submission consultation

Plan section		What is a Neighbourhood Plan?	
Respondent Name	Organisation	Comment	Attachments
PaulPeru		<p>A high quality document, which is exactly the Plan that Portishead needs</p> <p>Good to see the linkage to the United Nations sustainability goals. Objectives and underpinning Policies reflect the needs of the Town</p>	
Ian	Mr	<p>I am supportive of this Plan hope it is put into place.</p>	
Mal		<p>The single biggest issue for Portishead both for environmental and community is to address the appalling transport system for travel to and from Bristol. Transport services have significantly reduced in the last 2 years with the previous X3 bus service for the Village Quarter to Bristol being affected by cancellation and inconvenient re-routing. This has led to significantly increased journey times.</p> <p>To support the community a functioning environmental friendly transport system is imperative, the non fulfilled promises over the last 15 years or so for reinstating the Portishead/Bristol railway line is so disappointing on so many levels.</p>	
Coal Authority	The Coal Authority	<p>Thank you for consulting The Coal Authority on the above.</p> <p>Having reviewed your document, I confirm that we have no specific comments to make on it.</p>	<p>Coal Authority Response 27-10-2022.pdf</p>

Plan section		Why prepare a Neighbourhood Plan for Portishead?	
Respondent Name	Organisation	Comment	Attachments
Jones15		All green belt must be protected. if development is required should be on brown field sites. particular importance in areas around weston big wood	
Janetd	portishead tc councillor	This plan should help Portishead residents plan for the future of their town, particularly restricting unwanted building. The town has already trebled in size in the last 20 years with no additional infrastructure.	
Martin Powell		<p>There is absolutely no point in ordinary citizens commenting on plans any more. The local people are always ignored and the local government is unable to do anything as targets for housing are set nationally and decided by Planning Inspectors, who also act as advisers to big developers.</p> <p>Farleigh Fields in Backwell was rejected at every level, including by the Secretary of State, was universally rejected by hundreds of local people. Yet, it is being built because one planning inspector from Cheshire gave it the go ahead. Portishead will get whatever some planning inspector says it should get so everyone is wasting their time on this exercise until the system is reformed</p>	MArtin Powell_Redacted.pdf
Persimmon Homes Severn Valley	Persimmon Homes	While the Neighbourhood Plan can be formed in accordance with the strategic policies of North Somerset Council, the fact that these policies have been found to be out of date would suggest the intention of forming the Neighbourhood Plan in accordance with these policies is ill founded. Core Strategy Policy CS14, which allocates the distribution of new housing over the plan period, was found to be out of date at appeal with reference APP/D0121/W/21/3285343. Para 66 of the draft Neighbourhood Plan states that strategic policies of the Local Plan should not be retested at a Neighbourhood Plan level, unless "there has been a significant change in circumstances that affect the requirement". Given that the strategic policies have been found to be out of date, this would likely qualify as "a significant change in circumstances that affect the requirement" and therefore the	Persimmon Homes Severn Valley.pdf

Respondent Name	Organisation	Comment	Attachments
		<p>Neighbourhood Plan cannot rely on them.</p> <p>The draft Neighbourhood Plan states it will be reviewed on the adoption of the emerging Local Plan. This would appear to be an unnecessary use of funds and resources of the NP Steering Group and Town Council in the first place to produce a Neighbourhood Plan that will be out of date as soon as it is adopted and requires review shortly after.</p> <p>Unhelpfully, the current draft Neighbourhood Plan largely functions as a repetition of policies from the Neighbourhood Plan and North Somerset Council's Core Strategy. While the Neighbourhood Planning Group intended to produce a Neighbourhood Plan to guide and inform future developments, in its current form the Neighbourhood Plan's ability to do so is limited by the fact it regularly repeats adopted policies that proposals will already need to consider. In para 1.29, the draft Neighbourhood Plan says that the revisions to be made based on the adoption of the emerging Local Plan will only be minor, with changes to policy references. If the Neighbourhood Plan only exists to repeat adopted policy, then it is not an effective document.</p> <p>Whilst the Government supports the preparation of Neighbourhood Plans they must be effective and purposeful. The draft Neighbourhood Plan reads more as a town promotional document as opposed to a plan which will form part of the statutory development plan. However, its preparation timing is somewhat at odds to the draft Local Plan which it should complement. In the absence of a clear planning strategy for North Somerset -it is in our view, premature to prepare a Neighbourhood Plan which itself would be eclipsed by the Local Plan upon its adoption. The Neighbourhood Plan's lifespan will therefore be clipped - and its relevance and effectiveness will diminish accordingly.</p> <p>It is therefore sensible to follow and align with the emerging Local Plan rather than seek to expedite the Neighbourhood Plan at pace without better synchronicity.</p> <p>Paragraph 1.25 of the Neighbourhood Plan advises that "Neighbourhood Plans cannot be used to prevent development; they cannot say no to more houses when there is a national and regional shortage of housing'. To be clear, that also relates to local shortages - meaning district-wide - and this should be recognised in the wording of the Neighbourhood Plan.</p>	

Respondent Name	Organisation	Comment	Attachments
		Paragraph 1.28 advises that the Neighbourhood Plan is to be future-proofed given that the plan is drafted against the adopted development plan though, it suggests, in parallel with the emerging Local Plan. Given, at this time that North Somerset Council has still not agreed a definitive locational strategy for development across the district nor defined robustly its housing need figures going forward (set against a significant shortfall in its 5 Year Housing Land Supply - well documented in recent appeals) then this is further evidence supporting concerns over its premature preparation. At this time in the draft Neighbourhood Plan's preparation, the NOP Steering Group should consider the implications of all of this going forward.	

Plan section	How has the Neighbourhood Plan been prepared and how does it represent community views?
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Respondent Name	Organisation	Comment	Attachments
Susan B		As consultations have only been conducted online and digitally, are you not missing the views of a significant portion of the community?	
Janetd	portishead tc councillor	I am aware that this was produced jointly by many interested residents and the Town Council. Many views were taken into account, and there was much consultation.	
Janetd	portishead tc councillor	Much consultation has taken place, and the plan reflects the views of the residents.	
Persimmon Homes Severn Valley	Persimmon Homes	The Neighbourhood Plan has been through previous consultations summarised in the draft Neighbourhood Plan. However, the summary is not accurate and somewhat misleading, in particular the summary of responses to the Local	Persimmon Homes Severn Vally PTC email

Respondent Name	Organisation	Comment	Attachments
		<p>Green Space designations.</p> <p>Persimmon Homes Severn Valley can confirm that it has received no formal correspondence to date from the qualifying body stating the intent to include LGS26 in the draft Neighbourhood Plan - which is unfortunate. Importantly, it also conflicts with the PPG on Local Green Spaces.</p> <p>As the situation is somewhat confusing we unravel it here: LGS26 as per the current consultation draft did not exist in the Regulation 14 draft from Spring 2022. The Local Green Space Report which supports the policy, summarised in the Neighbourhood Plan, is disingenuous as it gives the impression that the public were consulted on LGS26 as the land at the Sheepway Roundabout, when LGS26 in the Regulation 14 draft was Black Nore Lighthouse Green Space (which is now listed as LGS25 in the current draft Plan). This land now designated as LGS26 in the current draft was not referred to in any form in terms of a Local Green Space designation in the previous drafts.</p> <p>The "Summary of revisions made to PEN6 as a result of Regulation 14 Consultation" in the Consultation Statement sets out the amendments to PEN6, but fails to mention the change in LGS26. This cannot be said to fall under "minor wording amendments to policy" as the designation of LGS26 as land at the Sheepway Roundabout is a fundamentally different prospect.</p> <p>Therefore, from a procedural perspective, the Neighbourhood Plan process has not complied with paragraph 019 of Planning Practice Guidance on Local Green Spaces (ref: 37- 019-20140306), which states that landowners should be contacted at an early stage by the qualifying body, which in this case is Portishead Town Council and the Portishead NDP Steering Group. The Consultation Statement establishes that Persimmon Homes Severn Valley were not consulted on, with the Company missing from 'Appendix B - List of Consultees Contacted'.</p> <p>The attached email exchange with Portishead Town Council in October 2022 clarifies that the Neighbourhood Plan was always supposed to include LGS26 in the form it is in in this consultation draft and that this has not been consulted on. Table 1A of the Basic Conditions Statements again says that consultation with the community on the Local Green Spaces is included in the evidence base, but this is not the case for LGS26. (We refer you to the submissions made by PHSV specifically to LGS26).</p>	<p>exchange.pdf</p>

Respondent Name	Organisation	Comment	Attachments
		At this time in the draft Neighbourhood Plan's preparation, the NDP Steering Group should consider the implications of this going forward.	

Plan section	Where are we in the process?
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Respondent Name	Organisation	Comment	Attachments
Jones15		All green belt must be protected. if development is required should be on brown field sites. particular importance in areas around weston big wood	

Plan section	Policy Context
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Respondent Name	Organisation	Comment	Attachments
Jones15		All green belt must be protected. if development is required should be on brown field sites. particular importance in areas around weston big wood	
Exolum Pipeline Systems Ltd		Please see attached a plan of Exolum Pipeline Systems apparatus. Please contact us if any works are in the vicinity of the Exolum pipeline.	EXOLUM PLAN.pdf

Respondent Name	Organisation	Comment	Attachments
Bloor Homes South West and Aston & Co UK (Turley)	Turley	<p>2. Conformity with North Somerset Council’s Development Plan</p> <p>2.1 As our representations to the Neighbourhood Plan Regulation 14 Draft set out (found at Section 2), we have assessed whether the emerging Neighbourhood Plan has met the ‘basic conditions’, contained within Paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act (1990). This has particular regard to its ‘general conformity with the strategic policies contained in the development plan for the area of the authority’.</p> <p>Conformity with North Somerset Council’s Development Plan</p> <p>2.2 Paragraph 1.28 (previously paragraph 1.33) of the emerging NP states: <i>“The Portishead Neighbourhood Plan is being prepared in parallel with the emerging North Somerset Local Plan. To meet requirements set out by National Planning Policy and Guidance, the draft Neighbourhood Plan has been prepared to be in general conformity with the current adopted policy framework, which is the Core Strategy. However, as required by National Planning Policy, the Neighbourhood Plan looks ahead over the next 15 years, to anticipate and respond to long term needs. In doing this, it is intended that the Neighbourhood Plan policies are ‘future-proofed’ and capable of extending beyond the adopted Local Plan period.”.</i></p> <p>2.3 Paragraph 1.29 goes on to state that the NP will likely be reviewed once the North Somerset Local Plan (NSLP) has been adopted. Therefore, it is intended for the emerging NP to be in accordance with the adopted Core Strategy (CS), while ensuring the emerging policies can extend beyond the CS plan period.</p> <p>2.4 Our concerns with this approach largely remain. Indeed, the principle of this approach is confused and has resulted in inconsistencies within the emerging policies contained in the draft NP. Further details on this are provided below.</p> <p>The Plan Period</p> <p>2.5 Our concerns with the intended NP period remain. The North Somerset CS Plan Period runs from 2006 to 2026. The emerging NSLP will have a plan period from 2023-2038. The intended NP plan period is from 2022-2038 (although it is possible that this emerging plan period may be extended).</p>	Bloor Homes representation.pdf

