CLAVERHAM NEIGHBOURHOOD PLAN
STATEMENT OF CONSULTATION

2016 - 2026

YPC APPROVED FOR SUBMISSION

8th May 2017
Foreword

This is the Claverham Future Statement of Consultation. It presents a full account of all the meetings, surveys, questionnaires and press publicity undertaken by the group to ensure that everyone in the Neighbourhood Plan could, if they chose, have their say in the development of the Neighbourhood Development Plan.
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1 Engaging With the Community

1.1 General
Claverham Future’s Steering Group (SG) identified consultation as the key to successfully developing a NDP for the village. This would include newsletters, village-wide surveys, public meetings, presentations and articles in the local press. There would also be opportunities for participation online. To ensure no group was left out of the process a simple desk-based survey of local community groups and activities in Claverham was undertaken. The wide range of groups and activities indicated a thriving and active local community and this strong sense of community also showed in the responses made to consultations at all stages in the preparation of the NDP.

The Steering Group identified three different stages of consultation:

- Raising awareness and asking for comments on the issues and options to be considered
- Consultation on a draft plan
- Promotion of the final plan and raising awareness of the local referendum

1.2 Yatton Parish Council and Yatton Neighbourhood Plan Group

The steering group developed the neighbourhood plan on behalf of Yatton Parish Council (YPC), who have approved the different versions of the plan for consultation and examination at all relevant stages.

Yatton Parish Council is in the unusual position of overseeing the preparation of two neighbourhood plans, the other being for the Yatton neighbourhood plan area. Members of both areas’ neighbourhood plan groups were involved in proposing the plan areas. However, the different timescales involved and the different nature of the villages (Claverham is an Infill village and Yatton a service village) has meant there were limited requirements for consultation between the two. Yatton Parish Council provided the link between the two plans (apart from where there was specific need for consultation), by appointing a Parish Councillor who sat on both Neighbourhood Planning groups.

A member of the Claverham NDP Steering Group had several meetings during summer 2016 with members of the Yatton and Congresbury NDP Steering Groups to consider the effect of traffic flows on the 3 villages. A trial traffic survey was conducted along Claverham Road on 2nd August which showed only 4 HGVs during a 3.5 hour period. As such it was concluded that HGVs are not an issue for Claverham and as such Claverham did not take part in a full-day survey conducted by Yatton and Congresbury NDP Steering Groups.
2 Consultation Timetable

<table>
<thead>
<tr>
<th>Type of Consultation</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Meeting with councillors and residents to decide on whether to have two separate NPs – one for Claverham and one for Yatton</td>
<td>January 2015</td>
</tr>
<tr>
<td>Yatton Parish Council requests North Somerset Council agreement for two separate NPs</td>
<td>February 2015</td>
</tr>
<tr>
<td>Travel Survey</td>
<td>Jan to Feb 2015</td>
</tr>
<tr>
<td>Newsletter</td>
<td>February 2015</td>
</tr>
<tr>
<td>Youth Survey undertaken by Youth Group</td>
<td>February 2015</td>
</tr>
<tr>
<td>Posters put up in village asking for community involvement</td>
<td></td>
</tr>
<tr>
<td>Letter to residents in Claverham Road</td>
<td>April 19th 2015</td>
</tr>
<tr>
<td>Leaflet delivered to residents asking for community involvement</td>
<td>April 21st 2015</td>
</tr>
<tr>
<td>May Day Presentation in form of manned display</td>
<td>May 4th 2015</td>
</tr>
<tr>
<td>North Somerset Council officially agrees two separate NPs</td>
<td>May 2015</td>
</tr>
<tr>
<td>Newsletter</td>
<td>June 2015</td>
</tr>
<tr>
<td>Public Meeting</td>
<td>July 16th 2015</td>
</tr>
<tr>
<td>Presentations during summer in the form of a manned display of photos and information at the monthly village market</td>
<td>Jul, Aug &amp; Sep 2015</td>
</tr>
<tr>
<td>Planning History</td>
<td>July 2015</td>
</tr>
<tr>
<td>Landowners Survey</td>
<td>July and August 2015</td>
</tr>
<tr>
<td>Business Survey</td>
<td>July and August 2015</td>
</tr>
<tr>
<td>Claverham UTC mtg</td>
<td>July 2nd 2015</td>
</tr>
<tr>
<td>Main Public Survey via questionnaire delivered to every house</td>
<td>January 4th 2016</td>
</tr>
<tr>
<td>First invite to public meeting</td>
<td>February 27th 2016</td>
</tr>
<tr>
<td>Public Meeting</td>
<td>March 18th 2016</td>
</tr>
<tr>
<td>Email thanking residents for attending public meeting</td>
<td>March 19th 2016</td>
</tr>
<tr>
<td>Survey of children at Court de Wycke Primary School</td>
<td>March 2016</td>
</tr>
<tr>
<td>Site allocation Plan public meeting</td>
<td>March 31st 2016</td>
</tr>
<tr>
<td>Parish Poll organised by Yatton Parish Council</td>
<td>April 1st 2016</td>
</tr>
<tr>
<td>First mass email regarding six week consultation on draft plan</td>
<td>June 2016</td>
</tr>
<tr>
<td>Second reminder email</td>
<td>June 2016</td>
</tr>
<tr>
<td>News paper articles</td>
<td>June 2016</td>
</tr>
<tr>
<td>Poster campaign in Claverham and Yatton Library</td>
<td>June 2016</td>
</tr>
<tr>
<td>Letters or email to statutory consultees</td>
<td>June 15th 2016</td>
</tr>
<tr>
<td>Reminder letters and emails</td>
<td>July 19th 2016</td>
</tr>
</tbody>
</table>
3 Raising Awareness

The first stage was carried out between February 2015 and January 2016

3.1 Travel Survey

This was completed in February 2015. Every household in the village received a questionnaire. There was also the option to complete the survey online. In total, 252 individual responses (21% of the 2011 census recorded residents of age 16 or over) were returned either as paper copies or on-line. Paper copy responses were manually added to the on-line (survey monkey) dataset to enable combined data analysis.

Summary of responses

Travel by private motor vehicle is much higher in Claverham than the rest of England & Wales and the reasons for this identified by the survey are twofold.

• Firstly, the majority of Claverham residents live more than 2km from the shopping precinct in Yatton, with the connecting road between the two villages being very narrow, lacking continuous footways and being widely perceived as being both unpleasant and dangerous for walking or cycling. Comments on the survey suggest that this is a particular barrier to the disabled and those with children.

• Secondly, Claverham is poorly served by public transport in terms of both frequency and range of bus services and residents felt that more frequent buses travelling to a wider range of destinations would be the factors most likely to enable them to make better use of public transport. Improvements to travel service information and rail services were not perceived to be important factors in this regard, the latter most likely because the nearest railway station is too far to walk and is only connected to Claverham by infrequent buses.

See Document D for the questionnaire and the full analysis of responses

3.2 Newsletter

A newsletter was delivered to every household in the village explaining the process of making a NDP

See Document C.
3.3 May Day presentation 2015

The first presentation to the public was at the village’s annual May Day celebrations on May 4th.

A stand showing photos taken from various points around the village was manned by members of the Steering Group who explained what a NDP was. Thirty-five of the visitors filled in a simple questionnaire on how they saw the future of the village. Many more gave their verbal support.

Summary of received responses:
It was clear that Claverham’s NDP should concentrate on three areas:

1. Housing development
2. Transport and traffic
3. The local environment and green spaces

See Document E for questionnaire and analysis of responses

3.4 Public meeting July 16th 2015

This was held in the village hall and was attended by more than 50 people. After a short presentation there was an opportunity for everyone to give their opinions on several issues, the main areas of discussion - Housing, Transport and Environment, were represented at different tables and the participants’ views were recorded and then taken forward as the basis for the Main Survey.

See Document F for the presentation and summary responses.
3.5 Presentations during summer

An attended stand with photographs and information was set up in the monthly village market during June, July and August. This provided an opportunity for those unable to attend the public meeting to give their views.

See Document G for table of responses

3.6 Planning History

A review of housing developments between 2000 and 2015 within the village settlement boundary, using information supplied by North Somerset Council, showed that on average 3.4 new properties were built per year and that one site had 10 houses, but that that was a single event.

Some key conclusions:

1. Claverham Road has been subject to the largest proportion of applications for new dwellings, particularly those relating to sites from 2 to 9 units or < 0.5ha. This is perhaps unsurprising when considering the nature of the road, the number of properties it holds, and Claverham’s status as an Infill Village within the planning policy.

2. There are no obvious patterns in development in the Plan area either by location or date, other than that of extension applications obviously falling where most of the properties are.

3. The planning history seen within the Plan area in the period (of basically small-scale infill), suggests that it is not necessary to allocate any specific sites for new housing in the Neighbourhood Plan and that the village should continue to develop organically through infill plots and conversions. However, care will be needed to ensure that such development is appropriately located and designed.