Respondent Name	Organisation	Comment	Attachments
		<p>2.6 As raised previously, the plan period of the emerging NP will not conform with the adopted CS nor align with the plan period of the emerging Local Plan. This needs to be re-considered. North Somerset Council had scheduled to adopt the Local Plan next year, 2023. It is noted that the North Somerset Executive Committee met in October 2022 to discuss the emerging Local Plan in the context of potentially changing national reforms. At present, it is not clear whether North Somerset Council are still looking to adopt the emerging Local Plan in 2023.</p> <p>2.7 Given the current uncertainty that surrounds the emerging Local Plan, it seems logical (and in the interests of meeting the basic conditions for a neighbourhood plan (see below)) for the NP to await for the progression of the NSLP, and to be produced to ensure it is in general compliance with that plan.</p> <p>Housing Needs</p> <p>2.8 The ‘Basic Conditions’ (contained within the Town and Country Planning Act (1990)) include “having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order”. Reference to ‘national policies’ includes meeting local housing needs.</p> <p>2.9 As raised previously, the housing need figure set out in the adopted Core Strategy is now out of date. The Core Strategy was adopted in January 2017 and so is now over 5 years old. The NPPF expects plans to be reviewed at least every 5 years¹.</p> <p>2.10 The draft Local Plan currently sets out a minimum of 20,085 homes over the 15-year plan period 2023-2038, based on Local Housing Needs calculated at the time. However, as drafted there is provision for only 18,046 homes, over 10% short of the housing requirement currently stated and a shortfall that will rise substantially when an updated 2022 Standard Method Figure (a requirement for 20,880 homes) is used (as National policy requires). As such, our representations to the draft NSLP concluded that many more sites in North Somerset need to be identified and allocated for the Plan to be considered Sound.</p> <p>2.11 As such, our previous comments concerning housing needs remain. The production of a NP based on an out-of-date CS and housing need figure cannot be considered a Sound approach and would not be in conformity with</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>the NPPF. Given that the adopted CS is now out of date and the housing need figure is to increase substantially, we consider that the NP should only be progressed once the NSLP has been adopted and quantum of homes and extent of site allocations have been confirmed for Portishead.</p> <p>Settlement Boundary</p> <p>2.12 The draft NP has responded in part to our previous representations in relation to the settlement boundary. As shown at Figure 11 (on page 60), the boundary now excludes the proposed housing allocation on land to the south of Gordano school found within the emerging NSLP. As such, it aligns with the adopted Core Strategy rather than the emerging NSLP. This amendment is welcomed.</p> <p>2.13 However, the draft NP does include the emerging settlement boundary (as per the emerging NSLP) at Appendix 3. It includes land south of Clevedon Road/Gordano School. It is considered to be a premature inclusion while the emerging NSLP is still in draft form. Appendix 3 of the NP is therefore at odds with introductory paragraph 1.28 of the draft NP. We therefore recommend that Appendix 3 of the emerging NP is removed.</p> <p>2.14 Our previous representations detailed why North Somerset Council will need to allocate further land for homes to meet its Local Housing Need requirement, with Portishead being a sustainable location to accommodate further growth. While the reasons are not repeated in full here, it is worth noting the following:</p> <p>1. CS Policy 14 (Delivering Strong and Inclusive Communities) states most additional development will take place at the towns of Clevedon, Nailsea and Portishead. More specifically, CS Policy 31 (Clevedon, Nailsea and Portishead) is clear in supporting residential development at Portishead within and adjoining the settlement boundary. The policy goes on to state that proposals outside the settlement boundaries in excess of about 50 dwellings must be brought forward as allocations through Local Plans or Neighbourhood Development Plans. It is worth noting that during the examination of both the Core Strategy and Site Allocations Plan, Inspectors have sought for the development plan policies to support housing delivery. Indeed, the Inspectors Report to the Core Strategy noted:</p> <p>“It will also involve accepting a certain amount of development of an appropriate scale outside, but adjoining, the</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>settlement boundaries which can come forward not only from plan-led site allocations but also through planning applications for sustainable housing development on unallocated sites” [paragraph 29, Turley emphasis]</p> <p>2. In addition, the Inspector’s letter to the Council following the closure of hearings to the Site Allocations Plan noted the following: “In the identification of potential opportunities and in the comparative assessment of sites, I would urge the Council to work closely with the development industry. The aim should be to increase the likelihood of delivery through a wider choice of sites, and through the identification of sites which developers would commit to bringing forward within the timescale of the CS, and in particular within the first five years of the residual period to meet the shortfall in five-year supply. Developers who wish to promote omission sites may assist the Council through the preparation of a delivery trajectory for those sites” [paragraph 25, Turley emphasis]</p> <p>3. As such, the current adopted development clearly supports housing development within Portishead and on unallocated Sites adjoining settlement boundaries. It is also worth noting that the representors have also acted in accordance with CS Policy 31; a favourable EIA screening opinion has been obtained, and the Site has been promoted through the North Somerset Local Plan process supported by relevant evidence including, landscape and ecological studies and seasonal protected species surveys.</p> <p>4. The Portishead Housing Needs Assessment (prepared by AECOM, dated November 2021) (which forms part of the evidence base underpinning the emerging NP) confirms there is a relatively large group of households in Portishead who may be able to afford to rent privately but cannot afford home ownership. Indeed, 132 new affordable homes are projected over the plan period. However, the report states: “This expected level of delivery evidently falls short of the quantity of demand identified in estimates of the need for affordable housing, both for sale and for rent. This is largely due to the low housing requirement figure and low past delivery rates”.</p> <p>5. It is clear there is currently insufficient land within the existing settlement of Portishead to deliver the housing necessary to meet local housing need. However, there are sites at Portishead, such as the Representors site at Black</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>Rock that are available and deliverable and of a scale that can come forward quickly, being promoted by a house builder with an enviable track record of delivery;</p> <p>6. Greenfield sites are generally able to come forward with policy compliant levels of affordable housing, in comparison to brownfield sites that often have a high level of abnormal costs and associated viability issues. As such, greenfield sites (such as Black Rock) can make a significant contribution to the delivery of affordable housing;</p> <p>7. The Black Rock site performs equally as well in sustainability terms compared to the current draft allocation site to the south of Clevedon Road, Portishead, and better than other current draft allocations in the emerging North Somerset Local Plan;</p> <p>8. Indeed, consideration needs to be given to the promotion of the Wyndham Way Study Area (currently considered at page 130 of the draft NP). At present, a portion of the Site is a protected employment allocation (Gordano Gate). As the NP needs to be in accordance with the currently adopted Development Plan, careful consideration needs to be had how the Wyndham Way Study Area is presented within the NP.</p> <p>9. Notwithstanding the above, as the Wyndham Way Draft Masterplan demonstrated, there are 58 different landowners within the study area. This is clearly a significant number and a resultant challenge when seeking to prepare a framework for how redevelopment can come forward. Indeed, the number of different landowners has the potential to prevent or slow delivery of proposals coming forward. It is also noted that members of the public and Town Council has previously objected to loss of employment land within the masterplan area. Application 18/P/3591/OUT sought outline permission for the redevelopment of land within the masterplan area for a mix of uses, including employment generated uses and dwellings. However, during the consideration of that application, 434 objections were lodged. A prominent focus within these objections was regarding the loss of employment land and provision of housing. As such, it is unclear how development proposals can come forward in a cohesive and complementary manner in this area to meet local needs;</p> <p>2.15 If, as we expect to be required, North Somerset need to identify further sites for homes, with the potential that</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>further sites, such as Black Rock, are found to be appropriate for allocation, then that will need to be reflected within the NP.</p> <p>Summary</p> <p>2.16 Our previously raised concerns with regards to the conformity of the draft NP with North Somerset Council's Development Plan largely remain. While the amendments to the settlement boundary is welcomed, there are some instances where the emerging NP aligns with the CS but others where it more closely aligns with the emerging Local Plan. This is not in accordance with relevant legislation, the NPPF or the PPG.</p> <p>2.17 To ensure consistency and clarity, we consider that the NP should be progressed and adopted once the emerging NSLP has been further progressed and adopted (2023), and when proposals within that plan, including up to date housing needs and proposed allocations are known and have been found to be Sound.</p>	

Plan section	About Portishead
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Respondent Name	Organisation	Comment	Attachments
active		<p>It is absolutely imperative that Portishead is not any more overcrowded, there are signs that this will be the case if development remains unchecked. Your own statement admits that the town has grown by 60% in 20 years. This is an astounding revelation given the infrastructure is not in place to accommodate this amount of increase in residents. We have just been notified that we won't have a post office in 2023 and that we should travel to Pill (less than 25% the size of Portishead in terms of population) in order to use the PO there. There are inadequate chemists, doctors surgeries, school places and this is before the Wyndham Way development commences. We have been treated very badly, and unfairly.</p>	

Respondent Name	Organisation	Comment	Attachments
SueM		There were two power stations, one was coal-fired, the other was an oil-fired.	
Hilary Nicoll		<p>Please, please give our town a decent post office in the High St.</p> <p>Consider the mums with prams/ pushchairs also the older folk with motorbility scooters who need access.</p> <p>Traffic congestion in and around Portishead with a decent thought for scholars getting to and from schools. My grandson waits over an hour to come home from Clevedon to Portishead rain and shine with no shelter.</p> <p>Residents should be fined for allowing hedges to over hang pavements. They clearly are not walkers but so many trees/ hedges are blocking walkers/ prams etc!</p> <p>Portishead residents need a proper bus service. Access to The Mall, Bristol weston Super Mare and Yatton too. We are so limited, stuck and what was a treat to shop is a major headache.</p> <p>Doctors surgery are struggling as are our local chemists. One day all 3 were closed meaning scripts were not available! It's ridiculous as medication access is vital for all.</p> <p>Portishead is beautiful and an envy to many that don't live here.</p>	Hilary Nicoll_Redacted.pdf

Plan section	A brief history of Portishead
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Respondent Name	Organisation	Comment	Attachments
Susan B		It's good that the planners have noted the failures of the last major development - north of the marina - to provide the	

Respondent Name	Organisation	Comment	Attachments
		<p>infrastructure required for such an influx of residents. Hopefully this will be addressed before any further building is permitted.</p> <p>Our remaining green spaces should also be permanently protected</p>	
active		<p>I don't agree with the statement about the Portishead railway line. We have been promised this necessary infrastructure since the 1980's which is more like in excess of 40 years plus, not the 25 years as stated. There was an announcement made on the 14th November 2022 that the railway is coming. There have been many false dawns which thus far have come to nothing. Many residents in Portishead raise their concerns via social media, check on the local Facebook groups for evidence of scepticism regarding this most recent announcement, many feel this to be more a political announcement as opposed to reality. It seems that Portishead has become a dumping ground for housing, hence your statement about it being a commuter town. We need more businesses to be based here in order to reduce car travel and carbon gases. All those who try to use the buses in order to help with climate change have been badly let down by the lack of public transport. In summary: no railway, a severally reduced bus service equals more car use for all those who travel outside Portishead for work, hospital appointments etc. Portishead was promised a hospital to be located where the Aldi supermarket is again, that came to nothing. In essence Portishead is the second largest town in N. Somerset with no railway, (unlike Yatton, Nailsea/Backwell and WSM) NO MORE HOUSING.</p>	
Persimmon Homes Severn Valley	Persimmon Homes	<p>We note at paragraph 1.44 the incorrect, unnecessary and unhelpful reference that "Portishead is famously known as the largest cul-de-sac in Europe ... ". It is not a cul-de-sac nor is it 'famously' known as such. This statement should be deleted as contrary to the Neighbourhood Plan's purpose in supporting the town's growth.</p>	Persimmon Homes Severn Valley.pdf
Bloor Homes South West and Aston & Co UK	Turley	<p>3.1 It is considered the introduction to the draft NP and associated evidence base fails to acknowledge development history to the west of Portishead.</p>	

Respondent Name	Organisation	Comment	Attachments
(Turley)		<p>3.2 Indeed, the Portishead Community Character Assessment (that forms part of the evidence base underpinning the draft NP) provides limited detail on the commercial activity and growth of the western portion of Portishead. A Cultural & Heritage Report (dated Nov 2018, prepared by Aston & Co UK Ltd) is submitted with these representations (at Appendix 9). The report provides a clear breakdown of the development history within the west of Portishead (at pages 25 -29).</p> <p>Most notably, a brickworks, a lime kiln and limestone quarrying industry developed from small beginnings to a large industrial scale operation within the west of Portishead. The report confirms that with the increase in industrial operations, 12 cottages were constructed for the workers in 1928. These cottages became known as Black Rock Villas. A further notable development was the introduction of light rail connections from Black Rock and Nightingale Quarries to an interchange on the Portishead to Clevedon Light Railway, allowing connection to the GWR network at Portishead Station. The quarry owned about 75 standard gauge wagons which illustrates the scale of mineral operations.</p> <p>3.3 Most notably, a brickworks, a lime kiln and limestone quarrying industry developed from small beginnings to a large industrial scale operation within the west of Portishead. The report confirms that with the increase in industrial operations, 12 cottages were constructed for the workers in 1928. These cottages became known as Black Rock Villas. A further notable development was the introduction of light rail connections from Black Rock and Nightingale Quarries to an interchange on the Portishead to Clevedon Light Railway, allowing connection to the GWR network at Portishead Station. The quarry owned about 75 standard gauge wagons which illustrates the scale of mineral operations.</p> <p>3.4 Therefore, there is a clear development history within the western portion of Portishead that helped shape the town. Indeed, a history of notable industrial operations and associated infrastructure. It is considered that this needs to be reflected within the Community Character Assessment and NP, and to not do so is a clear deficiency in the evidence base.</p>	
Plan section		The climate crisis and Portishead	

Respondent Name	Organisation	Comment	Attachments
Susan B		<p>A fascinating fact regarding the small-leaved limes.</p> <p>It's pleasing to note that protection of the natural environment will be a priority; it seems that many of the residents who use it don't realise, or care about, its importance.</p>	
Jones15		All green belt must be protected. if development is required should be on brown field sites. particular importance in areas around weston big wood	
James	Citizen	<p>Your document states that the Vale open space is attractive. I disagree. The state of the pond between Galingale Way and Holmlea is a disgrace. It is overgrown, full of junk and in desperate need of a massive clean up. In short it is an eyesore. Please do not use the excuse that it is good for nature. The Nature Reserve is good for nature, but does not look an eyesore. Please improve the pond so that your description 'attractive' ceases to be a lie.</p> <p>The pond is also part of Portishead flood defences. How it is supposed to move flood water away when it is clogged up? There has also been an increase in mosquitoes, a sure sign that the pond water is static and not flowing as it was originally designed to do. With rising sea levels an effective flood dispersal system is essential.</p>	BA3F9114-423D-44CE-830B-2A22EC51754E.jpeg
Environment Agency	Environment Agency	The Environment Agency supports the submission and has no comments to make in addition to those made 5 May 2022 to Portishead Town Council, attached for information.	Environment Agency response to Reg 14 consultation.pdf

Respondent Name	Organisation	Comment	Attachments
Persimmon Homes Severn Valley	Persimmon Homes	In referencing the flood concerns, it is also relevant in the Neighbourhood Plan's text to explain that effective flood defences have been constructed and so delivering new homes and other development and infrastructure in Portishead.	Persimmon Homes Severn Valley.pdf

Plan section	Pre-application community engagement
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Respondent Name	Organisation	Comment	Attachments
Jones15		All green belt must be protected. if development is required should be on brown field sites. particular importance in areas around weston big wood	
active		Agree that community engagement is essential.	

Plan section	Vision
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Respondent Name	Organisation	Comment	Attachments
Jones15		All green belt must be protected. if development is required should be on brown field sites. particular importance in areas around weston big wood	
active		I do not agree with cycling lanes in the High St which was a topic at a recent Town Council meeting. I am bemused	

Respondent Name	Organisation	Comment	Attachments
		about the point about using brownfield land, and housing in the same sentence. I feel it is a contradiction to state that infrastructure and housing should be "sufficient to meet local needs". On brownfield land, I am unaware of any brownfield land which would be suitable for housing, Old Mill Rd is employment land and must be utilised this way for all the reasons previously raised. On the infrastructure point as previously stated we have insufficient infrastructure at the moment to support local needs. NO MORE HOUSING IN PORTISHEAD.	
SueM		Agree	
Strongvox Homes (Land south of Clevedon Road)		<p>The draft visions set out the need for sustainable growth and housing to meet local need, as noted in previous representation the client supports these objectives and considers them appropriate. Portishead is identified as a 'Service Centre' which, alongside Clevedon and Nailsea, sits just below Weston-super-Mare within the settlement hierarchy. It is, therefore, important that Portishead provides appropriate new development.</p> <p>With regard to these objectives, and as previously set out in prior representations, the 'Wellbeing' objectives similarly recognise the importance of new housing and meeting the needs of the local community. These policies continue to be supported.</p>	Strongvox via Pegasus land s of Clevedon Rd.pdf
Persimmon Homes Severn Valley	Persimmon Homes	<p>The Vision should reflect and so align with that underpinning the emerging North Somerset Local Plan (its Vision and Strategic Priorities). One which refers to responding positively to housing need - providing a mixture of new homes and economic opportunities consistently throughout the plan period.</p> <p>The objectives, under 'Prosperity' of the Neighbourhood Plan should also reflect the Local Plan given that Portishead should be identified as a location for growth and responding to its role as a sustainable main town in the district to deliver North Somerset's housing need.</p>	Persimmon Homes Severn Valley.pdf

Plan section

Objectives

Respondent Name	Organisation	Comment	Attachments
Jones15		All green belt must be protected. if development is required should be on brown field sites. particular importance in areas around weston big wood	
Susan B		<p>It's obvious that a huge amount of work has gone into producing this plan and the contributors should be commended for it.</p> <p>Now they must ensure that the plan will be implemented and should not be pressurised into backing down from their positive list of objectives by other authorities or pressure groups.</p>	
active		<p>Under objectives-Environment- 05/06 It is contradictory to even consider new development given the acknowledgement that Portishead has expanded by 60% in 20 years and that Portishead is a commuter town! Any new development will impact the environment simply because residents will be forced to travel out of Portishead using cars due to lack of public transport and employment within the town. The character and distinctiveness of Portishead has already changed due in part to the rapid growth in the population.</p> <p>Under Wellbeing-07 Where is the brownfield land in Portishead? I recognise employment land but certainly nothing for housing is available.09 Any overdevelopment of the town will adversely impact people's health, doctors's appointments are under threat due to rapid expansion of the housing in Portishead without the appropriate infrastructure. NO MORE HOUSING.</p> <p>Under Prosperity: This will suffer if brownfield sites are used for housing and not business opportunities.013 I am intrigued by the "integrated transport network" we currently have very few buses, no railway. Are we expected to believe that this will be forthcoming shortly given our economy is sliding towards a recession and currently facing cost of living crisis? NO MORE HOUSING!</p>	

Respondent Name	Organisation	Comment	Attachments
SueM		Agree	
Cheryl Beech		Ensure infrastructure i.e library doctors/shops/train remain servicable for the community now and in the future.	Cheryl Beech.pdf

Plan section Part 2: Planning Policies and Community Actions

Respondent Name	Organisation	Comment	Attachments
Jones15		All green belt must be protected. if development is required should be on brown field sites. particular importance in areas around weston big wood	
active		We are facing the biggest threat to our environment, cost of living and general wellbeing. I don't believe the "vision" will be achieved.	