4. The continued evolution of agriculture and the likely further growth in horse related activity mean that the level of applications for farm buildings and equine uses is likely to continue. This may in turn lead to opportunities for the re-use of buildings and structures that become redundant.

See Document K for detail and analysis
3.7 Landowners survey

Because the NDP will not be making allocations for larger scale development, a “Call for Sites” was not considered to be either appropriate or necessary.

However it was agreed that local landowners should have the opportunity to have their views taken into account. Fifty six owners of land adjacent to the settlement boundary and on the moors were interviewed either face to face or by email between July and August 2015. A further email to the major land holders in the village was sent on July 25th 2016 as part of the Pre-Submission Consultation

The survey showed that the majority wished the land to remain in agriculture to give them and their descendants a sustainable way of life within a low carbon economy. In return they accepted they were the custodians of countryside and responsible for maintaining walls, hedges and ancient boundary features as well as preserving wildlife habitats.

The full breakdown of views is set out in the table below:

<table>
<thead>
<tr>
<th>Land use</th>
<th>Number of land owner in favour</th>
</tr>
</thead>
<tbody>
<tr>
<td>Land to remain in agriculture</td>
<td>37</td>
</tr>
<tr>
<td>Land offered for development</td>
<td>6</td>
</tr>
<tr>
<td>Land to be offered for first time buyers</td>
<td>1</td>
</tr>
<tr>
<td>Land to remain for equine use</td>
<td>12</td>
</tr>
</tbody>
</table>

3.8 Business survey

An assessment of the type and number of companies in the area covered by the NDP was carried out during July and August 2016 using local knowledge, telephone directories and local websites. The thirty plus businesses fell into four categories:

1. Shops in the High Street
2. Those based in small scale industrial units in Lower Claverham, Moor Road and Jasmine Lane
3. Home-based enterprises
4. Riding school and livery yards

Most of the businesses employ only one or two people. Each business was given a short questionnaire, either by hand, fax or email.

Only three responded. However only a few rely on local support, the others are based in Claverham for convenience, but draw their customers from a wide area.
### Responses

<table>
<thead>
<tr>
<th>Type of business</th>
<th>Address</th>
<th>No. of employees</th>
<th>How many live in Claverham</th>
<th>Do you see your business remaining in Claverham?</th>
<th>Do you want to expand in village?</th>
<th>Do you want more industrial units?</th>
<th>Extra facilities</th>
<th>More housing</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Green Oak</td>
<td>Lower Claverham</td>
<td>15</td>
<td>none</td>
<td>yes</td>
<td>no</td>
<td>no</td>
<td>Post Office</td>
<td>Not necessarily</td>
</tr>
<tr>
<td>Timber Frame</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Bank</td>
<td></td>
</tr>
<tr>
<td>Construction</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Café</td>
<td></td>
</tr>
<tr>
<td>2 Riding</td>
<td>Brockley Way</td>
<td>6</td>
<td>1</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>Yes, more houses for young families. Housing Ass. Housing</td>
<td></td>
</tr>
<tr>
<td>school</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 Cafe</td>
<td>High Street</td>
<td>5</td>
<td>1</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>More customers</td>
<td>Yes, would lead to more customers</td>
</tr>
</tbody>
</table>

*See Document H for questionnaire of general businesses*

### 3.9 Claverham UTC

As the largest scale Business in the plan area, although most employees commute to the site, separate consultation was undertaken.

*Claverham UTC Consultation is also provided in Document H*

The likelihood and stated intention of Claverham UTC at time of writing is to vacate their Claverham site in the short to medium future. The land occupied by Claverham UTC’s factory is an employment Zone and it may well be sold and continue to be used in the same planning use, in that case the whole site would continue to be outside of the settlement boundary and have equal constraints.

Should the factory part of site not continue as an employment zone then this Plan provides for a supported change of use within specific boundaries.

### 3.10 Youth Facilities

A particular Youth Hub survey was undertaken by an independent group in Claverham and is included at Document K. The Conclusion of the survey is that a Youth Hub is a desirable objective for Claverham and is one that can be supported in this plan.

It is noted that currently there is no suitable location identified for such a facility nor funds to create one.

Nevertheless this NDP supports the principle of a Youth Hub should the opportunity arise to create an inclusive facility in a safe fully supervised location.

*More information is provided at Document I* (Youth Hub organisers are independent of Claverham Future and should be separately contacted for full detail)
4 Consultation On Draft Plan

4.1 Main Survey in January 2016

On the 4th January questionnaires were delivered to every house in the village. There was also the option to complete the survey online. The questions were based on information obtained from previous consultations but mainly from the public meeting held on July 16th 2015.

The responses from this survey were presented to a public meeting in the village hall on 18th March 2016 together with the draft NDP.

See Document J for Survey and Full Results

Summary of Findings (Quoting Question References from Survey):

The following summary of the NDP survey results is based on the majority views expressed by the 292 respondents. It is notable that statistically, based on the 2011 Census population data of 1,323 residents over 10 years of age, it is 95% certain that the answers given are representative of the residents’ views with a confidence interval of 5.06%.

Environment

In terms of landscape features, villagers who responded felt the following were of high value to them: Quiet lanes, Public Footpaths, Open Farmland, The Moors and Rhynes, Ancient Hedgerows and Stone Walls. The quiet lanes and footpaths across open countryside were of particular importance due to their recreational value. (Q4, Q6).

In the built environment, villagers who responded placed the highest value on Listed Buildings, but also gave high value to The Village Hall, Court-de-Wyck School, Historic Farm Buildings and Special Features such as the old (cast iron) road signs (Q5, Q6).

In terms of open spaces, the Fields to the North of Chestnut Drive, Safe Streets for Children’s play, use of the field adjacent to the Village Hall and access to Cadbury Hill (outside of the plan area) were all of high importance. Court-de-Wyck School field has been appreciated by villagers who responded, but is no longer accessible. Broadcroft open space was not of high importance to the majority of villagers who responded (Q7).

Villagers who responded felt that The Fields and Public Rights of Way, Lanes and Hedgerows, Moors and Rhynes, Back Gardens and Ponds and Streams were all highly important for wildlife in the village (Q8).

Flooding was clearly the major environmental concern of villagers who responded. Some suggested that better management of drainage ditches would help. The majority placed high importance on the creation of more formally allocated open spaces, in addition to the current provision in Broadcroft Open Space. (Q9).
Housing

The majority of villagers who responded did not support building any houses outside of the current settlement boundary. There was limited support for building up to 15 houses outside of the current settlement boundary. In general terms, the majority of villagers who responded would prefer any new development to be restricted to housing-only, rather than commercial or mixed development. For the UTC commercial site, however, a clear majority would prefer re-development to be mixed use. (Q10, Q11, Q12, Q21)

Responses said any new houses should be a mixture of sizes and should be restricted to two storeys. Developments should also contain a mixture of market housing and affordable homes where appropriate. Division but not demolition of existing houses should be allowed in order to create additional housing. New properties should be in keeping with existing village character, provide adequate off-street parking to reflect local levels of car ownership and be energy efficient/carbon neutral. (Q13, Q14, Q15, Q16, Q17, Q18, Q19, Q20).

Traffic and transport

The majority of villagers who responded would like to see traffic calming measures introduced along the Claverham Road. Speed bumps were the least popular means to achieve this. (Q22).

There was strong support for improving pedestrian access to Yatton, including improvements to the public footpath leading from Hunts Lane and/or widening the pavements in places along the Claverham Road, even where this would narrow the road to a single lane (Q23, Q24, Q28).

Residents and businesses who responded would generally like to see unrestricted car parking continue in the village, but were in favour of limiting parking to one side of High Street [presumably for safety reasons?] (Q25, Q26).

A clear majority of villagers who responded would like to see improvements to the bus services and there was also support for placing a bicycle stand on the green verge in Chestnut Drive. (Q27, Q29)

Facilities

The majority of villagers who responded would support the creation of a shop and medical facility in the village, but many also expressed concerns that a shop may not be viable. (Q30)

Businesses

The main concern for business owners in the village who responded was access to high speed internet (fibre to premises). (Q31)
5 Promotion of Draft Plan

5.1 PUBLIC MEETING ON DRAFT PLAN

A public meeting was held on 18th March to present and discuss:

- Vision statement
- Objectives
- Policies

all of which were informed by the consultation conducted to date.

The hundred plus villagers, who attended were divided into tables where members of the steering group led discussions. This allowed everyone to have their say on the draft proposals for the Vision Statement, Objectives and Policies followed by a vote on each one.

After discussion the meeting decided against 1) surfacing the footpath running from Hunts Lane to Yatton and 2) restricting parked cars to one side of the High Street only.