Plan section List of Environment Policies

Respondent Name	Organisation	Comment	Attachments
active		Any housing permitted in Portishead will impact residents. Objectives will not be met unless any planned housing development is curtailed.	

Plan section		Policy PEN1: Landscape Setting and Views	
Respondent Name	Organisation	Comment	Attachments
Ian	Mr	<p>I strongly agreed with:</p> <p>3.14 The last remaining open spaces, particularly the area around Weston Big Wood and farmland and floodplain outside the settlement boundary, are valued as settings to the town and for their role as local green spaces. They also deliver multiple ecosystem services and benefits (as set out in the Portishead Green and Blue Infrastructure Evidence Base Report 2022) and consequently should never be built on.</p>	
Jones15		All green belt must be protected. if development is required should be on brown field sites. particular importance in areas around weston big wood	
active		NO MORE HOUSING	
Persimmon Homes Severn Valley	Persimmon Homes	<p>We note that the Neighbourhood Plan has been supported by technical evidence reports and for Landscape by a 'Local Key Views Report' 2022. The report identifies 'Key Views' that can be recorded and given extra significance - albeit the practice methodology for a document that is to become a statutory documents is not fully explained.</p> <p>Turning to the policy itself, we note that in those locations where local key views are to be affected they should show how any adverse effects have been demonstrated. Sound development control policies through Local Plans are best suited to address matters to ensure that views of areas of change in the environment are properly considered and addressed.</p> <p>The 'Outside of the Plan Area' view at page 14 of the document is also helpful as a reference point for consideration of development along the visible urban edge and in the boundary of Portishead as photographed.</p>	Persimmon Homes Severn Valley.pdf

Respondent Name	Organisation	Comment	Attachments
Bloor Homes South West and Aston & Co UK (Turley)	Turley	<p>3.5 Draft Policy PEN1 seeks to conserve and enhance the landscape setting of Portishead and its landscape character. The draft policy is accompanied with a ‘Landscape Type Map’.</p> <p>3.6 The draft NP has responded to our previous representations and now includes further commentary as to how the landscape character areas have been defined and provides a table that sets out the strategy for each Landscape Character Area (Figure 2, page 29). Para 3.13 confirms the LCA’s have been derived from the North Somerset Council ‘Landscape Character Assessment’ (2018) Supplementary Planning Guidance [SPD]. This further clarification is welcomed.</p> <p>3.7 However, it is noted the draft policy seeks to conserve and enhance the landscape setting of Portishead and its landscape character, views, and features. It is considered that as currently prepared, the draft policy is at odds with the NPPF. Indeed, paragraph 174 of the NPPF states:</p> <p>“Planning policies should protect and enhance valued landscapes, sites of biodiversity or geological value and soils in a manner commensurate with their statutory status or identified quality in the development plan” (Turley emphasis)</p> <p>3.8 As such, the level of protection Draft Policy PEN1 is affording Landscape Character Areas does not align with their status or identified quality in the Landscape Character Assessment SPD. To ensure a more nuanced approach that affords a proportionate level of protection, in line with the NPPF, we consider the draft policy should be amended to: “Any development should seek to either conserve and enhance the landscape setting of Portishead and its landscape character, views and features, including those identified on Figure 2 or recognise its intrinsic character in accordance with paragraph 174 of the NPPF” [additions shown in underline].</p> <p>Key Views Report</p> <p>3.9 Draft Policy PEN1 goes on to state: “Development proposals that are likely to affect any of the local key views shown on Figure 3, and described in the Portishead Local Key Views Report, should assess the effect of the proposals on the view(s) and demonstrate how any adverse effects have been addressed”</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>3.10 The “Portishead Local Key Views Report” forms part of the evidence base underpinning the draft policy. It is recognised that the Key Views Report has been amended in response to our previous representations, with the removal of Key View 4.2. This amendment is welcomed.</p> <p>3.11 However, it is noted that an additional section named ‘Key View Type 4: From the Gordano Valley towards Portishead – OUTSIDE THE PLAN AREA’ is now included within the report. The section includes the following text: “Whilst the majority of this area is outside of the Neighbourhood Plan boundary, there are some significant green areas, particularly around Weston Big Wood, that are potentially under pressure of development which would significantly alter the character of the valley...even small additional development outside of the current housing boundary would significantly impact on the rural nature of the valley. Views from outside the boundary of the Neighbourhood Plan have therefore been included for illustrative purposes only as it is recognised that the Neighbourhood Plan can only apply to areas within the Plan Area Boundary”.</p> <p>3.12 It is considered the above text should be removed from the evidence document. Firstly if the Council recognises the Neighbourhood Plan cannot apply policies to areas outside of the Plan’s boundary, it is not clear why the above text is required. If it is retained, there remains a risk that the section is afforded weight in the consideration of future planning applications. Given the draft text does not align with the adopted policies contained within North Somerset Council’s CS, this potential weight would be inappropriate.</p> <p>3.13 Secondly, it is not clear how or why one selective viewpoint has been chosen. It is considered that one viewpoint cannot represent character and appearance of landscape as a whole. Crucially, there is no evidence to underpin or substantiate the draft report’s conclusions and no guidance as to how those conclusions have been reached. This calls into question the robustness of the report and whether it can be relied upon to inform future policy.</p> <p>3.14 As such, we have concerns with the methodology and findings of the Local Key Views Report, and also the current wording of the draft policy. At present, the draft policy cannot be considered Sound due to unjustified evidence that underpins it.</p> <p>3.15 Therefore, we consider the draft policy be amended to:</p>	

Respondent Name	Organisation	Comment	Attachments
		“Development proposals that are likely to affect any of the local key views shown on Figure 3,(delete- and described in the Portishead Local Key Views Report), should assess the effect of the proposals on the view(s) and demonstrate how any adverse effects have been addressed”.	

Plan section	Policy PEN2: Portishead's Green and Blue Infrastructure
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Respondent Name	Organisation	Comment	Attachments
Jones15		All green belt must be protected. if development is required should be on brown field sites. particular importance in areas around weston big wood	
Tom Hamilton-James		<p>I am very concerned about the land close to Weston Big Wood being earmarked for development. This is the land between and near The Downs and Weston Big Wood. This is a ridiculous location. It would do harm to the existing wildlife, even if the wood itself not subject to development, any adjacent development would do untold damage. The area is currently used extensively for walkers and dog walkers. The area further down, below any proposed development is protected from rain flow etc. due to the existing plant/vegetation. To build over this would create issues in areas below any proposed development. Please, this is not the place for development, save our green spaces.</p> <p>On a related note, there have been discussions about part of Merlin Park being used as a bike park. Another crazy idea. Merlin Park is a cul-de-sac, there is not any parking for such a facility. The field is used by walkers, football, dogs and a general nice green area. Accept there is demand for a skatepark and that seems to be happening at the lake ground. No where has there been any demand for a bike/bmx park. Even if there is, Merlin Park is the most ill thought location for it.</p>	Tom Hamilton James_Redacted.pdf

Respondent Name	Organisation	Comment	Attachments
Wessex Water (Ruth Hall)	Wessex Water	<p>We welcome the inclusion of Policy PEN2 Portishead’s Green and Blue Infrastructure. Wessex Water support the use of sustainable drainage systems (SuDS) to manage flood risk, sewer flooding and improve water quality and provide biodiversity and amenity benefits. Appropriately designed SuDS can form part of the Green and Blue Infrastructure Network. Best practice is to mimic the natural state of the site prior to development, installing Sustainable Drainage Systems</p> <p>can help achieve this. SuDs are designed to hold the surface water on site (attenuate) and then release (discharge) slowly to the environment through the SuDS hierarchy. Attenuation or storage, is often but not restricted to, the use of underground tanks or pipes. SuDS attenuation can take a more natural form; green roofs, ponds and swales offer other development benefits for amenity, ecology and water quality.</p>	Wessex Water_Redacted.pdf
Natural England	Natural England	<p>The Portishead Neighbourhood Development Plan appears to be a thoroughly researched and generally positive document that reflects local aspirations for the area and is underpinned by robust evidence in relation to the natural environment.</p> <p>As described in the draft Plan, Portishead Parish has a distinctive and varied landscape character and landscape setting that affords numerous and expansive views that contribute to its unique sense of place. The Parish also contains a rich and diverse natural environment, including parts of international, European, national, and locally designated sites, as well as numerous parks and green spaces and an extensive range of priority habitats, including irreplaceable ancient woodlands. We welcome the recognition of the importance of the natural environment and its value to local communities in Portishead, which is well reflected throughout the Plan.</p> <p>We welcome the policy support for the protection, enhancement and management of green and blue infrastructure and the clear recognition of its multifunctional benefits for nature and climate and health and prosperity within and beyond the Plan area. We are pleased to note the references to the GBI Evidence Base Report and Portishead Community Character Statement, which will help to ensure new development provides GBI that reflects and responds positively to the local context and meets the aims and aspirations of the community.</p> <p>We consider that Policy PEN2 would be further strengthened by including a reference to the National Green Infrastructure Framework – Principles and Standards for England Home</p>	Natural England.pdf

Respondent Name	Organisation	Comment	Attachments
		(naturalengland.org.uk) as we believe this would help to ensure that the planning and provision of new green infrastructure from new development would be informed by the most up to date evidence and requirements for green infrastructure and meet the highest standards. The National GI Framework is evolving, and Natural England is in the process of developing national GI standards, which should be available early in 2023. We would also expect the GI Framework to be relevant to a range of other policies in the Plan, including POLICY PEN3 - FLOOD RISK AND NATURAL FLOOD MANAGEMENT.	
Persimmon Homes Severn Valley	Persimmon Homes	Whilst the wording to Policy PEN2 is admirable, it is important to separate the functional aspects of blue infrastructure. Its management can be expanded to support the delivery of new development subject to agreement with the relevant authorities, namely the LLFA, EA and IDB. Policy PEN2 should not reference the evidence base document, 'Portishead GBI Evidence Base Report' in its wording as the Evidence Base Report itself is not subject to any change/modification through the Examination process.	

Plan section	Policy PEN3: Flood Risk and Natural Flood Management
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Respondent Name	Organisation	Comment	Attachments
Susan B		There should be no further building on food plains or other areas which will be at risk from flooding in the future.	
active		NO MORE HOUSING	

Respondent Name	Organisation	Comment	Attachments
Wessex Water (Ruth Hall)	Wessex Water	Neighbourhood Plan Policy PEN3 Flood Risk and Natural Flood Management identifies that Major Development should include provision of SuDs. We find many smaller developments can present as much flood risk and environmental harm as large developments due to the nature of the catchment, lack of space on site for attenuation and viability concerns. Further information can be found within our Surface Water Policy for Minor Development available on our website https://www.wessexwater.co.uk/services/building-and-developing/planning-liaison	Wessex Water.pdf
Persimmon Homes Severn Valley	Persimmon Homes	Policy PEN3 should not reference the evidence base document, 'Portishead GBI Evidence Base Report' in its wording as the Evidence Base Report itself is not subject to any change/modification through the Examination process	Persimmon Homes Severn Valley.pdf

Plan section

Policy PEN4: Biodiversity

Respondent Name	Organisation	Comment	Attachments
Susan B		Yes, it is not good enough for NSC to claim that they have 'rewilded' by planting several hundred trees, many of which have not survived because no thought was given to their care and future management. I have helped plant the trees and have also been involved with the grassland surveys and can see the same thing happening; the council has had a 6 month involvement with the Avon Wildlife Trust who had a grant to do this project. This is now over and the work is being handed to local volunteers to continue. The council's plan with grasslands seems to be to let it grow then mow and remove at the end of summer. This is to help increase floral diversity. It does not help insects, such as some butterflies, which overwinter in some form in the long grass. Some should be left standing. More work needs to be done with experts to ascertain which species we do have, or should be able to attract, and a management plan put in place to help/encourage them.	

Respondent Name	Organisation	Comment	Attachments
		<p><u>DOGS!</u> There seems to have been a huge increase in the number of dogs locally. Our wildlife areas, particularly the nationally significant ones, must be better protected from them either by restricting access - including a complete ban at certain critical times of year - and insisting they are under close control at all times.</p>	
Jones15		<p>All green belt must be protected. if development is required should be on brown field sites. particular importance in areas around weston big wood</p>	
Natural England	Natural England	<p>We welcome the policy requirement for new development to provide a minimum of 10% biodiversity net gain (BNG), but we recommend a further requirement is included in Policy PEN4 to require BNG to be provided in accordance with the latest Defra Metric (currently 3.1) The Biodiversity Metric 3.1 - JP039 (nepubprod.appspot.com). We think that this would help to secure a consistent approach to calculating gains and losses across the Plan area and ensure that those rules and principles that apply to BNG are followed. For example, BNG must be compliant with the mitigation hierarchy, as outlined in paragraph 175 of the NPPF - applying the mitigation hierarchy means aiming to retain habitats in situ and avoiding or minimising habitat damage so far as possible, before looking to enhance or recreate habitats. Biodiversity net gain should always be additional to any habitat creation required to mitigate or compensate for impacts, and it cannot be applied to irreplaceable habitats. It is also important to recognise that the BNG metric does not change the protection afforded to biodiversity and that existing levels of protection afforded to protected species and habitats are not changed by use of this or any other metric.</p> <p>Severn Estuary designated sites</p> <p>We welcome the references in the Plan to the Severn Estuary, which is a European Marine Site (EMS), designated as a Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site, underpinned by the Severn Estuary Site of Special Scientific Interest (SSSI).</p> <p>The interest features of the Severn Estuary designated site are sensitive to the effects of new development, for example as a result of disturbance or pollution. We think it would be helpful for the context text for Policy PEN4 to recognise that impacts on the Severn Estuary designated site can result from development outside the site boundary and to acknowledge the importance of inland habitats for bird species associated with the Severn Estuary SPA and Ramsar site;</p>	<p>Natural England.pdf</p>