The results are given in Document N and were used to make the necessary but minor revisions to revision #8 of the Plan. However, the vast majority of matters received overwhelming support, upholding the confidence interval suggested from the Main Survey.
6 Pre-Submission Statutory Consultation

A letter as given on the next pages was sent on to the statutory consultees, including those prescribed by regulation and other locally interested organisations (including other Parish Councils). A six-week period, running to 1st August 2016, was allowed for responses. Reminder letters, asking for confirmation of interest and inclusion in future consultations was subsequently sent to non-respondents.

Advertising was provided via Mailchimp emails, the local newspaper and posters in prominent local locations

Replies that were received are recorded in the following section.
6.1 First Teaser Email

Notice of upcoming Consultation.

**Claverham Future**

**Neighbourhood Plan Consultation!**

MONDAY 20th JUNE TO MONDAY 1st AUGUST

See the latest plan (from 20th!)

- Yatton Library
- Claverham Village Hall
- The Claverham Future Website [http://www.claverhamfuture.org.uk](http://www.claverhamfuture.org.uk)

Send any comments (from 20th!)

- The Clerk at Yatton Parish Council
- Claverham Future email [info@claverhamfuture.org.uk](mailto:info@claverhamfuture.org.uk)

We have a complete draft document, which many of you will be familiar with and you have already provided your comments. The official process requires us to advertise the plan and submit it to a whole host of people and organisations. This process lasts six weeks and you are also invited to make any comments you may wish to. (You don't have to comment but we are required to notify you that you can and we will consider anything valid we receive from you).

We will contact you again to say the Consultation has started on 20th June

THANK YOU AGAIN! - CLAVERHAM FUTURE STEERING GROUP
6.2 Second Reminder of commencement Email

Consultation is now started as of 20th June, last comments by 1st August!

Claverham Future

Neighbourhood Plan Consultation

NOW STARTED! - MONDAY 20th JUNE
Last Comments by MONDAY 1st AUGUST

See the latest plan

- Yatton Library
- Claverham Village Hall
- The Claverham Future Website

Send any comments

- By Post to: The Clerk at Yatton Parish Council, 48 High Street, Yatton BS49 4HJ
- Claverham Future email info@claverhamfuture.org.uk

Remember, this process lasts six weeks and you are also invited to make any comments you may wish to. (You don't have to comment but we are required to notify you that you can and we will consider anything valid we receive from you).

THANK YOU AGAIN! - CLAVERHAM FUTURE STEERING GROUP

unsubscribe from this list we hope you don't (We will only use your address for Claverham Future)
6.3 Yatton & Congresbury Newspaper Article

Claverham’s Neighbourhood Plan

Claverham’s draft Neighbourhood Plan is now going through a statutory six-week public consultation as part of the process of getting it accepted by North Somerset Council. It has been drawn up following extensive public involvement and is available to see on the steering group’s website: www.claverhamfuture.org.uk. To download a copy, click The Plan on the top menu. Copies can also be obtained from the Yatton Parish Council office - call 01934 426473, or viewed in Yatton Library or Claverham Village Hall during opening hours. Any comments need to be received by 1st August - either online or to Yatton Parish Council office. After that the plan will go to a ‘Pre-examination Review’ where it will be looked at by an impartial examiner to ensure that it complies with all the Government requirements.
Surveys to solve village traffic woe

Studies are being carried out to reduce traffic in villages.

Congresbury’s neighbourhood plan team is linking up with the Yatton and Claverham groups to fund a traffic consultant.

It has also approached Churchill Parish Council to run a study to evaluate the effect the South Bristol Link Road will have on Stock Lane and Bremes Road once it opens later this year.

Village flower festival continues to grow into a great event

An event which began as a tiny seed two years ago has been held in Kingston Seymour.

A celebration in flowers of music and verse was organised and made the festival possible.

“Villagers would have come from our tiny seed without enthusiasm and hard work. I never cease to be amazed at the creativity, dedication and friendship this group offers.”

For more photographs from the event, log on to www.northsomersettimes.co.uk

Campaigners fighting to protect green boundary with Cleeve

Villagers in Claverham have the chance to comment on a neighbourhood plan which shows the way for development in the area.

The Claverham Future steering group has been creating a neighbourhood plan for the village for the past 18 months. Although the plan is still a long way off being fully adopted, Yatton Parish Council has voted to support it.

It began working when Gladman Homes’ plan to build up to 70 homes off Chestnut Drive came to light.

According to the plan, the village will support sustainable development within designated areas such as the UTC site in Bishops Road and Claverham’s ‘rural character’ will be protected by maintaining a clear green separation from Cleeve.

Grace Earl
pace@archant.co.uk

For more details about the club, visit www.portisheadlions.org.uk

To see more photographs from the event, log on to www.northsomersettimes.co.uk

To read the plan, log on to www.claverhamfuture.org.uk

Banners protesting against Gladman’s plan have been up for months.
6.5 Poster put up around Claverham and in Yatton Library

CLAYERHAM
Neighbourhood Plan
CONSULTATION

COMMENT ON THE LATEST PLAN
FROM
Monday 20th JUNE 2016
LAST COMMENTS MUST BE RECEIVED NO LATER THAN
Monday 1st AUGUST 2016

SEE THE PLAN
• Yatton Library
• Claverham Village Hall
• www.claverhamfuture.org.uk

ADDRESS YOUR COMMENTS
• The Clerk, Yatton Parish Council, 48 High St, BS49 4HJ
• info@claverhamfuture.org.uk
6.6 Letter Sent By Email and Post with Draft Plan

Dear Consultee,

Pre-Submission Consultation: Claverham Neighbourhood Plan
(In Accord With Regulation 14 of The Neighbourhood Planning (General) Regulations 2012)

Introduction
As part of our government’s Localism initiative the residents of Claverham are taking the opportunity to create a Neighbourhood Plan to provide guidance on the wishes of our village in relation to development planning up to the year 2026. Claverham Future (please see website at www.claverhamfuture.org.uk) is working to produce the Neighbourhood Plan with the support and authority of Yatton Parish Council. You or your organisation have been contacted directly as you may have an interest in the Plan proposals.

Invitation to Comment
You are invited to raise any matters that you, or your organisation, wish to be considered in relation to Claverham’s Neighbourhood Plan.

Any comments received in due time will be reviewed by the Claverham Future steering group and Yatton Parish Council. Review and possible revision to the Plan will be in the light of the whole consultation process, with regard to regulatory requirements and the interests of the local community.

The Plan is striving to develop guidelines for auditably-sustainable and appropriate future development that meets local need and is sensitive to preserving and improving key aspects of our local environment whether it be flora, fauna, history or character.

Time to Comment
Your response must be received no later than Monday 1st August 2016
The required six-week period commences on Monday 20th June 2016 (20/6/16)

Address for Comments
By Post: Claverham Future, c/o The Clerk, Yatton Parish Council, 48 High Street Yatton BS49 4HJ
By email: info@claverhamfuture.org.uk

SEE NEXT PAGE TO FIND HOW TO OBTAIN COPIES OF THE PLAN
FIND YOUR COPY TO REVIEW

Download Copies of Claverham's Neighbourhood Plan
You will find the latest draft copy of the Neighbourhood Plan on our website:
www.claverhamfuture.org.uk just click the top menu 'The Plan' and you will see the latest draft and be able to download your own copy.

See a Public Copy of Claverham's Neighbourhood Plan
Public viewing is available at Yatton Public Library and Claverham Village Hall during their normal opening hours.

Request Paper Copy of Claverham's Neighbourhood Plan
Write to Yatton Parish Council at 48 High Street Yatton BS49 4HJ allowing reasonable time for post and printing for receipt of copy and issuing any comment arising.

Request Electronic Copy of Claverham's Neighbourhood Plan
Email info@claverhamfuture.org.uk identifying "Request for Copy of Claverham Neighbourhood Plan" in the subject line to be dispatched a copy as an attachment. Allow reasonable time dispatch and issuing any comment arising.

ANY QUESTIONS?

We will endeavour to answer any relevant queries, please email: info@claverhamfuture.org.uk or contact Yatton Parish Council tel: 01934 426473

Claverham Future thanks you for your assistance in this matter.

Yours Faithfully

NIGEL H COOPER
CHAIRMAN CLAVERHAM FUTURE

www.claverhamfuture.org.uk
info@claverhamfuture.org.uk
This letter has been sent to:

1. Historic England (email)
   29 Queen Square
   Bristol
   BS1 4ND
   0117 9751308
   southwest@HistoricEngland.org.uk

2. YACWAG (email)
   Secretary: Win Lowman
   winlowman@hotmail.co.uk
   01934 833596

3. Cleeve Parish Council (email)
   Clerk, Gemma Richards.
   cleeveparishcouncil@hotmail.co.uk

4. Congresbury Parish Council (email)
   Orchard House,
   The Old School Rooms,
   Station Road, Congresbury, BS49 5DX
   01934-838802
   Clerk@Congresbury-pc.gov.uk

5. Natural England (email)
   Amanda Grundy
   County Hall, Spetchley Road
   Worcester, WR5 2NP
   01900 608 311
   consultations@naturalengland.org.uk

   Young Farmers (email)
   Somerset Federation YFC
   The Old School, School Road
   Westonzyland
   Bridgwater
   Somerset TA7 0LN
   01278 691711
   www.somersetyfc.org.uk
   admin@somersetyfc.org.uk

6. West of England Rural Network (email)
   The Mill, Tumbridge Road
   Chew Magna
   Bristol
   BS40 8SP
   01275 333701
   Email: info@wern.org.uk

7. North Somerset Council (email)
   michaelreep@n-somerset.gov.uk

8. Environment Agency (email)
   Mr B Smith
   Rivers House, East Quay, Bridgwater, Somerset
   TA6 4YS
   nwx-sp@environment-agency.gov.uk

9. BT OPENREACH (email)
   networkalts.southwest@openreach.co.uk
   The Courtyard, 24 London Road, Newbury, RG14 1JX

10. Western Power Distribution (email)
    mhillman@westernpower.co.uk

11. National Grid GAS (email)
    Nationalgrid.Enquiries@nationalgrid.com

12. Bristol Water (email)
    customer.services@bristolwater.co.uk
    Bristol Water plc
    Bridgwater Road
    Bristol
    BS13 7AT

13. Wessex Water (email)
    Planning liaison@wessexwater.co.uk

    32 Jacobs Wells Road
    Bristol
    BS8 1DR
    0117 917 7270
    mail@avonwildlifetrust.org.uk

15. LG51 Owner: Claverham UTC (email)

16. The Society of Friends (email)
    Meeting House
    Meeting House Lane,
    Claverham, Bristol, BS49 4PB
    c/o Tom Leimdorfer
    leimdorfer@care4free.net
17. St Barnabas, Claverham {email}
Rev David Brian Harrex - Team Vicar

18. North Somerset Levels Internal Drainage Board {email}
The Cider House
The Grange Business Park
Hewish
Weston-super-Mare
BS24 6RR
01934 833388
theclerk@nslidb.org.uk

19. Brockley Parish Council {email}
Ms Joanna van Tonder
Tel: brockleypc@hotmail.co.uk

20. Nailsea Town Council {email}
Nailsea Tithe Barn, Church Lane, Nailsea
North Somerset BS48 4NG
clerk@nailseatowncouncil.gov.uk

21. Network Rail {email}
Network Rail
1 Eversholt Street
London
NW1 2DN
property@networkrail.co.uk

22. Claverham Court {email}

23. Grove Farm {email}

24. Brook Farm {email}

25. Bridge Field Farm {email}

26. Streamcross Farm {email}

27. Parcels of Land {email}

28. Woodspring Wings {email}
Bob Brooks - Secretary
Woodspring Wings
Claverham Drove
Claverham

29. Chestnut Farm {email}

30. Bishops Road Land Parcel {email}
Alison Lee
31. The Homes and Communities Agency
Colin Molton
Executive Director, South and South West
2 Rivergate, Temple Quay
Bristol
BS1 6EH

32. LGS2 Owner: Mr Nicholas James Hubert Burnett

33. LGS2 Adjacent Owner: Mrs C Bushell

34. Kenn Parish Council
Eleanor Wade

35. Claverham Free Church

36. LGS2 Owner: Mr Peter Frederic Burnett

37. Catholic Chapel Claverham:
c/o Rev Reg Grey (Parish Priest)
The Immaculate Conception Church,
The Franciscan Friary,
Clevedon,
North Somerset,
BS21 7PP

38. North Somerset CCG
Mrs K Headdon
NHS North Somerset, Castlewood, Tickenham Road,
Clevedon
BS21 6FW

39. Philip C Knowles
6.7 Reminder Letter Sent By Email and Post (with copy of original letter.

Dear Consultee,

REMANDER:
Consultation Closing Monday 1st August 2016

Pre-Submission Consultation: Claverham Neighbourhood Plan
(In Accord With Regulation 14 of The Neighbourhood Planning (General) Regulations 2012)

You will have previously received the letter overleaf which gives full details of the process and will also have a copy of the current draft Plan.

Should you wish to raise comment upon the draft Claverham Neighbourhood Plan then you are advised that comments must be received prior to 1st August 2016.
7 Pre-Submission Statutory Consultation Responses

7.1 North Somerset Council Officers’ Updates on Basic Conditions

Herewith a verbatim text

Claverham Future Basic conditions statement

1. Comments on Conformity with Strategic policies of development plan

The Basic Condition Statement lists in a very clear manner the relevant policies in the Core Strategy and Sites and Policies Plan part 1 Development Management Policies which the Claverham Future policies have some relevance to. It does however omit to state that the Neighbourhood Plan policies are in conformity with those strategic policies of relevance.

2. Updates on Planning Policy references

Para 5.1

The development plan for North Somerset comprises:-

- Core Strategy
- Neighbourhood Plans (Backwell and Long Ashton)
- Proposals Map
- Sites and Policies Plan - Part 1 Development Management Policies (resolution to adopt at Council 19 July 2016)
- North Somerset Replacement Local Plan 2007 only those saved Policies not superseded by Core Strategy or Development Management policies as below:
  - ECH/1: Amenity Areas and gateways to settlements
  - E/3: Mixed use development (inc employment)
  - E/8: Proposals for change of use of hotel and tourist accommodation.
  - H/7: Residential development within settlement boundaries
  - E/5: Safeguarded employment sites
- Waste local Plan (only policy WLP10 relating to a site in Weston-super-Mare)
- Supplementary planning advice
Draft plans

- West of England Joint Spatial Plan (issues and options winter 2015/16)
- Sites and Policies Plan- Part 2 Site allocations (Consultation draft stage Spring 2016)

**Update on para 5.3**

The hearings into the remaining remitted policies (CS6, CS14, CS19, CS28, CS30-33) took place 21-23 June 2016. The hearings considered the Council’s proposed changes to these policies to address the consequences of the increased housing requirement of 20,985 dwellings adopted in September 2015. The Council will shortly publish proposed modifications to address the inspectors’ comments which will suggest changes to policy CS33 to reflect that greater flexibility may be needed within the settlement boundaries of infill villages. These proposed modifications will be subject to consultation and responses will be forwarded to the inspector prior to the inspector producing his final report (expected September 2016).

This para may needed to be updated again to reflect any additional changes prior to submission.

**Update on para 5.4**

The Core Strategy is underpinned by more detailed policy documents, namely Sites and Policies Plan Part 1 Development Management Policies, the remaining policies of the Adopted North Somerset Replacement Local Plan 2007 (see list above) and the Backwell and Long Ashton Neighbourhood Plans. The emerging Sites and Policies Plan Part 2 Site Allocations is only at consultation draft stage and therefore has limited weight in decision making.

**Update on para 5.5**

This para can now be deleted.
7.2 North Somerset Council Officers’ Comments on Claverham Neighbourhood Plan

Herewith Verbatim text

Date: 26 July 2016
My ref:
Your ref:
Contact: Celia Dring
Direct dial: 01934 426244
Email: celia.dring@n-somerset.gov.uk

North Somerset Council comments
Claverham Neighbourhood Plan Consultation Draft

Introduction

All those involved in Claverham Future are to be congratulated on developing the draft Claverham Plan, which demonstrates (sic) the vast amount of work, evidence gathering and community involvement which has gone into the draft Plan. The comments of North Somerset Council officers as set out below are given in the acknowledgement of this and with intention simply to ensure that the plan is effective and the policies deliverable when used to assess future planning proposals.

General comments
**Wording** - Any revisions to the Plan following this consultation should reflect that the plan will be submitted in its final form (subject to any modifications from the examiner) and the wording should reflect this. Slight changes may be needed in Foreword fourth para to reflect this (also Examination instead of Inspection).

**Reference to Appendices throughout** – it will not be practical to include the background evidence contained within the appendices as part of the final plan, given the extensiveness of the information. It has an important role in justifying the policies up to examination stage, but the final plan can be reworded to remove direct reference to the appendices and simply refer to evidence collected during the development of the plan.

**Justification** - The plan policies would benefit from some justification to explain why the policy is necessary. This could be on the basis of individual policies or on groups of policies as appropriate and does not need to be lengthy. As the appendices would not be part of the final plan there would be no supporting evidence contained within the plan itself otherwise. There are lots of examples of how this has been done elsewhere in other Neighbourhood plans.

**Core Strategy Policy CS33** - this policy was one of a number which have been the subject of re-examination and the content may still be subject to change. NSC will update yourselves once we have clarity on the policy wording.

**Inset maps** - the two inset maps appear to duplicate each other, was one intended to be a more detailed map of the employment zone and associated protected areas? It would be useful to have an additional map to show the whole of the settlement boundary area and location of proposals and potentially highlighting any specific road/areas referred to in the transport policies or other policies.

North Somerset Council can help with any additional mapping requirements.