Respondent Name	Organisation	Comment	Attachments
		<p>for example, within Portishead Parish there are important high tide roosts at Portbury Wharf (notably at Chapel Pill) and between Battery Point and Redcliff Bay (at Woodhill Bay). More details of these roosts can be found in the RP02366 Edition 1 Severn Estuary High Roost Study Phases 2 and 3 Aust to Clevedon and Bridgwater Bay (15).pdf</p> <p>North Somerset & Mendip Bats Special Area of Conservation (SAC) While we appreciate the NDP area does not contain any SSSI components of the Bats SAC; the importance of habitats within Portishead Parish for horseshoe bats associated with the SAC has been demonstrated by the findings of the bat surveys undertaken to support the MetroWest passenger upgrade scheme, which recorded significant greater horseshoe bat activity along the railway line to Portishead and this importance is also reflected in the North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document Microsoft Word - FULL Adopted SPD, Word version (n-somerset.gov.uk) which shows that the majority of Portishead Parish lies within the Bat Consultation Zone, Bands B and C.</p> <p>With the above in mind, we recommend that the context text for Policy Pen4 includes a reference to the importance of Portishead Parish for horseshoe bats associated with the Bats SAC and directs prospective developers to the Bats SAC SPD to ensure that new development adequately considers habitats and features that support the SAC bat populations and that potential impacts on these will be properly assessed and can be avoided or mitigated.</p>	
Bloor Homes South West and Aston & Co UK (Turley)	Turley	<p>Biodiversity Value 3.16 It is recognised the draft policy has been amended to remove the term ‘biodiversity value’. As we set out previously, the term ‘biodiversity value’ was not defined. As such, there was risk the emerging policy would be applied inconsistently within development proposals. The removal of the term is a welcome change and responds to our previous representations.</p> <p>Biodiversity Net Gain 3.17 It is noted the draft policy maintains a requirement for a “minimum of 10% net gain in biodiversity”. As per our previous representations, the requirement for 10% BNG is not currently established in adopted Local or National Planning Policy or enacted in legislation. Whilst the emerging NSLP has a draft policy on net gain requirements,</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>seeking a 10% BNG, the Neighbourhood Plan's requirement for such at this stage is further evidence of the Neighbourhood Plan's confused approach as to which Development Plan (adopted or emerging) it is intended to be consistent with.</p> <p>3.18 It is considered that this policy is not necessary and that the requirement for BNG will instead be set by either the Emerging Local Plan and/or Legislation once the Environment Act has been formally enacted.</p> <p>Sites of Special Scientific Interest</p> <p>3.19 The draft policy goes onto state:</p> <p>“Development which is likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments), will not normally be permitted”.</p> <p>3.20 The draft policy is not in accordance with paragraph 180 of the NPPF. Indeed, paragraph 180 permits development where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest. This is not recognised within the emerging policy and therefore should be amended.</p>	

Plan section	Policy PEN5: Trees, Hedgerows and Woodland
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Respondent Name	Organisation	Comment	Attachments
Gee		I think the aim should be to exceed "SDG 15 – Life on Land" and associated requirements, not "at the very least" meet them.	

Respondent Name	Organisation	Comment	Attachments
Ian	Mr	Agree with all of this. Would like to see buffer zones of at least 100m.	
Jones15		All green belt must be protected. if development is required should be on brown field sites. particular importance in areas around weston big wood	
Parker Strategic Land		<p>1.1 These representations have been prepared on behalf of Parker Strategic Land in response to the Regulation 16 Neighbourhood Plan.</p> <p>1.2 Parker Strategic Land (PSL) is promoting land at Tower Farm within the Neighbourhood Plan Area. Adjoining the land which PSL is promoting is Weston Big Wood, which is a Site of Scientific Interest and an Ancient Woodland.</p> <p>1.3 This response concerns specifically Policy PEN5 – Trees, Hedgerows and Woodland.</p> <p>1.4 The basic conditions tests for a Neighbourhood Plan requires its policies and proposals to have regard to national policies and advice contained in guidance issued by the Secretary of State.</p> <p>1.5 As will be demonstrated, Policy PEN5 does not properly reflect advice concerning Ancient Woodland and should therefore be amended.</p> <p>Basic Conditions and National Policy and Guidance</p> <p>2.1 For a draft Neighbourhood Plan to be put to a referendum and to be Made it must meet each of a set of basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.</p> <p>2.2 There are seven basic conditions. Basic Condition a. is as follows:</p>	Parker Strategic Land PEN5.pdf

Respondent Name	Organisation	Comment	Attachments
		<p>“having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan)”</p> <p>2.3 National policies are set out in Government Statements, chiefly in the National Planning Policy Framework. This is supported by the Government’s Planning Practice Guidance.</p> <p>2.4. In the context of the natural environment §180 of the NPPF states: When determining planning applications, local planning authorities should apply the following principles:</p> <p>(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;</p> <p>(b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;</p> <p>(c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and</p> <p>(d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.</p> <p>2.5. Natural England and the Forestry Commission, both of which are Government Agencies published advice in January 2022 as to how to assess a planning application when there are Ancient Woodland, ancient trees or veteran trees on or near a proposed development site.¹</p> <p>2.6. Advice concerning buffer areas is as follows:</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>Use of buffer zones Buffer zones can protect ancient woodland and individual ancient and veteran trees and provide valuable habitat for woodland wildlife, such as feeding bats and birds. The size and type of buffer zone should vary depending on the: scale and type of development and its effect on ancient woodland, ancient and veteran trees character of the surrounding area For example, larger buffer zones are more likely to be needed if the surrounding area is: less densely wooded close to residential areas steeply sloped</p> <p>Buffer zone recommendations For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic.</p> <p>2.7. This is important in the context of a Neighbourhood Plan which is required to have regard to Government advice; planning policies in a statutory development plan should be consistent with such guidance and should not set a different policy approach.</p> <p>3. Policy PEN5 – Trees, Hedgerows and Woodlands</p> <p>3.1 This Policy seeks to protect irreplaceable habitats of Ancient Woodland from development proposals that would result in their loss of deterioration. This is consistent with S180c, as set out above, save for the circumstances where there are wholly exceptional reasons to permitted development.</p> <p>3.2. The Policy continues by setting out a buffer area to separate development from Ancient Woodland and the SSSI specifically at Weston Big Wood, albeit as S3.35 of the Neighbourhood Plan identifies, other ancient woodlands exist in the plan area.</p> <p>3.3. The principle of a buffer is consistent with the advice referred to above. However, the magnitude of the buffer</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>area is enlarged substantially in the Policy compared to the advice.</p> <p>3.4. The Policy is proposing that “a 50 - 150metre buffer should be maintained between any development and the Ancient Woodland of the SSSI Weston Big Wood, including during the construction phase, in order to avoid adverse impacts on this irreplaceable habitat, unless the applicant can demonstrate very clearly how a smaller buffer would be acceptable.”</p> <p>3.5. Plainly the starting point for a buffer should be “at least 15 meters” and not 50m which Policy PEN5 prescribes. This is clearly at odds with National Policy and Advice. As evidenced above only in particular circumstances determined by an assessment should a buffer be larger and it would be appropriate to establish this in the circumstances of individual development proposals. Put simply, national advice is not set up on the basis that is it for an applicant to demonstrate that a lesser buffer than 50-150m is acceptable.</p> <p>3.6. In the supporting text to Policy PEN5, §3.37 refers to a “Manual” produced by the Woodland Trust in 2019. This does not take precedence over the 2022 Advice from Natural England and the Forestry Commission to which the basic condition test refers. It is instructive that the Manual in fact states the following: “As a precautionary principle, a minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice. A larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.”</p> <p>3.7. Viewed in this context, and as is evident from the Basic Conditions Statement published alongside the consultation document, Policy PEN5 is seeking to afford statutory weight to the Woodland Trust’s Manual but with an additional 100m buffer for which there is no justification.</p> <p>3.8. S3.37 continues by referring to a precautionary principle being adopted in relation to Weston Big Wood in order “to achieve the biggest possible buffer [to] separate ancient woodland and any development that comes forward”. Again, this approach is not consistent with national advice.</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>3.9. Rather the correct approach would be to determine the extent to which a development proposal would potentially impact on the SSSI, such as degradation of the Ancient Woodland habitats through recreational disturbance, impacted air quality, and altered hydrology. This should consider how such impacts can be mitigated, and should consider the role of a protective habitat buffer and its size in this context. This is considered to be the approach which Policy PEN5 should secure to be consistent with National Policy and Advice.</p> <p>3.10. Policy PEN5 should be recast accordingly.</p> <p>4. Site of Special Scientific Interest – Impact Risk Zone</p> <p>4.1. The Basic Conditions Statement refers to Natural England’s Impact Risk Zone citing the 50m and 150m zones. The Neighbourhood Plan has then adopted these zones as policy restrictions. This misrepresents the purpose of the Impact Risk Zones and wrongly affords them statutory weight.</p> <p>4.2. Natural England’s advice is that the Impact Risk Zones² are “For use by Local Planning Authorities to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites and determine when to consult Natural England”. They are not designations that should be afforded a policy status in a development plan.</p> <p>5. Proposed amendment to Policy PEN5</p> <p>5.1. In the context of the above, we consider Policy PEN5 should be amended as follows.</p> <p>Development proposals will be expected to demonstrate no loss, or deterioration of the irreplaceable habitats of Ancient Woodland (as shown on Figure 7). Development proposals directly or indirectly <i>adversely</i> affecting Ancient Woodland and ancient trees or veteran trees identified in the Neighbourhood Plan Area will be resisted. <i>Development proposals should be set back at least 15m from the boundary of an Ancient Woodland</i> (delete following text "A 50 - 150metre buffer should be maintained between any development and the Ancient Woodland of the SSSI Weston Big Wood, including during the construction phase"). In order to avoid adverse impacts on (delete "this") <i>these</i> irreplaceable habitats, unless the applicant can demonstrate very</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>clearly how a smaller buffer would be acceptable..</p> <p>5.2. Consequential amendments to the supporting text would also be necessary.</p>	
<p>Bloor Homes South West and Aston & Co UK (Turley)</p>	<p>Turley</p>	<p>Ancient and Veteran Trees</p> <p>3.21 In relation to Ancient and Veteran Trees, emerging Policy PEN5 states:</p> <p>“Development proposals directly or indirectly affecting Ancient Woodland and ancient trees or veteran trees identified in the Neighbourhood Plan Area will be resisted. A 50 – 150 metre buffer should be maintained between any development and the Ancient Woodland of the SSSI Weston Big Wood, including during the construction phase, in order to avoid adverse impacts on this irreplaceable habitat, unless the applicant can demonstrate very clearly how a smaller buffer would be acceptable” (our emphasis) .</p> <p>3.22 We recognise the importance of protecting ancient woodland and veteran trees. We note that the draft policy has been amended to reduce the required buffer from 150m to a buffer of between 50m-150m. While the reduction in buffer is welcomed, we maintain that the draft policy remains too restrictive and onerous, and it is not clear how or why the buffer zone distances have been derived. In particular, it does not align with the paragraph 180 of the National Planning Policy Framework [NPPF], standing advice from Natural England and Forestry Commission or the emerging North Somerset Local Plan.</p> <p>3.23 The NPPF is clear in stating “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists” [paragraph 180]. Emerging Local Plan policy DP34 states development proposals affecting existing trees must demonstrate that “ancient woodland and veteran/ancient trees are protected”.</p> <p>3.24 With regards to buffer zones for ancient woodland, standing advice from Natural England and Forestry Commission (and a material planning consideration for local planning authorities) is clear in stating: “for ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid</p>	<p>Bloor Homes representation.pdf</p>

Respondent Name	Organisation	Comment	Attachments
		<p>root damage (known as the root protection area)”. 3.25 It is clear that emerging NP Policy PEN5 goes beyond what is set out in the NPPF, the emerging Local Plan policy and standing advice from Natural England and Forestry Commission. Indeed, it is not clear what ‘affect’ constitutes and how this will be measured or enforced. Further clarification on this should be provided. Furthermore, there is no sufficient justification for why the draft policy seeks to enforce a minimum of a 150-metre buffer, when the standing advice from Natural England and Forestry Commission is 15 metres. This is a significance difference in buffer zone distance and can have a significant, serious, and detrimental impact on sustainable development coming forward.</p> <p>3.26 Taking Land at Black Rock as an example, there is ancient woodland to the north of the Site. However, as the accompanying Framework Plan (which has been carefully informed by specialist consultant input on landscape and ecology as well as other technical matters) demonstrates, housing development can still be achieved on the site with an appropriate buffer from the ancient woodland. This is clear evidence that the emerging policy is not reflective of what is reasonably required to ensure protection of ancient woodland. Indeed, this is particularly important in the context that there is currently a significant shortfall in housing provision within the emerging North Somerset Local Plan, where further unnecessary burdens on development would stifle otherwise appropriate and sustainable development.</p> <p>3.27 As set out in the accompanying note from Landmark (ref. p2995/AJC/EBH/GM) a precautionary 150m buffer is far too broad a general rule that does not account for the specific situation of each parcel of ancient woodland. In the example of Weston Big Wood SSSI, intensive arable practices run right up to the ancient woodland boundary, inhibiting any regeneration or growth on that edge, effectively creating an existing 0 m buffer from impacts. Development that includes an appropriate buffer zone has the potential to protect and expand on this woodland edge, creating a variety of habitats and valuable ecotone (i.e., development has the potential to result in a beneficial impact to the ancient woodland rather than an adverse effect).</p> <p>3.28 As such, as drafted the policy will undermine the ability of the draft Local Plan to deliver on its needs going forwards. It is therefore unsound in its present form and should be amended to align with the NPPF, emerging Local</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>Plan Policy and standing advice from Natural England and the Forestry Commission.</p> <p>Biodiversity Value 3.29 The draft policy includes the term ‘biodiversity value’. However, the term is not defined within the NP. As such, there is risk the emerging policy will be applied inconsistently within development proposals. If retained as a policy, we consider that further supporting text should be provided that defines the terms set out in the emerging policy.</p> <p>Green and Blue Infrastructure Report 3.30 The draft Green and Blue Infrastructure Report forms part of the evidence base underpinning the draft policy. The report provides further commentary on the woodland and trees within Portishead.</p> <p>3.31 Notably, at page 19 of the report, it states: “The community of Portishead are keen to protect the Ancient Woodland and would like to see the biggest possible buffer applied to Weston Big Wood”.</p> <p>3.32 However, linked to our comments above, there is no clear evidence underpinning this assertion. It is not clear how the Council has come to this conclusion when there does not seem to be a clear methodology of how that conclusion was reached. Indeed, the responses to the ‘General Neighbourhood Plan Survey (December 2019 – January 2020) contained within the supporting Homes Data Analysis Report (2022), shows that the community did not raise any concerns with protecting the Weston Big Wood from housing development. It is therefore considered the above statement should be removed from the evidence base document.</p> <p>3.33 It is worth noting that the representors have undertaken initial comprehensive technical feasibility work (including work submitted in support of these representations) on Land at Black Rock. This work clearly demonstrates that the site can come forward with no unacceptable environmental impacts, including any unacceptable impacts to landscape or ecology (including impacts to the nearby Weston Big Wood). Indeed, the BNG strategic document submitted in support of these representation (found at Appendix 7) shows that the site can</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>achieve net gains in biodiversity and more recent work by Landmark Practice shows development can enhance the protection of the Ancient Woodland at Weston Big Wood. It is recommended that this technical work is assessed as part of the preparation of the Neighbourhood Plan.</p>	
<p>Bloor Homes South West and Aston & Co UK (Turley)</p>	<p>Turley</p>	<p>3.34 In relation to Tree Canopy Cover, emerging Policy PEN5 states:</p> <p>“Proposals should clearly set out what the future tree canopy coverage of a site will be with a target of 20% of the site area on sites outside of the town centre and greater than 0.5 ha in size.”</p> <p>3.35 We recognise that the wording of the draft policy has been amended slightly with the use of ‘target of 20%’. This allows a degree greater flexibility within future development and is a welcomed change.</p> <p>3.36 However, as raised in the previous representations, we consider that this part of the emerging policy is at odds with emerging NP Policy PEN4 (Biodiversity). Indeed, emerging policy PEN4 refers to a minimum requirement of 10% improvement in Biodiversity Net Gain [BNG]. However, the over provision of one habitat typology can impact on BNG results. As such, a tree canopy cover of 20% of the site area can impact on a Site’s ability to achieve BNG. We therefore consider this part of the draft policy to be unjustified.</p> <p>3.37 Furthermore, there is no clear evidence underpinning the required target of 20% tree canopy coverage. Indeed, it is not clear how the Council has reached this figure. As set out at paragraph 3.38 of the NP and within the Council’s Green and Blue infrastructure Report, “the Urban Forestry and Woodland Advisory Committee Network advise that ‘a minimum standard for tree canopy cover is set for a local area, with evidence showing that 20% is a good aspiration’”. As such, it is clear that the existing guidance sets the 20% canopy cover as an ‘aspiration’. This is an important distinction that seems to have been overlooked within the draft policy.</p> <p>3.38 We therefore consider that the draft policy should either be amended or deleted. If an amendment is the preferred option, we consider the draft policy should encourage tree planting, with a requirement for applications to include information on the proposed approach to tree planting on the site, and to demonstrate how tree planting has</p>	<p>Bloor Homes representation.pdf</p>

Respondent Name	Organisation	Comment	Attachments
		been maximised, whilst ensuring it is appropriate to its character and context, and or part of the delivery of BNG.	