**Other**

Any references to North Somerset Council should be made in full rather than “NSC”

**Specific Comments**

**Section 5 engaging with the community p13**

The Statement of Community Involvement which will be produced for submission stage will detail the consultation undertaken. This could be more therefore be referred to here
instead of the Appendices which will presumably not form part of the plan once the plan is made.

6.2 Objectives

Objective 1 could be shortened by simply making reference to section 17 and 95 of the NPPF and rephrased to more clearly reflect that it is an objective. A suggestion could be “To support the sustainability objectives of the NPPF in relation to large scale developments (para 17) and low carbon future (para 95) by recognising that as a designated infill village by policy CS33 of the North Somerset Core Strategy, Claverham is not a sustainable location for development. The objective is therefore to support appropriate alternative sustainable development within the defined employment zone and infill development within the settlement boundary.”

8 Development Policies

D1 New Development The policy wording could be considered a little strong overall and it is difficult to claim “no net difference” in reality, more likely to be potentially similar.

D2 Design of new developments, conversion and extensions. Should delete the word “guaranteed” form criteria 6, as the planting scheme cannot be guaranteed, but conditions relating to maintenance etc can deal with this.

D3 Creation of a mixed use site or continued employment use
The policy takes a sensible approach to the possible closure of the UTC employment site the location of which at Claverham reflects historical factors rather than current locational priorities. If there is little interest in a “like-for-like” alternative employment use given the sites location and historical demand, then redevelopment for mixed uses would be a practical solution.

6-noise levels. The intention of this appears to be to ensure that background noise levels are not increased through further development of the employment zone. This objective is supported in principle and whilst it is acknowledged that amendments have been made to the original policy to reflect previous comments there are concerns that in it’s current form it may still not be enforceable. Setting the rating level 5dB below background noise levels, whilst theoretically makes sense, in reality trying to measure and enforce this on site would be incredibly difficult.

Additionally BS4142:2014 gives the assessment period for the daytime between the hours of 07:00 to 23:00 and night time as 23:00 to 07:00. The policy contradicts itself in that it recommends that noise levels are assessed in accordance with BS4142, but recommends assessment periods outside of the standard. Therefore, to be able to assess the noise in accordance with BS4142, the time periods of 07:00 to 23:00 and 23:00 to 07:00 will need to
be used, and not those proposed in the policy. Similarly by setting the noise levels as a rating level, will already include any tonal, impulsive or character correction for the noise source. BSBS4142 is the accepted method for assessing industrial and commercial sound and alternatives would be very difficult to justify.

The following alternative wording will ensure that noise from any non-residential development will not have an adverse impact on nearby residents.

“The rating level of all activities of any non-residential or process, including external plant (singly or in combination), loading and unloading of goods and sound from mobile plant, shall not exceed background noise levels at any time of the day or night, when assessed in accordance with BS4142:2014 Methods for rating and assessing industrial and commercial sound at any noise sensitive property.”

Officers would be happy to discuss the wording and operation of this policy before drafting the final version if that would be of benefit.

**S1 Sustainable large development**

Whilst the objective behind the policy is understood this policy appears to take a stronger stance than the NPPF and in practice may be difficult to operate.

Developments are required to directly address the impact of their proposals, not to provide an overall gain, although this may in effect be the outcome.

In particular the definition of and justification of a contribution towards social infrastructure may be difficult to operate. The Parish Council will have some flexibility in terms of CIL contributions to engineer a gain in social or environmental benefit, as they see fit. Could it be justified that a housing proposal for 10 dwellings had to provide a net gain in employment/economic benefit? Whilst the objective behind the policy is understood, in itself it goes further than the NPPF and is unlikely to be justified or effective, or reasonable.

**DR1 Foul and Surface water drainage.**

1. Review by an independent chartered engineer is not an acceptable requirement. If a plan works then it works regardless of who has reviewed or designed it. By and large any development within the Plan area (with the exception of that in Policy D3) will be infill development likely to be of one or two houses or subdivision of existing and whilst taking a SuDS approach on small scale development is preferred, it is not mandatory. The policy should be reworded to reflect this.
2. Full online back up for pumped schemes is likely to be unachievable and unrealistic for a single dwelling. Independent power supplies and shared ownership maintenance/funding scheme would be expected however for major development sites and could be realistic for development subject to policy D3 was largely residential.

Officers would be happy to discuss the wording and operation of this policy before drafting the final version if that would be of benefit.

9 Highways and travel policies

T1 Highways and transport
It would be useful to summarise the evidence which is included in the appendices in justification for the policy in terms of vehicle speeds, highway/footway geometries including reference to any accident statistics at the locations identified.

T2 Highway safety
Reference could be made to Core Strategy policy CS10 as the higher order policy which supports these aims.

T3 Vehicle parking
Should also ideally reference the NSC Parking Standards SPD

10 Community and facilities policies

LS1 –Local Shops
It is assumed this policy is envisaging small scale farm diversification, either selling home produced goods or a low key retail outlet appropriate to the location. It may be useful for the policy to give an indication of the scale of facility to avoid pressure for larger shops unsuited to a rural location, given that a concern of the Plan is to avoid unsustainable development giving rise to unnecessary trips. This could be done by reference to Development Management (sic) Policy DM67 which reflects the requirements of Core Strategy policy CS21 and considers small scale retail development to be up to 200m2 floorspace, but you may not consider this appropriate either and prefer to give some explanation of what is meant by “local shop”.

CF3 New Community Facilities. A shop would not normally be classed as a community facility (which is generally D1 uses). Query whether the policy is needed as both uses have been included within para 5 of D3. Could the fifth bullet point be reworded to specify this if a medical facility is considered a priority? Youth facility could also be included in the examples of appropriate D1 uses as they have separate policy. See North Somerset Council
11 Environment policies

The environment policies are supported in principle. However they could be made more effective by re-adjusting some of the wording for example as follows:-

**Env1.1** – separating out designated sites (which have a strong level of protection already) and habitats (not necessarily protected) that support protected and notable species – that should be enhanced.

**In Env1.2** – making reference to ‘favourable conservation status’ rather than ‘species abundance’,

**Env1.3** - this could be reworded also to reference the draft technical guidance on bat SAC, highlighting juvenile sustenance areas (pasture areas).

**Env3.1**, perhaps add that species planted are native, of local province.

Officers would be pleased to discuss revisions to the wording of these policies in more detail.

**ENV4 Local Green Space**

The final paragraph of this policy may go beyond the scope of planning policy in relation to the agricultural/other management of the land. The question of access will also need to be the subject of separate agreement with the landowner in question and is beyond the scope of planning policy to dictate. The designation of Local green Space is a protection on par with Green Belt and its intention is to protect the land against alternative development. It does not confer access rights or any other protection against activities/actions which would not require planning consent.

**R1 Renewable and low carbon energy generation**

This policy meets the necessary tests as worded, however consideration could be given to referencing Sites and policies DM policy DM2 renewable and low carbon energy or to incorporate the following wording if considered beneficial “support to local community-based schemes which offer direct benefits to local residents”. This may encourage more locally beneficial proposals. The Sustainable Buildings and Places SPD talks about technologies which may suit different circumstances and it may be useful to reference this.

12 Funding policy
North Somerset Council is working to implement a Community Infrastructure Levy, which it hopes will be operational from summer 2017.

The proposed rate for residential development in the Claverham area is £80/sqm. This rate will be subject to consultation and public examination before it can be confirmed. Claverham Parish Council would receive 15% of any CIL income from development its area, or 25% if this Neighbourhood Plan is adopted.

A typical new build house in North Somerset is around 100sqm, therefore an estimate of CIL income from each new dwelling would be £8,000, of which the Parish Council would receive either £1,200 or £2,000. There could also be CIL income from any new build retail development.

The CIL would only apply to developments that are given planning consent after formal CIL implementation; it is not retrospective.

There are a number of nationally-set exemptions from CIL, including affordable housing, Starter Homes, self-build properties and charitable buildings.

CIL regulations do not require the Parish Council to set its spending proposals in advance of receiving CIL income, but there are benefits to including proposals in the Neighbourhood Plan as it gives local people the chance to comment and agree priorities. It may be worth considering whether it would be useful to amend the policy to allow for changing priorities in the future.

In spending any CIL income, the Parish Council must demonstrate that their spending is:

- ‘to support the development of the local area by funding
- (a) the provision, improvement, replacement, operation or maintenance of infrastructure; or
- (b) anything else that is concerned with addressing the demands that development places on an area.’

The proposals in the draft Neighbourhood Plan appear to have the potential to meet these criteria, but ultimately the decision and responsibility will need to be taken by the Parish Council. The Parish Council is advised to check the CIL Regulations 2010 and National Planning Policy Guidance for further information about the regulations around CIL expenditure, in particular the NPPG at: http://planningguidance.communities.gov.uk/blog/guidance/community-infrastructure-levy/spending-the-levy/
If you would like to discuss any of the points raised with either myself or appropriate North Somerset Council officers then please let me know and I can pass on contact details.

Yours sincerely,

Celia Dring
Principal Planning Policy Officer
7.3 Commentary From Tom Leimdorfer in role as: Trustee and Clerk of Management Committee - Claverham Meeting House Trust

Given here verbatim

From: "Tom Leimdorfer" <leimdorfer@care4free.net>

Date: 26 July 2016 at 22:27:51 CEST

To: "'Claverham Future'" <claverhamfuture@gmail.com>, "'Nigel Cooper'" <nigel@nigelcooper.com>, "'Teresa Moore'" <teresamoore1@yahoo.co.uk>

Cc: <info@claverhamfuture.org.uk>, <Celia.Dring@n-somerset.gov.uk>

Subject: RE: Claverham Neighbourhood Plan: Pre-Examination Consultation

Dear Nigel and Teresa

Thank you for drawing our attention to the draft Claverham Neighbourhood Plan. I am responding on behalf of the Claverham Meeting House Trust.

I wish to congratulate you and other members of the Claverham Future Steering Group on completing the painstaking work of compiling the evidence, conducting the consultations and preparing a sound and succinct document, which should be a good basis for your Claverham Neighbourhood Plan. Having been involved with the Congresbury Character Statement (1998) and Parish Plan (2006) exercise and being currently involved with the early stages of the Congresbury Neighbourhood Plan steering group, I know something of what is involved.

From the viewpoint of the Claverham Meeting House Trust, I have the following comments:

Objective 6  Retention of heritage assets, locally important buildings, structures and their settings (also 11.2)

Objective 5  Improved community facilities

Claverham Meeting House is a Grade II* listed building (as noted in the Document) and recognised as being unique in its Georgian (1729) construction as a Quaker Meeting House with provision for accommodation for a Friend in need. Today, the Meeting House is owned by an independent Quaker Trust. It is still a place of worship as Quaker meetings are held once a month. However, the premises are used by both Quakers and non-Quakers for a
wide variety of purposes, which bring visitors to Claverham from far and wide. These are drama and workshops, art course and exhibitions (including North Somerset Arts Week), environmental activist courses and retreats, women’s groups, young people’s groups. These are both day and residential events. In addition, families and individuals use the cottage for short holiday breaks or retreats. So the activities at the Meeting House, cottage and Barn (also grade II* listed) contribute to the wider life and ‘economy’ of the village. Some local residents have attended events and meetings for worship at the Meeting House. It should also be noted that the memorial stones in the burial ground are of historical interest to many local families.

**Objective 4** Improved highway safety for all users (also 9.1 T1 & T2)

We are very concerned about the speed of traffic (including some farm vehicles) using Meeting House Lane. The lane is used by pedestrians walking dogs, horse riders and cyclists as well as motorised traffic. Some cars have been observed driving at irresponsible high speeds. Visibility round bends is limited and vehicles often need to come to a sudden stop to reverse to a passing place or to allow horses to pass. If a 20 mph limit is considered for parts of the village, it should include Meeting House Lane. At the very least, SLOW signs should be painted at approaches to bends and also at the approaches to the drive of the Meeting House.

Best wishes for the next stages of your Neighbourhood Plan.

Kind regards

Tom

Tom Leimdorfer
Trustee and Clerk of Management Committee
Claverham Meeting House Trust
01934 834663; leimdorfer@care4free.net
www.claverhammeetinghouse.org.uk
7.4 UTC: Claverham Future comments (drafted by Cushman Wakefield)

27 July 2016
Claverham Future
c/o The Clerk
Yatton Parish Council
48 High Street
Yatton
Bristol
BS49 4HJ

Sent via email and post

Dear Sir/Madam

UTC AEROSPACE SYSTEMS
CLAVERTON NEIGHBOURHOOD PLAN PRE-EXAMINATION CONSULTATION

INTRODUCTION

On behalf of UTC Aerospace Systems (UTAS), we are pleased to make comments on the emerging Claverham Neighbourhood Plan.

UTAS is one of the world’s largest suppliers of technologically-advanced aerospace and defence products, employing over 40,000 people worldwide. The company operates out of 12 sites in the UK and it is owner and occupier of the large employment site on the eastern side of Claverham, identified in the emerging Neighbourhood Plan as an ‘Employment Zone’ and potential ‘Mixed Use Site’.

The site at Claverham comprises a collection of utilitarian buildings covering a high proportion of the site, along with associated areas of hardstanding and car parking. There are also two Grade II listed buildings located on the site, Court de Wyck former manor house and its associated chapel. The site boundaries comprise trees and hedgerows of varying depth and there are also landscape features within the curtilage of the listed buildings on site.

The site will be vacated in autumn 2017 as the business intends to consolidate its operations elsewhere in UK.

UTAS welcomes the content of the emerging Neighbourhood Plan as an important step towards the provision of an up-to-date local planning policy framework on which it can plan for the sustainable future of the site as part of Claverham’s community. It is hoped that Claverham Future will find the firm’s comments constructive and helpful.

RESPONSE TO CONSULTATION

6.2 Objectives

In respect of Objective 1, UTAS acknowledges that Claverham is not a location that can sustain significant new development over the Neighbourhood Plan period. However, the Plan should acknowledge support for development that contributes to a strong, vibrant, and healthy community and a robust, responsive, and competitive local economy. This should include new housing development that can help sustain accessible local services, including rural public transport, and which accords with the other stated plan ‘Objectives’. Such development at Claverham will be inherently sustainable.
UTAS considers that Objective 1 should be re-drafted based on specific priorities identified in the National Planning Policy Framework (NPPF), particularly to reflect the presumption in favour of sustainable development and encouragement for re-using brownfield land.

As part of Objective 1, UTAS welcomes the Plan's support for development at its current brownfield Site, it being the principal opportunity to address local development needs over the plan period in a sustainable way.

UTAS fully supports Objectives 2 – 9.

**8.1 D1 - New Development**

UTAS encourages the Plan's support for large-scale development at its current Site and welcomes the chance to secure a sustainable future for the Site as part of the existing community. As acknowledged above, the Site will become surplus to the company's requirements in the short-term, therefore enabling disposal and sustainable redevelopment of this brownfield site over the Plan period.

Given the presence of the Site, UTAS considers that Policy D1 should be re-phased (first sentence) to acknowledge that proportionate new development within the Plan Area is achievable in line with the NPPF and Development Plan policies that provide a presumption in favour of sustainable development and which encourage re-use of previously developed land (i.e. not all new development in the Plan Area is ‘demonstrably unsustainable’).

Reference to the potential difference (‘no net difference’) in carbon emissions arising from the redevelopment of the Site should be removed as this will depend on a wide range of issues associated with the scale and nature of development proposed, as well as external influencing factors. Material considerations such as changes in traffic generation would be properly considered on the basis of appropriate evidence at the planning application stage.

**8.3 D3 - Creation of Mixed Use Site or Continued Employment Use**

Paragraph 1 and 5

Emerging Policy D3 indicates that the Site shall either be retained as an ‘Employment Zone’, or be re-designated to ‘Mixed-use’ (defined as including dwellings, improved community facilities, and one or more of a number of other identified uses).

UTAS supports the identification of its Site for mixed use. Mixed-use development is promoted in the NPPF as a ‘Core Planning Principle’ (Paragraph 17), notably as a means to encourage multiple benefits from the use of land in urban and rural areas. In this regard, a mixed-use allocation will provide flexibility to redevelop the Site for a range of potential uses in support of the local community and its future wellbeing. This will include the ability of the Site to make a valuable contribution towards prevailing housing requirements.

The Site is isolated from other key employment activity and it is not an attractive location for investment in new employment facilities. It is highly unlikely that the Site as a whole concern will be attractive to the market for alternative B-class employment uses, based on recent experience and our knowledge of local industrial and employment markets. Importantly, redevelopment of the Site as a whole provides modern, flexible and attractive business premises is unlikely to be viable and thus secure the necessary investment. Accordingly, any future B-class employment use on the Site is only ever realistically likely to be a component part of a mixed-use redevelopment scheme that can generate sufficient overall site value (i.e. subject to viability as part of a housing-led redevelopment of the Site).

Limiting the allocation of the Site to ongoing employment use only may unduly sterilise the Site and restrict the extent to which it can play a valuable part in sustaining and enhancing village life and prosperity.

Housing delivery continues to be one of the Government's key priorities – evident through recent Ministerial announcements and planning reforms. The recent Housing and Planning Act focuses on planning being a key mechanism to drive up the rate of house building in England, particularly on
brownfield sites. The recent consultation on proposed changes to the NPPF further confirms the importance of the planning system in helping to achieve sustainable development and supporting the delivery of the high quality new homes that the country needs. It is also proposed to make it clearer in national planning policy that substantial weight should be given to the benefits of using brownfield land for housing (in effect, a form of ‘presumption’ in favour of brownfield land), and to make it clear that development proposals for housing on brownfield sites should be supported, unless overriding conflicts with the Local Plan or the NPPF can be demonstrated and cannot be mitigated. This is in line with the Government’s ambition for 90% of brownfield land suitable for housing to have planning permission by 2020. Housing is clearly a suitable re-use of the Site.