Plan section	Policy PEN6: Designation of Local Green Spaces
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Respondent Name	Organisation	Comment	Attachments
Jones15		All green belt must be protected. if development is required should be on brown field sites. particular importance in areas around weston big wood	
Susan B		It is concerning that more of the fields around Weston Big Wood and in the Gordano Valley are not recognised as local green spaces. Also, could Portishead not adopt the neighbouring Portbury Wharf Nature Reserve?	
Susan B		Although green spaces are essential for residents' well-being, it is important that the areas rich in wildlife are protected from disturbance.	
BRENDA SHYNE		With reference to the Portishead plan I have noticed a proposed green space designation LGS 29. This is of interest to me as a resident at 63 Heron Gardens, my house and drive front onto this area in the cul de sac. I am happy with this proposal but I would like confirmation it would not affect future decisions that may be necessary for flood prevention works. Also I saw in the document a proposal that a footpath be installed linking the cul de sac at Heron Gardens with Wyndham Way, this is a welcome proposal provided it is inside the proposed green	

Respondent Name	Organisation	Comment	Attachments
		<p>space LGS 29. Any footpath that reduced the parking spaces in the existing cul de sac space would cause major parking problems and any narrowing of the space would make reversing into or out of drives impossible.</p>	
<p>Persimmon Homes Severn Valley</p>	<p>Persimmon Homes</p>	<p>LGS26, Sheepway Roundabout Community Orchard: The Company objects to the designation of land at Sheepway Roundabout as Local Green Space, with reference LGS26. From a procedural perspective, the Neighbourhood Plan process has not complied with paragraph 019 of Planning Practice Guidance, which states that landowners should be contacted at an early stage by the qualifying body, which in this case is Portishead Town Council and the Portishead NDP Steering Group. LGS26's entry in Table 2 of the Local Green Space Report incorrectly states that the land is owned by North Somerset Council. While the land is publically adopted highway, it is owned by Ideal Developments Limited, a subsidiary of Persimmon Homes PLC. The Company has received no formal correspondence to date from the qualifying body stating the intent to include LGS26 in the draft Neighbourhood Plan.</p> <p>The Consultation Statement establishes that Persimmon Homes Severn Valley were not consulted on LGS26, with the Company missing from 'Appendix B - List of Consultees Contacted'. The attached email exchange with Portishead Town Council in October 2022 clarifies that the Neighbourhood Plan was always supposed to include LGS26 in the form it is in in this consultation draft and that this has not been consulted on.</p> <p>Table 1A of the Basic Conditions Statements again says that consultation with the community on the Local Green Spaces is included in the evidence base, but this is not the case for LGS26. LGS26 as per the current consultation draft did not exist in the Regulation 14 draft from Spring 2022. The public commentary listed in the supporting documents of the Neighbourhood Plan is disingenuous as it gives the impression that the public were consulted on LGS26 as the land at the Sheepway Roundabout, when LGS26 in the Regulation 14 draft was Black Nore Lighthouse Green Space (which is now listed as LGS25 in the current draft Plan).</p> <p>Moreover, the designation of this land does not comply with the criteria of Local Green Space designations as per national guidance. Paragraph 010 of the PPG on Local Green Spaces states that where land is already designated as Green Belt, it should be considered whether there is any additional benefit to be gained by designating the land</p>	<p>Persimmon Homes Severn Valley.pdf Persimmon Homes Severn Vally PTC email exchange.pdf</p>

Respondent Name	Organisation	Comment	Attachments
		<p>as Local Green Space. The draft Neighbourhood Plan does not propose any additional benefits for the land as a result of LGS designation.</p> <p>Table 1 in the appendix of the Local Green Space Report sets out the comments from North Somerset Council on the proposed Local Green Space designations from the Regulation 14 stage. As explained previously, the LGS numbering from the Regulation 14 consultation does not correspond with the numbering as set out in the current consultation draft. And it is right to highlight here that para 31 states that in preparing and reviewing plans (and that is to say strategic, local and Neighbourhood Plan) that it " ... should be underpinned by relevant and up-to-date evidence'. It goes on to say that it should be "adequate and proportionate, focused tightly on supporting and justifying the policies concerned".</p> <p>North Somerset Council's comments are that LGS1, LGS3, LGSS, LGS11 and LGS12 are all too small for Local Green Space designation as they are under 0.2ha. This must therefore also apply to the currently proposed LGS26, which is 0.04ha in area. The Company supports North Somerset Council's objection to the designation of land of insufficient size.</p> <p>Should the inclusion of LGS26 remain it will unduly affect road or other improvements at a gateway roundabout into Portishead. Its inclusion will compromise opportunities for North Somerset Council to consider future urban expansion options as it continues (at this present time) devising its locational spatial strategy to adequately meet its housing land supply obligations.</p> <p>LGS26 should therefore be deleted or revert to its original mapped area in the previous draft of the Neighbourhood Plan.</p>	
Bloor Homes South West and Aston & Co UK (Turley)	Turley	<p>3.39 The concerns raised in response to Draft Policy PEN6 within our previous representations remain. Indeed, the draft policy remains unchanged and lacks clarity as to what “development which adversely affects a designated Local Green Space” means in practice. At present it is too subjective, and there is a risk separate parties interpret and/or apply the draft policy differently.</p>	Bloor Homes representation.pdf

Respondent Name	Organisation	Comment	Attachments
		3.40 We consider the emerging policy should be amended to ensure it clearly relates to development on the whole or part of a designated Local Green Space only. This would ensure that it is consistent with paragraph 103 of the NPPF that requires policies for Local Green Space to be consistent with those for Green Belt. Green Belt Policy relates to development on designated Green Belt only and not to development on sites adjoining the Green Belt.	
Rebecca Smith		<p>I have just looked at the Green Spaces element of the plan, in particular the areas highlighted in red and green that can and can't be LGS. I am concerned that all the red spaces (ie cannot be LGS) are at the top of Portishead such as the fields behind Merlin Park/fields behind Weston Big Wood/ruined farmhouse/Tower Farm. It states one of the reasons is because they are "extensive". Does this mean they will be developed on in the future? These spaces are very important to residents who live up near the police headquarters. They are full of wildlife and are tranquil areas for family walks, picnics and recreation that are crucial for residents well-being. This was never more evident during lockdown and though this was an unprecedented time these green spaces were, and still are, invaluable. Please do not earmark these spaces for development.</p> <p>Portishead has already seen extensive development over the last 10+ years and it is at bursting point. It really cannot handle any more development especially when new developments would be on the green spaces that make Portishead the place it is. I know I speak for many residents.</p>	Becky Dodd_Redacted.pdf

Plan section	Policy PEN7: Other Green Spaces
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Respondent Name	Organisation	Comment	Attachments
LJB		Neighbourhood enhancement suggestions include opening up Brackenwood with multiple access routes from both Nore Rd and Cabots Rise.	

Respondent Name	Organisation	Comment	Attachments
		<p>Installing an open pipe bike access (similar to the one near the life boat station) down the Admirals Walk steps from Blackdown Park to Nore Road to increase access between the two differing areas of Portishead.</p> <p>Installing a path from the top of the Admirals Walk steps to the Blackdown Road pedestrian alley.</p> <p>Installing stable steps / paths from Nore Road to the Old Golf Course from the gates opposite Frobisher Avenue and Raleigh Rise and consider a pedestrian friendly / bike access route to introduce a shared pedestrian / bike route into town that avoids the narrow pavement along Nore Road .</p> <p>Massive improvement to children's outdoor play areas across Portishead (they are all looking very tired).</p> <p>Overall enhancing the services available to young families, not just the elderly in Portishead (e.g. free or donation only children's centre services, breast feeding safe spaces and additional pre school spaces to allow for working families).</p>	
active		NO MORE HOUSING.	
Cheryl Beech		Protect as once lost to development the community will be affected detrimentally.	Cheryl Beech.docx

Plan section	Policy PEB1: Locally Distinctive, High Quality Design
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Respondent Name	Organisation	Comment	Attachments
active		NO MORE HOUSING.	

Respondent Name	Organisation	Comment	Attachments
Bloor Homes South West and Aston & Co UK (Turley)	Turley	<p>3.41 Draft Policy PEB1 relates to design. We recognise the draft policy has been amended to remove the requirement for a masterplan to be submitted with major proposals. This responds to our previous representations and is a welcomed change.</p> <p>3.42 However, we maintain our concerns with regards to the draft policy’s requirement for all major development to demonstrate how “the proposed development layout, density, access proposals and building design approach complement and extend the positive characteristics of the immediate area, wider settlement and landscape of Portishead”.</p> <p>3.43 We recognise the aims and objectives of the draft policy. It seeks to ensure the design of a scheme relates to the site’s particular surroundings. We do not have any objection to this in principle.</p> <p>3.44 The draft policy applies a blanket approach to every major submission. This is not appropriate or justified. Indeed, the ‘one size fits all approach’ is not reflective of the reality of each major application submission. Clearly each site has different constraints and context. As such, the application submission will correspond to the needs of the site. Furthermore, an application can be considered as ‘major’ based on site size, but the proposals themselves are relatively minor (i.e., elevational upgrades, demolition etc). The requirement of masterplan for all major applications could result in delays with the application submission and undermine the Council’s need to bring development forward to meet local needs.</p> <p>3.45 We consider the draft policy should be amended to the below:</p> <p>“Where appropriate, any proposals for major development must demonstrate how the proposed development layout, density, access proposals and building design approach complement and extend the positive characteristics of the immediate area, wider settlement and landscape of Portishead.”</p>	Bloor Homes representation.pdf
Plan section		Policy PEB2: Small and Infill Development	

Respondent Name	Organisation	Comment	Attachments
active		NO MORE HOUSING.	
Bloor Homes South West and Aston & Co UK (Turley)	Turley	<p>3.46 Draft Policy PEB2 relates to proposals for small and infill development within the settlement boundary of Portishead. The principle of infill development within Portishead is supported.</p> <p>3.47 It is recognised the settlement boundary now aligns with the adopted CS rather than the emerging Local Plan (at figure 11 on page 60) as it excludes the proposed housing allocation on land to the south of Gordano school. This amendment is welcomed.</p> <p>3.48 However, the draft NP does include the emerging settlement boundary (as per the emerging NSLP) at Appendix 3. It includes land south of Clevedon Road/Gordano School. It is considered to be a premature inclusion while the emerging NSLP is still in draft form. Appendix 3 is therefore at odds with introductory paragraph 1.28 of the draft NP. We therefore recommend that Appendix 3 of the emerging NP is removed.</p>	Bloor Homes representation.pdf

Plan section	Policy PEB3: Local Heritage
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Respondent Name	Organisation	Comment	Attachments
active		Portishead has more than enough housing. Our historic buildings are under threat.	
Wessex Water (Ruth Hall)	Wessex Water	Neighbourhood Plan Policy PEB3 Local Heritage identifies non-designated heritage assets (Fig 12) which development proposals will need to take account of. The identified heritage assets include ventilation columns associated with the sewerage infrastructure. Wessex Water reserve the right to undertake works to the columns as required in the future in	Wessex Water.pdf

Respondent Name	Organisation	Comment	Attachments
		order to maintain sewerage services.	
Historic England (David Stuart)	Historic England	I can confirm that there are no issues associated with the Plan upon which we wish to comment.	
Cheryl Beech		Protect Old buildings/historic property from being turned into flats or their features being lost forever.	Cheryl Beech.docx

Plan section	Policy PEB4: Sustainable Design, Construction and Retrofitting
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Respondent Name	Organisation	Comment	Attachments
Susan B		Any new building in the town should be carbon neutral, incorporating solar panels/air or ground source heat pumps or any other 'renewable' technology.	

Plan section	Policy PER1: Supporting Renewable and Low Carbon Energy Schemes in Portishead
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Respondent Name	Organisation	Comment	Attachments
Ian	Mr	The number of properties without solar panels that could have solar panels is shocking - good to see take-up being encouraged.	

Plan section Policy PWC1: Protection of Existing Community Facilities and Infrastructure

Respondent Name	Organisation	Comment	Attachments
KRG22		<p>The plan states « This involves the creation of attractive, safe, walkable environments »</p> <p>1. My first observation is that the Marina is not a safe environment given the lack of railings to stop people falling in to deep water. I have used the marina for exercise for many years and now find the mix of pedestrians, bicycles and runners very dangerous because of the entirely unprotected paving edge next to the water. In places the paving is also uneven causing a trip hazard into water. Sooner or later someone will drown.</p> <p>2. There are no toilet facilities at the marina. It's a very busy area for families to take exercise yet there are no public toilets whatsoever which makes it less and less attractive for those with young children or those of us of an age where access to a toilet is required.</p>	
The Theatres Trust	The Theatres Trust	We are supportive of this policy, which covers Somerset Hall as set out within the identified list of facilities. This is an important social, cultural and community facility for local people which includes theatre provision. We consider the Plan to have met the relevant basic conditions.	
SueM		Portishead Guide 'Hut' building missing under Youth and Other Facilities	
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>	Sport England.pdf

Respondent Name	Organisation	Comment	Attachments
		<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 98 and 99. 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 Playing Fields Policy and Guidance document.</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</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 and implementation of planning policy is the evidence base on which it is founded.</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 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.</p> <p>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.</p> <p>http://www.sportengland.org/planningtoolsandguidance</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>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.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England’s Active Design Guidance: https://www.sportengland.org/activedesign</p>	

Plan section	Policy PWC2: New Community Facilities and Infrastructure
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Respondent Name	Organisation	Comment	Attachments
Ian	Mr	Would be great to see better/extra provision for all of those examples.	