The potential for the Site to support other uses, including community uses, will depend on local demand and market/operator interest. For example, whilst a new medical facility may be identified as a suitable use in the Plan (Policy CF3), experience has shown that there is not always local interest in operating such a facility. Similarly, there is very little demand for new shops in villages. As such, it may be difficult to viably incorporate such facilities into the redevelopment of the Site and Policy D3 should not be prescriptive in this regard, only supportive.

Overall, the Site is considered suitable for residential redevelopment and any continuing employment-generating use of the Site is only likely to be small-scale having regard to likely investor and occupier interest, which in the short- to medium-term is likely to be limited. The provision of other uses will be dependent on identifiable local needs and viability.

Accordingly, UTAS commends the Site’s allocation for residential-led mixed-use development, with the flexibility to incorporate employment and other identified uses, as listed in the draft policy. However, employment provision and delivery of specific other uses should not be a binding requirement of the Site’s redevelopment as this could delay the provision of much needed housing and potentially other uses of value to the community.

8.4 S1 – Sustainable Large Development

UTAS supports the intentions of this policy in terms of it seeking to ensure redevelopment of the Site is sustainable. However, this policy is considered unnecessary. In its present form, Policy S1 is vague and if it is to be retained, it should be re-drafted to better reflect the NPPF and associated Planning Practice Guidance, incorporating the presumption in favour of sustainable development. Any specific development requirements should be precise and will be better identified in controlling Policy D3.

10.2 LS1 – Local Shops

For consistency, this policy should be amended to reflect the fact that shops are identified as a suitable use in relation to the Site (Policy D3).

CONCLUDING REMARKS

We trust these representations will be viewed as constructive and helpful. We shall be pleased to discuss the matters raised in these representations with Claverham Future Steering Group.

Yours faithfully,

Chris Hayes
Director
UK Development, Planning
7.5 YACWAG Comments

On 6 July 2016 at 09:47, Faith Moulin <moulins68@icloud.com> wrote:

Hello

The following comments are made on the Claverham Neighbourhood Plan, third draft as accessed through the Yatton Parish Council website. We have only read and commented on the Environment Policies, Section 11.

11.3.1 endorses NSC policy but the important thing would be to identify trees which are particularly at risk from any form of development. The NP should have this level of detail.

11.3.2 is a general policy which replicates that of the Core Strategy. What is important would be to identify those hedgerows which are specifically important, particularly ones used as bat flyways. An ancient hedge cannot be replicated by the planting of new lengths of hedge because the siting is critical, as well as the eco-system which has developed in the old hedge.

11.4 We would suggest an additional LGS - land between Franklins Way and the industrial complex formerly Claverham Limited should be maintained as a buffer because it has significant value as a wildlife corridor.

Yours

Tony and Faith Moulin

Yatton and Congresbury Wildlife Action Group
A second Comment was received from **YACWAG**:

Faith Moulin

08:05 (14 hours ago)

to info

The important tree belt between residential development and the industrial site at the rear of Franklins Way should be maintained as a wildlife corridor and habitat.

Tony and Faith Moulin
7.6 Cleeve Parish Council

CLEEVE PARISH COUNCIL
Gemma Richards – Clerk to the Council

1 Graitney Close • Cleeve • North Somerset • BS49 4NJ • Tel 01934 830217
e-mail: cleeveparishcouncil@hotmail.co.uk

Claverham Future

BY EMAIL: info@claverhamfuture.org.uk

27 July 2016

Dear Sir/Madam,

Thank you for your email enclosing the draft Claverham Neighbourhood Plan. Cleeve Parish Council supports the plan especially the aim to maintain its rural character along with “the clear, green, separation from Cleeve”.

Cleeve Parish Council would like to be kept informed on progress with the plan.

Kind regards,

Gemma Richards
Clerk to the Council
7.7 The Environment Agency

Claverham Future

c/o The Clerk
Yatton Parish Council
48 High Street
Yatton
Bristol
BS49 4HJ

Our ref: WX/2006/000025/OR-
16/P01-L01
Your ref:
Date: 26 July 2016

Dear Sir/Madam

CLAVERTHAM NEIGHBOURHOOD PLAN: PRE-EXAMINATION CONSULTATION

Thank you for providing notification of the preparation of the above Neighbourhood Plan, which was received on 20 June 2016.

The Environment Agency can now make the following comments relating to our interests within the boundary;

Within this plan are areas of Flood Zone 3 and 2 which are at high and medium probability of flooding. Flood Zone 3 has an indicative annual probability of flooding in 1 in 100 years or less from river sources (i.e. it has a 1% or greater chance of flooding in any given year).

We would recommend that new development does not occur within these areas and is steered to low flood risk areas. We would expect this to be encouraged through the planning process and Sequential Test as stated in the National Planning Policy Framework (NPPF).

Flood Risk Assessment’s would be required for any new development that is sited within the floodplain. The FRA would be required to demonstrate the proposal is not at risk from flooding, and that there is no increase in risk for any third parties. This would be for the lifetime of development and include an allowance for climate change. Objective 3 supports this approach.

Sustainable drainage systems/techniques (SuDs) should be used for any development to reduce runoff, improve water quality, and benefit biodiversity and aesthetics.

Please see the attached flood maps for your information.

Development may require a permit under the Environmental Permitting (England and Wales) Regulations 2010 from the Environment Agency for any proposed works or

Environment Agency
Rivers House, East Quay, Bridgwater, Somerset, TA6 4YS.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
Cont’d.
structures, in, under, over or within eight metres of the top of the bank of a ‘main river’. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. A permit is separate to and in addition to any planning permission granted. Further details and guidance are available on the GOV.UK website: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits.

River corridors should be valued for wildlife and amenity reasons.

If you wish to discuss any of the above I can be contacted on 01278 484625.

Please quote the Agency’s reference on any future correspondence regarding this matter.

Yours faithfully

Richard Bull
Sustainable Places - Planning Advisor

Direct dial 02030 250287
Direct fax 01278 452985
Direct e-mail nwx.sp@environment-agency.gov.uk
EA Flood Map Claverham
7.8 Historic England

N.B. the commentary raised at SEA/HRA stage had been incorporated at the pre submission stage document.

Stuart, David <David.Stuart@historicengland.org.uk>

16:45 (5 hours ago)

to info, Celia.Dring

Dear Claverham Future

Thank you for your consultation on the draft Claverham Neighbourhood Plan. We have few comments we would wish to offer and these can be summarised as follows:

We are pleased to note that included in the list of Objectives for the Plan is the retention of heritage assets and their settings along with the area’s rural character. The Village Character Statement is obviously the source of much valuable information which can be used to achieve this aim and inform the nature of proposals for change.

We are pleased to see too, in addition to nationally designated heritage assets, reference to Locally Important Buildings which contribute positively to the distinctive qualities of the area.

We were consulted by North Somerset Council a few weeks ago on the SEA Screening of the emerging Plan and I have attached a copy of that response for your information.

Otherwise, we congratulate your community on its progress to date and wish it well in the completion of its Plan.

Kind regards

David Stuart
We have launched four new, paid-for Enhanced Advisory Services, providing enhancements to our existing free planning and listing services. For more information on the new Enhanced Advisory Services as well as our free services go to our website: HistoricEngland.org.uk/EAS

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---------- Forwarded message ----------

From: "Stuart, David" <David.Stuart@historicengland.org.uk>
To: "'Celia.Dring@n-somerset.gov.uk'" <Celia.Dring@n-somerset.gov.uk>
Cc: 
Date: Tue, 14 Jun 2016 14:10:32 +0100
Subject: Claverham Neighbourhood Plan SEA HRA screening
Dear Celia

Thank you for your consultation on the Claverham Neighbourhood Plan SEA Screening.

The focus of our attention for the purposes of this exercise is draft Policy D3 which identifies criteria for future uses on the employment site in Bishops Road. This is in effect a site allocation, acknowledging at the same time that it is a brownfield site and that safeguards within the policy should ensure that the significance of heritage assets is preserved (note: criterion 4. in the policy refers to the Listed Buildings in the site being maintained and if this is intended to mean retained it could state this to make its meaning clearer. If the meaning is meant to imply securing a viable use and long-term physical maintenance as part of any integrated approach to the site this could be clearer too. Similarly we assume that the settings of relevant heritage assets are to be preserved.)

On this basis we are happy that the policy, its criteria and other local and national policies for the protection and enhancement of heritage assets should avoid significant environmental effects in the form of harm (at the same time, such effects could be positive and if significant could conceivably still trigger the need for an SEA).

So while the evidence documents contain an impressive schedule of heritage assets and description of historic character the absence of any assessment of potential impact on them arising from D3 is understandable as this has been deferred to the post-Plan stage when proposals are being worked up and considered against those criteria referred to.