Plan section	Policy PWH1: Protection of Portishead's Existing Housing Stock
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Respondent Name	Organisation	Comment	Attachments
Susan B		No more housing should be allowed until the installation of the railway has been confirmed	
Persimmon Homes Severn Valley	Persimmon Homes	<p>The wording of Policy PWH1 requires revision.</p> <p>In its present form, Policy PWH 1 would mean that a development requiring the demolition of an existing property, even though it would create a net gain in the number of residential properties, could conflict with this Policy.</p> <p>Where it currently says, "Support will not be given to proposals that would result in the loss of existing residential use" this should be revised to state that "Support will not be given to proposals that would result in the net loss of existing residential use".</p>	Persimmon Homes Severn Valley.pdf

Plan section	Policy PWH3: New Housing to Meet Local Needs in Portishead
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Respondent Name	Organisation	Comment	Attachments
active		NO MORE HOUSING.	
Strongvox Homes (Land south of Clevedon Road)		<p>Our client wholly supports the need for affordable housing and will seek to deliver a policy compliant contribution on the proposed North Somerset Local Plan allocation site at Land South of Clevedon Road, Portishead. It is, however, imperative to ensure that the requirements identified in the policy are viable when considered in conjunction with all other contributions sought through the North Somerset Local Plan and Portishead Neighbourhood Plan.</p> <p>As stated, it should also be recognised that the evidence provided by the Portishead Housing Needs Assessment, 2021 whilst useful represents a 'snap-shot' in time. The policy should, therefore, recognise that new more up to date evidence may become available which supersedes this evidence</p> <p>It is therefore recommended that the policy be amended to reflect this matter, as follows (amends in bold):</p> <p>"... Proposals are in conformity with adopted North Somerset Core Strategy Policies CS14; Mixed and Balanced Communities and CS16; Affordable Housing, or subsequent adopted Local Plan Policy where viable, in conformity with North Somerset Local Plan Policy DP42...</p> <p>...All affordable housing provided through developer contribution will be expected to contribute to meeting the specific affordable housing needs of Portishead's community as set out in the Portishead Housing Needs Assessment 2021 or updated evidence upon housing need...</p> <p>...Market housing prioritises the delivery of housing types that contribute to meeting Portishead's specific housing needs as set out in the Portishead Housing Needs Assessment (2021) 2021 or updated evidence upon housing need..."</p>	Strongvox via Pegasus land s of Clevedon Rd.pdf
Persimmon Homes Severn Valley	Persimmon Homes	<p>It is inherently misguided for PWH3 to state that new housing developments that align with Core Strategy Policy CS14 will be supported. At a planning appeal in North Somerset this year (reference APP/D0121/W/21/3285343) Policy CS14 was found to be out-of-date by the Inspector as the adopted Core Strategy does not include "a Framework-compliant assessment of local housing need" and as CS14 distributes this housing need, the Policy is out of date. This view was supported at subsequent appeals this year (references APP/D0121/W/21/3285624 and APP/D0121/W/21/3286677).</p>	Persimmon Homes Severn Valley.pdf

Respondent Name	Organisation	Comment	Attachments
		<p>The first line of Policy PWH3 then states that proposals in conformity with "subsequent adopted Local Plan Policy" will be supported. This is a superfluous addition to PWH3. The North Somerset Council planning officer on any application will have to consider whether the proposals are in conformity with adopted Local Plan Policy. There is no benefit in repeating national policy in a Neighbourhood Plan.</p> <p>It is not necessary for the Neighbourhood Plan to repeat Local Plan Policies or Neighbourhood Plan Policies either through reference to adopted Policies that Planning Inspectors found to be out-of-date or through generic reference to yet to be adopted Policies. The Neighbourhood Plan is being prepared in parallel with an emerging Local Plan where there will be a requirement for the District to meet its housing requirement - something that it has failed to do for an extended period of time; the result of which being a significant shortfall in its 5 year housing land supply. Further, it is necessary for the Policy to recognise through the inclusion of the following wording to bullet 4: "- Market housing prioritises the delivery of housing types that contribute to meeting the District's (delete "<i>Portishead's specific</i>") housing needs and so supporting Portishead's Neighbourhood Plan Vision [amended as per our comments], and .. "</p> <p>Policy PWH3 should not reference the evidence base document, 'Portishead Housing Needs Assessment 2021' in its wording as the Evidence Base Report itself is not subject to any change/modification through the Examination process. It is noted that under the heading in the Neighbourhood Plan 'What is Affordable Housing', First Homes discount levels of 50% are seen as necessary to begin to make such homes affordable. However, such suggested levels of discounting is, first unrealistic and unviable - with an inflationary effect on the cost of delivering market homes and, secondly a reaction to a systemic failure in delivering homes across North Somerset for decades. It is therefore not a proactive reaction to the need to deliver homes in sustainable settlements.</p> <p>Policy PWH3 should be revised accordingly - responding to the evidence upon which it is based.</p>	
Bloor Homes South West	Turley	3.49 We recognise that the draft policy has removed a minimum of 30% affordable housing on schemes of 10 dwellings or more. This is a positive change and is welcomed.	

Respondent Name	Organisation	Comment	Attachments
and Aston & Co UK (Turley)			

Plan section Policy PWH4: Making Housing Available to Local People in Housing Need

Respondent Name	Organisation	Comment	Attachments
Ian	Mr	Good idea.	
Strongvox Homes (Land south of Clevedon Road)		<p>Policy PWH4 sets out that the Town Council will encourage open market, first homes and all other discounted market housing be marketed for the first three months, exclusively to people with a long-term association with Portishead. This policy is not replicated within the North Somerset Local Plan.</p> <p>Whilst the issues relating to the available housing within Portishead are known and understood it must be recognized that this requirement could have implications for the delivery of housing. To ensure that the policy is workable it is important that the 3 month marketing period can commence prior to the completion of the dwelling and be 'off-plan'.</p>	Strongvox via Pegasus lands of Clevedon Rd.pdf

Plan section Policy PWH5: First Homes Discount in Portishead

Respondent Name	Organisation	Comment	Attachments
Ian	Mr	Good idea.	

Respondent Name	Organisation	Comment	Attachments
Strongvox Homes (Land south of Clevedon Road)		<p>This policy seeks to provide an increased discount on First Homes from 30% to 50%. Whilst the rationale for this increased discount is known and understood it is important that it does not prohibit development proposals by making them unviable. It is noted that neither the plan nor North Somerset Local Plan is supported by an appropriate whole plan viability assessment at this stage. This should be addressed prior to examination, ideally via an all-encompassing study by North Somerset Council.</p> <p>The inclusion of the increased discount adds greater weight to our point on viability in relation to draft policy PWH3 above.</p>	Strongvox via Pegasus lands of Clevedon Rd.pdf

Plan section	Policy PWH9: Community Led Development Projects
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Respondent Name	Organisation	Comment	Attachments
active		The community must always be at the heart of all consultations.	

Plan section	Policy PWH10: Self Build and Custom Build Housing
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Respondent Name	Organisation	Comment	Attachments
active		NO MORE HOUSING.	
Bloor Homes South West and Aston & Co UK	Turley	<p>3.50 Draft Policy PWH10 states:</p> <p>“On allocated development sites, proposals for development of 50 homes or more, 5%, or 3 dwellings of the total</p>	Bloor Homes representation.pdf

Respondent Name	Organisation	Comment	Attachments
(Turley)		<p>homes should be made available for sale as self-build or custom house building plots. For phased developments, self-build plots must be delivered and serviced at the earliest stage possible”.</p> <p>3.51 The need for a variety (mix) of new housing is supported.</p> <p>3.52 However, we maintain the concerns raised with this draft policy as per our previous representations. It is noted that emerging Local Plan Policy DP46 (Homes for All) is triggered at 100 homes or more. NP Draft Policy PWH10 relates to allocated development sites. However, the draft NP Policy is not accompanied with sufficient evidence base to support a reduced trigger of 50 homes rather than a 100. We consider that draft Policy PWH10 should be amended to ensure it aligns with emerging Local Plan Policy, once tested for Soundness at Examination.</p> <p>3.53 Notwithstanding this, we also consider that the draft policy should take a flexible rather than prescriptive approach. Further evidence around need, and viability should be presented to support the requirements for self and custom build housing being proposed by the policy and which is to apply in a blanket way across allocated development sites of 50 homes or more. The interaction of this policy with policies on affordable housing should also be clarified.</p>	

Plan section	Prosperity Introduction
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Respondent Name	Organisation	Comment	Attachments
		<p>Phoenix Life Ltd (Phoenix Life) is the owner of the Old Mill Employment Area and the Wyndham Way Retail Park in Portishead town centre. These operational assets are managed by Abrdn.</p> <p>Phoenix Life’s assets form part of the identified Wyndham Way Study Area project and Abrdn has been actively involved, working together with North Somerset Council and Portishead Town Council, on delivering a new Masterplan</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>for this key regeneration area.</p> <p>As a major landowner in Central Portishead, Phoenix Life is fully supportive of the overall Vision for the Wyndham Way Study Area, which is to create a sustainable, connected district which helps to join up the different parts of Portishead and provide a mix of homes, jobs, green space and facilities which makes it an attractive part of the town.</p> <p>This opportunity is recognised in the draft Portishead Neighbourhood Plan, on which Phoenix Life has the following comments to make.</p> <p>Phoenix Life Ltd notes the introduction to the Economy section states that commerce is focussed on a small number of sites including a reference to Old Mill Road. Para 5.3 notes that in recent years numerous sites have been turned from commercial to residential despite demand for commercial premises. Reference is made at para 5.4 to “An attempt through a Planning Application to turn one of the last remaining commercial areas (Old Mill Road) into residential and retail led to a huge public outcry and three public demonstrations. Eventually the application was withdrawn.”</p> <p>Phoenix Life Ltd queries the need to make a reference to a specific, and now historic, planning application, which was withdrawn over 2 years ago, when the Neighbourhood Plan should be looking forward, not backwards, and making positive policy based provisions for the future of Portishead.</p> <p>Phoenix Life Ltd queries the evidence base to back up the statement in para 5.5 of the Neighbourhood Plan that there is a lack of available commercial land within the settlement boundary. Whilst it is acknowledged that the Neighbourhood Plan is based on policies and provisions of the adopted Core Strategy and Local Plan, up to date evidence (West of England Employment Land and Spatial Needs Assessment (ELSNA: 2021)) has informed the draft North Somerset Local Plan at Policy SP9 to make provision for 70 ha of employment land to meet the identified needs. This includes existing and new allocations. The draft Local Plan provides for more land than is needed in order to offset any loss of existing business premises including the gradual replacement of unsuitable premises with more modern buildings.</p> <p>Therefore, the underlying premise of draft Policy SP9 is to seek to provide for identified needs, create opportunities for new businesses and the replacement of outdated facilities. There is no specific reference in the policy to the need to</p>	

Respondent Name	Organisation	Comment	Attachments
		protect existing employment uses, which is the suggested policy approach set out in the Neighbourhood Plan. Whilst draft Policy SP9 is not currently the basis for the policies contained in the Neighbourhood Plan it reflects the current evidence base and does not seek to specifically protect existing employment uses or space.	

Plan section	Policy PPE1: Protecting Portishead's Valued Employment Space
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Respondent Name	Organisation	Comment	Attachments
active		It is essential to maintain employment land for all the reasons previously stated.	
Persimmon Homes Severn Valley	Persimmon Homes	Insufficient evidence is presented with this Neighbourhood Plan to justify the wording to the policy. Any reliance on the Wyndham Way Study document (and its supporting evidence) means that it should have accompanied the evidence base for the Neighbourhood Plan up until 18 November 2022. Contributors to this consultation period are likely to have been compromised by their inability to reference the Wyndham Way submissions and vice versa.	Persimmon Homes Severn Valley.pdf
Phoenix Life (Tulley Bunting)	.	Draft Policy PPE1 references “Valued Employment Sites” (marked in the draft Neighbourhood Plan as Figure 13) which includes the whole of Portishead Town Centre as well as other sites marked in red. The Policy states: At ‘Valued Employment Sites’ within Portishead, listed in Figure 13, development proposals that retain, restore or increase employment levels within use classes E(g), B2 or B8, will be supported in principle subject to compliance with other relevant policies within the development plan in relation to development that changes the character or appearance	Phoenix Life Ltd.pdf

Respondent Name	Organisation	Comment	Attachments
		<p>of the proposal land or buildings.</p> <p>Phoenix Life Ltd queries the justification for including the whole of the town centre as a valued employment site, where in fact there is only one allocated employment site at Gordano Gate. The town centre contains a variety of uses and Phoenix Life does not consider there is any justification for identifying the whole town centre as a Valued Employment Site.</p> <p>The Neighbourhood Plan contains several inconsistencies in its references to seeking to protect existing employment uses within Portishead town centre.</p> <ul style="list-style-type: none"> • Policy PPE1 itself is inconsistent in that it is entitled “Protecting Portishead’s Valued Employment Space, whereas the policy itself refers that proposals that retain, restore or increase employment levels will be supported. • Para 5.17 refers to protecting existing opportunities for employment. The same paragraph states that Policy PPE1 will add protection for identified valued places of local employment. • Para 5.25 refers to protecting existing employment. • Para 6.8 references existing employment and retail uses and that proposals that may come forward for these sites will only be supported where these uses and employment are retained. • Bullet point 2 of Objective O12 refers to ensuring the ongoing viability of existing valued employment and town centre retail uses within the study area is protected. <p>There is no consistency in terms of how existing employment and retail uses are referred to which creates uncertainty in terms of how the policies and objectives contained within the Neighbourhood Plan are to be applied.</p> <p>Phoenix Life considers that there should be consistency in terms of the Plan’s references to its objective in supporting development proposals that seek to retain, restore or increase employment levels, as currently proposed in Policy PPE1 but this should not be construed to assume it seeks to protect existing employment space or places. Nor should there be any references to protecting the viability of existing valued employment. The emphasis should be on creating opportunities for new employment development rather than seeking to protect specific existing space/places or businesses.</p>	

Respondent Name	Organisation	Comment	Attachments
		Phoenix Life has expressed concern in previous representations on the Reg 14 version of the Neighbourhood Plan that the Neighbourhood Plan is seeking to protect specific existing employment spaces/places and/or businesses, which is not the function of the planning system. Whilst protecting land uses can form part of planning policy such an approach needs to be fully justified and set in the context of the wider objectives of any Plan. The terminology should also be entirely consistent throughout the Plan.	

Plan section	Policy PPE2: Supporting Business Investment, Start-ups and Low Carbon Business Enterprise
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Respondent Name	Organisation	Comment	Attachments
Preton Development Ltd (Rapleys)		<p>Whilst the overriding objective to support Portishead's economy and local employment is acknowledged and supported, there must be a clear understanding of the impact of policy and how it can stymie or negate other forms of development unnecessarily if it is not applied flexibly.</p> <p>The current wording of the policy is considered to be inadequate as it fails to consider the evidenced demand for such employment uses during the plan period and how this could unreasonably prevent residential development, affordable housing delivery or other relevant uses on sites capable of delivering it, in favour of employment floorspace of which there is no demand for.</p> <p>Accordingly, the scope of the policy needs to include reference to evidence and demand for the new employment development, as to not produce undesirable vacant commercial space and thereby the unnecessary curtailment of residential delivery or other opportunities.</p> <p>Such revised wording would provide an extra layer of flexibility to the policy while still providing a presumption in favour of development for new employment development when there is demand for such a use, addressing the aspirations of the Neighbourhood Plan and respecting the thrust of local and national policy. Such an amended</p>	Portishead Neighbourhood Plan Policy Submission Representations 16-11-22.pdf

Respondent Name	Organisation	Comment	Attachments
		<p>policy is also considered to be representative of how other LPAs support and manage similar policy throughout the planning system.</p> <p>We would therefore welcome further discussion on the wording of Policy PPE2 and whether it is suitable in its current form.</p>	

Plan section	Policy PPT1: Inclusive Active Travel
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Respondent Name	Organisation	Comment	Attachments
active		We need an integrated transport system NOW!	
Linda Day		<p>I have read the neighbourhood plan and am concerned there is little mention of the proposed reopening of the railway line or the current scrapping of bus routes serving Portishead.</p> <p>Not sure if this is in the scope of the plan but is of great concern to me being someone who is no longer able to drive due to health issues and who has some mobility issues.</p> <p>The scrapping of the X3 that served the Marina area has seriously affected me as I now have to catch the 57 bus into town and then change to get into Bristol. Plus the 57 is only 2 hourly Monday to Saturday and times do not always work for things like Doctors appointments or school pickups for the grandchildren. There is also no evening service so any opportunity to go out in the evening is now very difficult for me.</p> <p>Plus now the X5 only goes Weston to Portishead meaning there is no way to connect to services in Avonmouth to get to Cribbs Causeway, Parkway Station or Southmead Hospital without going into and back</p>	Linda Day_Redacted.pdf

Respondent Name	Organisation	Comment	Attachments
		<p>out of Bristol centre, a long journey!</p> <p>Recently the buses have also been quite unreliable due to Driver shortages adding to the difficulty for people such as myself. I have had to walk home (far end of Marina) with shopping on a number of occasions due to no bus.</p> <p>As a town committed to a greener lifestyle good public transport links via train and buses should be high on the towns agenda yet the plan seems more focused on cars (albeit electric) .</p>	
Jacqueline W		<p>I do not think I will be driving in a few years time and like many of our acquaintances we are going to be trapped here, cut off from getting out of Portishead until such a time as the station is built. Get the station up and running first I think. This will cut traffic pollution.</p> <p>Portishead will be an area over pollution by the constant building of homes and cars, most families owning two electric vehicles just to get to work in Bristol and surrounding areas....Public transport is all but none existent.... The M5 is the road that we all queue to get out on in the morning and evening pumping even more fumes into the atmosphere.... The train is desperately needed for all our health sakes....</p>	
National Highways	National Highways	<p>Thank you for providing National Highways with the opportunity to comment on the consultation version of the Portishead Neighbourhood Plan. As you will be aware, National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance comprises the M5 mainline with M5 Junction 19 just outside of the plan area.</p> <p>In general terms, we welcome polices PPT1-6, which include aims to minimise traffic congestion and to encourage different modes of travel to the private vehicle, including active travel (E.g. walking and cycling) and public transport. As well as associated environmental and health benefits, such measures can help reduce</p>	National Highways_Redacted.pdf

Respondent Name	Organisation	Comment	Attachments
		pressure on the SRN and help ensure its safe and efficient operation. We have noted your proposed policies and are satisfied that they are unlikely to lead to development which will have a significant impact on the SRN.	
Cheryl Beech		<p>Transport</p> <p>Very important to place the station in a space where buses can support access to/from it and remove need for car travel from hilly areas of Portishead or distance from the train station please.</p> <p>Bus/train link</p> <p>Field between Portbury 100 and road adjacent to The Vale/Railway Bridge. Car park/buses to carry 1000 people to/from trains. This is a town with many workers travelling out/back to work (in Bristol/other areas too) it is no longer a village needing 50 parking spaces (as provided near Waitrose).</p> <p>Buses Clevedon to Portishead</p> <p>Add to train users and remove cars from roads driving further distances in to Bristol</p>	Cheryl Beech.docx
Persimmon Homes Severn Valley	Persimmon Homes	<p>In the context of current public transport service cuts, it would be appropriate for Policy PPT1 to be worded more positively - recognising that new development could support the reactivation of bus stops and services. Bullet 2 should therefore be reworded to state:</p> <p>- integrate with public transport services and achieve accessible and safe pedestrian connections of no more than 400m or 5 minutes safe and convenient walking distance to an active bus stop - or help to support the re-activation of an inactive bus stop and service.</p>	Persimmon Homes Severn Valley.pdf
Bloor Homes South West	Turley	3.54 Emerging Policy PPT1 supports development proposals where they contribute proportionately and	Bloor Homes representation.pdf Appendix 5 - Portishead

Respondent Name	Organisation	Comment	Attachments
and Aston & Co UK (Turley)		<p>positively towards Portishead’s active and sustainable transport network. We continue to support this draft policy.</p> <p>3.55 As we noted in the representations to the emerging Local Plan, the allocation of land at Black Rock provides a unique and valuable opportunity to facilitate the delivery of the Clevedon to Portishead Greenway cycle route as specifically referenced within emerging Policy PPT2.</p> <p>3.56 The accompanying Vision Document and Framework Plan demonstrates how the Greenway cycle route can be provided along the northern and southern boundaries of the site. This will further enhance accessibility within both the Proposal Site and Portishead. There is potential to connect the coastal town route to the new station at Portishead and encourage active travel. The new rail link is part of the West of England Combined Authority’s [WECA’s] strategic transport plan which the Secretary of State for Transport has recently granted.</p> <p>3.57 The WECA metro West project will provide a step change in sustainable travel options. As set out on the WECA website, “the local rail network will see half-hourly services across most of its lines, including through central Bristol. The project could generate over a million new rail journeys and give 80,000 more people access to train services. MetroWest will reopen two lines and up to seven new stations between 2021 and 2024. Beyond 2024 there are plans to increase the frequency of services on key routes and open more stations.”</p> <p>3.58 We therefore support Emerging Policy PPT1.</p>	<p>NP - Land at Black Rock - Vision Document Booklet.pdf</p>
Plan section		Policy PPT2: Encouraging Active Travel for Leisure and Recreation	

Respondent Name	Organisation	Comment	Attachments
Elaine Bowman	North Somerset Council	Please use correct title . You have called it the South West Coastal Path. Correct title is England Coastal Path.	
Susan B		<i>Please</i> can any cycle lanes be kept separate from pedestrian paths	
National Highways	National Highways	<p>Thank you for providing National Highways with the opportunity to comment on the consultation version of the Portishead Neighbourhood Plan. As you will be aware, National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance comprises the M5 mainline with M5 Junction 19 just outside of the plan area.</p> <p>In general terms, we welcome polices PPT1-6, which include aims to minimise traffic congestion and to encourage different modes of travel to the private vehicle, including active travel (E.g. walking and cycling) and public transport. As well as associated environmental and health benefits, such measures can help reduce pressure on the SRN and help ensure its safe and efficient operation. We have noted your proposed policies and are satisfied that they are unlikely to lead to development which will have a significant impact on the SRN.</p>	National Highways_Redacted.pdf

Plan section	Policy PPT3: Supporting the Shift to Ultra Low Emission Vehicles
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Respondent Name	Organisation	Comment	Attachments
Ian	Mr	We will definitely need more EV charging points, so this is good to see.	

Respondent Name	Organisation	Comment	Attachments
National Highways	National Highways	<p>Thank you for providing National Highways with the opportunity to comment on the consultation version of the Portishead Neighbourhood Plan. As you will be aware, National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance comprises the M5 mainline with M5 Junction 19 just outside of the plan area.</p> <p>In general terms, we welcome polices PPT1-6, which include aims to minimise traffic congestion and to encourage different modes of travel to the private vehicle, including active travel (E.g. walking and cycling) and public transport. As well as associated environmental and health benefits, such measures can help reduce pressure on the SRN and help ensure its safe and efficient operation. We have noted your proposed policies and are satisfied that they are unlikely to lead to development which will have a significant impact on the SRN.</p>	National Highways_Redacted.pdf

Plan section	Policy PPT4: Parking
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Respondent Name	Organisation	Comment	Attachments
National Highways	National Highways	<p>Thank you for providing National Highways with the opportunity to comment on the consultation version of the Portishead Neighbourhood Plan. As you will be aware, National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance comprises the M5 mainline with M5 Junction 19 just outside of the plan area.</p> <p>In general terms, we welcome polices PPT1-6, which include aims to minimise traffic congestion and to encourage different modes of travel to the private vehicle, including active travel (E.g. walking and cycling) and public transport. As well as associated environmental and health benefits, such measures can help reduce pressure on the SRN and help ensure its safe and efficient operation. We have noted your proposed policies and are satisfied that they are unlikely to lead to development which will have a significant impact on the</p>	National Highways_Redacted.pdf

Respondent Name	Organisation	Comment	Attachments
		SRN.	
Persimmon Homes Severn Valley	Persimmon Homes	It is not necessary for the Neighbourhood Plan to provide a policy that repeats the North Somerset Council Parking Standards SPD. This Policy is superfluous should be removed from the Neighbourhood Plan.	Persimmon Homes Severn Valley.pdf

Plan section	Policy PPT5: Highways Impacts and Securing Highway Safety
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Respondent Name	Organisation	Comment	Attachments
National Highways	National Highways	<p>Thank you for providing National Highways with the opportunity to comment on the consultation version of the Portishead Neighbourhood Plan. As you will be aware, National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance comprises the M5 mainline with M5 Junction 19 just outside of the plan area.</p> <p>In general terms, we welcome policies PPT1-6, which include aims to minimise traffic congestion and to encourage different modes of travel to the private vehicle, including active travel (E.g. walking and cycling) and public transport. As well as associated environmental and health benefits, such measures can help reduce pressure on the SRN and help ensure its safe and efficient operation. We have noted your proposed policies and are satisfied that they are unlikely to lead to development which will have a significant impact on the SRN.</p>	National Highways_Redacted.pdf

Plan section	Policy PPT6: Development Proposals and Travel Planning
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Respondent Name	Organisation	Comment	Attachments
active		NO MORE HOUSING.	
National Highways	National Highways	<p>Thank you for providing National Highways with the opportunity to comment on the consultation version of the Portishead Neighbourhood Plan. As you will be aware, National Highways is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance comprises the M5 mainline with M5 Junction 19 just outside of the plan area.</p> <p>In general terms, we welcome polices PPT1-6, which include aims to minimise traffic congestion and to encourage different modes of travel to the private vehicle, including active travel (E.g. walking and cycling) and public transport. As well as associated environmental and health benefits, such measures can help reduce pressure on the SRN and help ensure its safe and efficient operation. We have noted your proposed policies and are satisfied that they are unlikely to lead to development which will have a significant impact on the SRN.</p>	National Highways_Redacted.pdf

Plan section	Introduction
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Respondent Name	Organisation	Comment	Attachments
active		NO HOUSING on WYNDHAM WAY or ANYWHERE in PORTISHEAD.	

Plan section	Wyndham Way Study Area
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Respondent Name	Organisation	Comment	Attachments
active		NO HOUSING.	
Phoenix Life (Tulley Bunting)		<p data-bbox="521 443 1592 475">AREA BASED POLICIES – PRIORITIES FOR THE WYNDHAM WAY STUDY AREA</p> <p data-bbox="521 512 1872 580">The Neighbourhood Plan now sets out priorities for the Wyndham Way Study Area (WWSA) rather than including a specific policy for the area. No justification is provided regarding the decision to drop the previous draft Policy.</p> <p data-bbox="521 617 1883 754">Notwithstanding this, Phoenix Life welcomes the Neighbourhood Plan’s support for the principle of the development of the WWSA recognising that “it could help to unlock potential wider benefits such as new routes and connections or improved use of previously developed, ‘brownfield’, land.” (para 6.6). The draft Neighbourhood Plan also acknowledges the allocation of the Old Mill Road site for mixed use development.</p> <p data-bbox="521 791 1877 928">The Neighbourhood Plan at para. 6.8 notes that “The study area contains existing employment and retail uses that make an existing contribution to the value and offer of the town centre and local employment opportunities. These valued uses are protected by Neighbourhood Plan town centre and employment policies PTC1 and PPE1. Proposals that may come forward for these sites will only be supported where these uses and employment are retained. “</p> <p data-bbox="521 965 1823 1034">Phoenix Life does not agree that Policies PTC1 and PPE1 specifically seek to protect existing employment and retail uses within the WWSA.</p> <p data-bbox="521 1038 1883 1176">Policy PTC1 relates to the whole town centre and seeks to protect Portishead’s town centre character and vitality. In bullet point 3 there is reference to the need to “Protect or increase the viability and quality of retailing, commercial and community service ground floor frontages, and the vitality of the evening economy”. This is not the same as seeking to protect existing employment and retail uses within the area.</p> <p data-bbox="521 1212 1877 1316">Policy PPE1, as referenced above, also seeks to support proposals that retain, restore or increase employment levels as opposed to existing employment and retail uses, albeit, on which we have previously commented, there is an inconsistency in the title to the policy which refers to valued employment space.</p> <p data-bbox="521 1321 1823 1356">There is no justification for stating in the supporting text at para 6.8 that “Proposals that may come forward for</p>	<p data-bbox="1899 411 2056 480">Phoenix Life Ltd.pdf</p>

Respondent Name	Organisation	Comment	Attachments
		<p>these sites will only be supported where these uses and employment are retained.” The approach seeks to protect all existing employment and retail uses across the Study Area from redevelopment unless they are retained within any scheme. This requirement will severely hinder the ability to bring forward sites for redevelopment.</p> <p>Para 6.8 should therefore be amended to reflect the basis for Policies PTC1 and PPE1 and reference to protecting existing uses and employment should be omitted.</p> <p>Whilst now not forming a policy in the Neighbourhood Plan the guidance set out in Objective O12 retains an unjustified protectionist approach towards existing employment and town centre uses. Bullet point 2 of the matters to have regard to in relation to future plans for the WWSA references “Ensuring the ongoing viability of existing valued employment and town centre retail uses within the study area is protected”. We have commented on the terminology elsewhere in the representations.</p> <p>The objective also suggests that any development should be “employment led”, whereas the WWSA provides a significant opportunity to deliver to create a sustainable, connected district which helps to join up the different parts of Portishead and provide a mix of homes, jobs, green space and facilities.</p> <p>The Neighbourhood Plan should specifically recognise that the WWSA provides a specific opportunity to deliver new housing development on brownfield land in a sustainable central location and that not all development will be employment led.</p> <p>In seeking to protect existing employment uses within the regeneration area, Objective O12 runs against the objectives and policies set out in the Neighbourhood Plan in relation to climate change, sustainability, housing and economy by:</p> <ul style="list-style-type: none"> • Perpetuating the retention of vehicle generating businesses within a town centre location, rather than encouraging commercial activity in better served allocated employment areas. (Policies PPT1 and PPT3) • hindering the opportunity to deliver new employment opportunities and smaller start-up businesses in a highly sustainable location. (Policy PPE2) • Hindering opportunities to deliver new low carbon employment opportunities in accordance with the Climate 	

Respondent Name	Organisation	Comment	Attachments
		<p>Emergency Plan. (Policy PPE3)</p> <ul style="list-style-type: none"> • hindering the opportunity to meet local housing needs in a sustainable location by prejudicing the delivery of new residential opportunities within the WWSA which is a sustainable town centre location, well served by existing services and public transport. (Policies PWH3, PWH4 and PWH5) • resulting in more land needing to be allocated for housing in other less sustainable locations, including potentially in the Green Belt, because of the inability to deliver housing on the Old Mill Road site or indeed any other site within the WWSA. • Hindering the opportunity to deliver improved green and blue infrastructure in the area or the creation of new linkages/permeability from the town centre to the Marina, the new train station and residential areas to the east. (Policies PEB1, PEB4 and PEN2) • Hindering the opportunity to deliver new community facilities as part of new development within the WWSA. (Policy PWC2) <p>The Neighbourhood Plan is thus entirely inconsistent in its policy making. On one hand it supports the redevelopment of the WWSA but on the other hand it seeks to protect all existing employment and town centre uses thus undermining the whole premise of regeneration of this important brownfield regeneration area. Whilst protecting land uses can form part of planning policy, in seeking to protect existing employment uses, the approach set out in the Neighbourhood Plan would impact on several landowners within the WWSA area and could severely hinder development and regeneration taking place.</p> <p>Instead the Neighbourhood Plan should positively seek to secure the delivery of appropriate commercial and employment generating uses as part of mixed use development schemes which meet regeneration and sustainability objectives. The Neighbourhood Plan should encourage proposals for new employment development on sites within the WWSA, as part of mixed use schemes, especially those that create high quality employment and local business opportunities, including low carbon and start-up businesses.</p> <p>The Neighbourhood Plan Objective O12 does not meet the tests of soundness set out in the NPPF at para 35 on the basis that it is not:</p> <ul style="list-style-type: none"> • positively prepared or effective; rather it will hinder redevelopment and regeneration and thus not meet the 	

Respondent Name	Organisation	Comment	Attachments
		<p>objectives of other policies set out in the Neighbourhood Plan which seek to promote sustainable development in areas well served by services and public transport (including within the WWSA)</p> <ul style="list-style-type: none"> • justified as it is not based on evidence to support the approach; indeed, current evidence suggests that there is an overprovision of employment land within North Somerset • deliverable as the proposed protection of existing employment space will hinder regeneration of the WWSA which is a key objective of the Neighbourhood Plan. <p>The Neighbourhood Plan Objective O12 does not meet the tests of soundness set out in the NPPF at para 35 on the basis that it is not:</p>	
<p>Bloor Homes South West and Aston & Co UK (Turley)</p>	<p>Turley</p>	<p>3.59 The draft NP confirms the Town Council will continue to work in partnership with North Somerset Council and landowners to progress future plans for the Wyndham Way Study Area (page 130).</p> <p>3.60 We recommend that careful consideration needs to be given to the promotion of the Wyndham Way Study Area.</p> <p>3.61 Indeed, consideration needs to be given to the promotion of the Wyndham Way Study Area (currently considered at page 130 of the draft NP). At present, a portion of the Site is a protected employment allocation (Gordano Gate). As the NP needs to be in accordance with the currently adopted Development Plan, careful consideration needs to be had regarding how the Wyndham Way Study Area is presented within the NP.</p> <p>3.62 Notwithstanding this, as the Wyndham Way Draft Masterplan demonstrated, there are 58 different landowners within the study area. This is clearly a significant number when seeking to prepare a framework for how redevelopment can come forward. Indeed, the number of different landowners has the potential to prevent or slow delivery of proposals coming forward, with the potential that any development that does come forward is fragmented and does not address infrastructure delivery across the Masterplan area or wider town.</p> <p>3.63 It is also noted that members of the public and Town Council has previously objected to loss of employment land within the masterplan area previously. Application 18/P/3591/OUT sought outline permission for the</p>	<p>Bloor Homes representation.pdf</p>

Respondent Name	Organisation	Comment	Attachments
		<p>redevelopment of land within the masterplan area for a mix of uses, including employment generated uses and dwellings. However, during the consideration of the application, 434 objections were lodged. A prominent focus within these objections (including from the Town Council) were in regard to the loss of employment land and provision of housing. As such, it is unclear how development proposals can come forward in a cohesive and complementary manner in this area to meet local needs.</p> <p>3.64 Furthermore, the Employment and Business Survey Analysis (NP Evidence Base Document) confirms existing residents of Portishead want the NP to drive focus on town centre vitality, protecting existing employment land.</p> <p>3.65 It is also noted the masterplan area is largely within Flood Zone 3, according to the Environment Agency Flood Maps. As such, any future re-development will need to respond to the existing environmental constraints. The NP should reflect the requirements of the National Planning Policy Framework (para 159) and stipulate that any future re-development is safe for its lifetime without increasing flood risk elsewhere.</p> <p>3.66 As such, careful consideration needs to be given to the Wyndham Way Study Area if it is brought forward for housing, given the number of landowners, previous number of public objections (incl. the Town Council), the NP evidence base pointing towards residents seeking to protect existing employment land, and the fact the area largely lies within Flood Zone 3 (particularly in the context of a declared Climate Emergency).</p>	

Plan section	Policy PTC1: Protection of Portishead Town Centre Character and Viability
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Respondent Name	Organisation	Comment	Attachments
Cheryl Beech		<p>Keep shops at Wyndham Way Light industry/shops and not to be sacrificed for housing please keep its current use.</p>	Cheryl Beech.docx

Plan section	PTC3: Town Centre Housing
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Respondent Name	Organisation	Comment	Attachments
active		NO MORE HOUSING.	

Plan section	Appendix 3: Proposed Portishead Settlement Boundary (Emerging North Somerset Local Plan)
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Respondent Name	Organisation	Comment	Attachments
Susan B		I find this map rather disturbing. Does it mean that NSC would consider building on Kilkenny fields and SE of the road in North Weston? I would strongly object to both of those ideas.	

Plan section	Bibliography
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Respondent Name	Organisation	Comment	Attachments
active		Portishead has changed. Whilst it is appreciated that affordable housing is desirable the reality is that housing developers want to build executive houses in Portishead. We don't want any more.	
SueM		Agree with all the above documentation.	

Plan section	Site allocation submissions
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Respondent Name	Organisation	Comment	Attachments
Strongvox Homes (Land south of Clevedon Road)		<p>to Regulation 16 of the Portishead Neighborhood Plan. Strongvox homes are promoting a draft allocation for residential development within the emerging North Somerset Local plan. The proposed residential allocation is submitted with regard to Land South of Clevedon Road, Portishead. A site plan is included in figure 1 (see attached document). It is noted that representations were previously submitted with regard to Regulation 14 of the Portishead Neighborhood Plan, date May 2022.</p> <p>As per previous representations, our client is supportive of the neighborhood plan process and is keen to ensure, and not otherwise hinder, that the neighborhood plan is successfully 'made' post examination and referendum. The proposed allocation site is located adjacent to the existing built-up-area, with a mixture of residential development, agricultural buildings and a cemetery comprising development to the north, east and west. The site is located within close proximity to the high street, which comprises a wide range of shops, services and other amenities. In addition, other notable amenities that are closely related to the application site, and within reasonable walking distance, include the Gordano School and Middle Bridge Business Park. The site benefits from the provision of existing bus stops which provide connection to Portishead town centre, Pill/Easton-in-Gordano and Bristol (X4/X3). It is also noted that the 88 bus service is a less frequent route which provides connection to Clevedon and Nailsea, which can also be accessed from the site.</p> <p>The site is relatively unconstrained by any significant ecological or landscape constraint, and the site is located within a sustainable location.</p> <p>Proposals</p> <p>The proposals represent an accessible and sustainable location for development, that would assist in meeting the Local Planning Authorities current housing need (the most up-to-date housing need is taken from Portishead Neighbourhood Plan Housing Needs Assessment (November 2021) which prescribes a prorated requirement of 461 dwellings, over the plan period of 2021 to 2038). It should be considered that by allocating land for residential development this would enable the Town Council to exercise a higher degree of control, for example through a masterplanning process or via specific site requirements with appropriate viability testing. In addition to a greater ability of control upon development, the lack of proposed allocations for housing subsequently means that the Neighbourhood Plan does not satisfy paragraph 14 b.) of the National Planning Policy</p>	Strongvox via Pegasus land s of Clevedon Rd.pdf

Respondent Name	Organisation	Comment	Attachments
		<p>Framework (updated 2021) which states;</p> <p>"In situations where the presumption (at paragraph 11d) ... [i.e. the titled balance] ... applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply ...</p> <p>... a) the neighbourhood plan became part of the development plan two years or less before the date on which the decision is made; ...</p> <p>... b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement ..."</p> <p>Being able to satisfy para 14 of the NPPF (2021) is particularly relevant in an Authority with a current, and historic, shortfall in the delivery of housing regarding five-year housing land supply (the latest North Somerset Housing Land Supply position, dated April 2021, notes a supply equivalent to 4.8 years). If the Neighbourhood Plan were to meet this requirement, the following criteria are also noted of Para 14:</p> <p>"... c) the local planning authority has at least a three year supply of deliverable housing sites (against its five year housing supply requirement, including the appropriate buffer as set out in paragraph 74); and</p> <p>... d) the local planning authority's housing delivery was at least 45% of that required over the previous three years."</p> <p>If the Neighborhood Plan were to satisfy Para 14.b this would therefore mean that the Local Planning Authority would only be required to demonstrate a 3-year supply of homes, rather than the 5-year supply as required by Para 11 d. of the NPPF (2021); which would therefore provide significantly more protection with regard to speculative applications.</p> <p>The allocation of housing sites would additionally support the NPPF objective, as set out in para 60., of significantly boosting the supply of homes.</p> <p>It is noted that North Somerset Council allocate sites for development as per the adopted Sites and Policies Plan,</p>	

Respondent Name	Organisation	Comment	Attachments
		<p>Part 2 Site Allocations Plan (April 2018). The Neighborhood Development plan notes that, adjacent to the proposed Local Green Space (ref: LGS2), the Part 2 Allocation Plan (2018) allocates residential development of 23 units for 'Land South of Downside', of which is yet to secure planning permission. The lack of the allocation's delivery, since its adoption in 2018, raises questions about the deliverability of the site as a whole.</p> <p>Whilst it is noted that Portishead over the past 20 years has seen significant growth, the number of housing sites with permission granted (especially within the past calendar year) is relatively low. It is therefore essential that this site is brought forwards as soon as possible.</p> <p>The allocation of our clients site for development, subject to agreement, may help to secure benefits to the local community that have not been secured by alternate allocations (such as the aforementioned) that have yet, and are uncertain to, secure planning permission.</p> <p>Subject to negotiation and agreement between parties, the applicant is keen to work alongside the community to identify and secure appropriate amenities.</p> <p>In the eventuality that the Town Council is not prepared to allocate the site for development, it may be deemed appropriate to revise the settlement boundary as to include the site within the settlement limits, as to award some potential for development. By relaxing the settlement boundary this would provide flexibility to enable appropriate development to be brought forwards.</p>	
Bloor Homes South West and Aston & Co UK (Turley)	Turley	<p>1. Introduction and Background</p> <p>Introduction</p> <p>1.1 On behalf of our client Bloor Homes South West Ltd and Aston & Co UK Ltd [the</p>	<p>Appendix 6 - Land at Black Rock - Portishead SHLAA Landscape Sites Review.pdf</p>

Respondent Name	Organisation	Comment	Attachments
		<p>‘Representors’], we write to provide representations to Portishead Town Council [the ‘Town Council’], in relation to the Portishead Neighbourhood Plan 2022-2038: Regulation 16 Draft [‘the draft NP document’].</p> <p>1.2 Turley submitted representations to the Portishead Neighbourhood Plan 2022-2038: Regulation 14 Draft on behalf of Bloor Homes South West and Aston & Co UK. While not repeated in full here, the previous round of representations can be found at Appendix 1, and we cross reference to these previous representations where relevant.</p> <p>1.3 For the avoidance of doubt, we also confirm interest in appearing at the NP Examination Hearings when they commence.</p> <p>Background</p> <p>1.4 The representors have a significant interest in land at Black Rock, Portishead. A site-specific location plan is provided at Appendix 2 of this representation, which confirms the extent of the Representors’ land interest at Black Rock.</p> <p>1.5 We have responded on behalf of the Representors to the North Somerset Local Plan ‘Pre-Commencement Document’ which was open for consultation in April 2020, the ‘Challenges for the Future’ document in July 2020 and the ‘Choices for the Future’ document in November 2020. We also responded to the North Somerset Local Plan 2038 Preferred Options: Consultation Draft March 2022.</p> <p>1.6 A significant proportion of land at Black Rock is within the control of Bloor Homes and the overall site has been promoted through the forward plan system by Aston & Co since 2016. Bloor Homes are an experienced national house builder with a proven track record of high-quality design, with the delivery of homes across a range of site scales. Information on the Site context is provided at Appendix 3.</p> <p>1.7 Black Rock provides many site-specific location benefits which can aid and promote sustainability, including the opportunity to assist in the delivery of the Gordano Greenway between Clevedon and Portishead. Initial technical work (including work submitted in support of these representations) shows that the site can come forward with no unacceptable environmental impacts, including any unacceptable impacts to landscape or ecology (including impacts to the nearby Weston Big Wood SSSI).</p>	<p>Appendix 9 - Portishead NP - Land at Black Rock - Culture and Heritage Report.pdf</p> <p>Appendix 2 - Portishead NP - Land at Black Rock - Location Plan.pdf</p> <p>Appendix 8 - Land at Black Rock - Strategic Landscape and Visual Appraisal - Part3.pdf</p> <p>Appendix 4 - Portishead NP - Land at Black Rock - Landmark Landscape and Ecology Note (November 2022).pdf</p> <p>Appendix 1 Representations to Reg 14 Bloor Homes.pdf</p> <p>Bloor Homes representation.pdf</p>

Respondent Name	Organisation	Comment	Attachments
		<p>1.8 We have reviewed the draft NP document in full and have overarching concerns with the draft plan's conformity with North Somerset Council's Development Plan (either adopted or emerging). In addition, we respond to draft policies PEN1, PEN4, PEN5, PEN6, PEB1, PEB2, PWH3, PWH10, and PPT1.</p> <p>(Please see attached documents for full submission-appendix 3 is included within the main representation document)</p>	<p>Appendix 5 - Portishead NP - Land at Black Rock - Vision Document Booklet.pdf Appendix 7 - Portishead NP - Land at Black Rock - BNG Note.pdf</p>

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