On a couple of points of detail relating to the Screening Report itself:

- Stage 8 of Table 1 asserts that “no development is proposed in locations which would have a significant adverse effect on heritage assets...”. We assume this is predicated on the safeguards referred to above.
- Criterion (2) of Table 2. We note the statement that the cumulative effects of the Plan cannot be predicted but appreciate that individual proposals can be influenced using the same safeguards to ensure that significant environmental effects will be unlikely.
• Criterion (2)f)(i) of Table 2 states that none of the Plan policies or proposals will have a direct influence on nationally or locally designated areas or buildings. However, D3 makes specific reference to listed buildings within the site and it appears that, for example, Court de Wyck and the nearby Former Chapel (both Grade II) may be near to or within the site. It would therefore seem likely that policy D3 will have a direct influence on these designated assets, albeit what is intended to be a positive one.

Overall, however, we accept that these are points of detail or clarification and therefore have no objection to the view that an SEA is not required.

Kind regards

David

David Stuart | Historic Places Adviser South West

Direct Line: 0117 975 0680 | Mobile: 0797 924 0316

Historic England | 29 Queen Square | Bristol | BS1 4ND

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From: Celia Dring [mailto:Celia.Dring@n-somerset.gov.uk]

Sent: 17 May 2016 11:47

To: nwx.sp@environment-agency.gov.uk; consultations@naturalengland.org.uk; South West Casework

Cc: Grundy, Amanda (NE)

Subject: Claverham Neighbourhood Plan SEA HRA screening
Please find attached a report which sets out the Strategic Environmental Assessment screening and Habitats Regulation Assessment screening exercise which has been undertaken by North Somerset Council for the draft Claverham Neighbourhood Plan.

In accordance with the SEA and HRA regulations your organisation is a statutory consultee for this process. I therefore would welcome your comments as to whether you share this Councils view that neither a full SEA or HRA is required for the draft Claverham Neighbourhood Plan.

This is a draft version of the plan which will shortly commence its first period of community consultation.

You can view the draft plan here.


There are also three evidence papers.

http://claverhamfuture.org.uk/evidence/

Please could you respond by Tuesday 14 June 2016.

Kind regards,

Celia

Celia Dring

Principal planning policy officer

Development & Environment

North Somerset Council
Tel: 01934 426244

E-Mail: Celia.Dring@n-somerset.gov.uk

Post: Town Hall, Walliscote Grove Road, Weston-super-Mare, BS23 1UJ

Web: www.n-somerset.gov.uk

________________________________________

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7.9 Congresbury Parish Council

Clerk - Congresbury Parish Council <clerk@congresbury-pc.gov.uk>

to info

Congresbury Parish Council Planning Committee agreed a response on the meeting 25 July 2016 which states ‘Congresbury Parish Council commend Claverham Future group for a well-considered document and that the Parish Council supports the policies in the outlined draft document.

If you have any queries please do hesitate to contact me.

Liz Greaves
Clerk to Congresbury Parish Council
Phone: 01934 838802
Email: clerk@congresbury-pc.gov.uk
Website: www.congresbury-pc.gov.uk

(Please note my working days are Monday, Tuesdays and Fridays 8.30am – 5pm)

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7.10 **Gladman - Development Agents and Applicants via Carter Jonas for Large Scale Housing North of Chestnut Drive outside of Settlement Boundary application 15/P/0185/O**

The following 25 page document was received following due notification of the land owners of the above application site.
Claverham
Neighbourhood Development Plan
Pre-Submission Version

August 2016
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APPENDICES

Appendix 1 Location Plan
2 LEGAL REQUIREMENTS, NATIONAL POLICY & JUDGMENTS

2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum, it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the CNP must meet are as follows:

a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order;

b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;

c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;

d) The making of the order contributes to the achievement of sustainable development;

e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area); and

f) The making of the order does not breach, and is otherwise compatible with, EU obligations.

2.2 National Planning Policy Framework

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

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

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

2.2.5 Paragraph 49 of the Framework is clear that relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites. This applies not only to statutory development plan documents but is also applicable to both emerging and ‘made’ neighbourhood plans. This has also been confirmed in the High Court (see section 2.4.1).

2.2.6 Paragraph 184 of the Framework makes clear that the ambition of the neighbourhood plan should be aligned with the strategic needs and priorities of the wider area. To facilitate this, local planning authorities (LPAs) will need to set out clearly their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. Where a neighbourhood plan proceeds in advance of the adoption of a Framework-compliant Local Plan, this will create uncertainty as to whether the neighbourhood plan provides an appropriate basis for the spatial approach contained in its administrative area.

2.3 Planning Practice Guidance

2.3.1 It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

2.3.2 On 11 February 2016, the Secretary of State (SoS) published a series of updates to the Neighbourhood Planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan. In particular, the changes to the PPG stress the importance of considering housing reserve sites and providing indicative delivery timetables to ensure that emerging evidence of housing needs is addressed in order to help minimise any potential conflicts that can arise and are not overridden by a new Local Plan. In this circumstance we refer to any future review of the Local Plan.

2.3.3 Paragraph 040 of the PPG is of particular importance and states that:

Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, those policies should take account of latest and up-to-date evidence of housing need. In particular, where a qualifying body

\footnote{PPG Paragraph 040, Reference ID: 41-040-20160211}
2.3.4 On 19 May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such, it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention and provided a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

2.3.5 Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. Accordingly, the CNP will need to be updated so that it takes into account the latest guidance issued by the Secretary of State so that it can be found in compliance with basic condition (a).

2.4 High Court Judgments

Woodcock Judgment

2.4.1 The Woodcock High Court judgment demonstrates the implications for progressing a neighbourhood plan where there is no local plan in place nor a five-year housing land supply. In summary, this High Court judgment demonstrates the following key points:

- That §14 and §49 of the Framework in regard to five-year housing land supply and the weight to be given to extant housing land supply policies apply equally to both emerging and ‘made’ neighbourhood plans as other development plan documents otherwise adopted and/or emerging by the local planning authority;
- There is nothing in policy or statute that elevates neighbourhood planning to a level above the wider development plan that enables special consideration;
- Neighbourhood plans must respect national policy and the core planning principles outlined within the Framework; and
- Prematurity must be assessed against the whole of the requirements of the PPG. In neighbourhood planning, there is no requirement for planning bodies to produce an objective assessment of housing needs, as there is no requirement to consider the effectiveness or justification of a plan.

Crownhill Judgment

2.4.2 On 21 January 2018, judgment was handed down in the High Court in Crownhill Estates Limited v Chichester District Council [2016] EWHC 73 (Admin). This judgment sets out the relevant legislation and principles that are required to be achieved in order to progress a neighbourhood plan.

2.4.3 Crownhill was not subject to a further appeal to the Court of Appeal and therefore represents the most recent judgment of the High Court on neighbourhood planning. However, this judgment does
not mark the end of policy development in this area, nor is it a definitive constraint on the exercise undertaken by a neighbourhood plan examiner.

2.4.4 It is important to note that the PPG was drafted following the judgment in Crownhall and therefore remains a material consideration for the purposes of basic condition B(2)(a) and indeed assessment of B(2)(d) and (e).

2.4.5 Gladman is concerned that the Plan’s wider aspirations may fail to be delivered as a consequence of not ensuring that sufficient housing land is made available for development to help contribute to the delivery of several of the neighbourhood plan’s objectives. Accordingly, CNP should not limit the sustainability potential of sites located outside of the built up boundary, but give active consideration to the sustainability merits and development of greenfield land on the edge of Claverham, such as land north of Chestnut Drive, to deliver sustainable growth to assist North Somerset Council (NSC) in meeting its full objectively assessed need for housing. The delivery of this site for housing will enable the delivery of much needed housing, whilst encompassing wider community benefits such as increased public open space provision and affordable housing. Further details of the planning benefits of the scheme are set out in section 6.1 of these representations.

DLA Delivery Judgment

2.4.6 DLA Delivery Ltd sought to challenge the Newick Neighbourhood Plan on a series of grounds including a failure to observe the European Habitats Directive, failure to have regard to national planning policy and the ability of a neighbourhood plan to come forward ahead on an up-to-date Local Plan. On 31st July 2015 the Foskett J handed down judgment1 and dismissed the challenge.

2.4.7 However, Lord Justice Lindblom has since granted DLA Delivery permission to the Court of Appeal on all grounds, including that a neighbourhood plan should not determine the level and allocations in an area before an up-to-date, Framework-compliant Local Plan has been adopted.

2.4.8 This will be the first neighbourhood planning case to be heard at the Court of Appeal and will explore some of the fundamentals of neighbourhood planning. The Parish Council should therefore be mindful of this judgment and the implications it may have on the progress of the CNP.

Richborough & Hopkins Homes Judgment

2.4.9 The recent case of Suffolk Coastal District Council v Richborough & Hopkins v Cheshire East was handed down by the Court of Appeal in March 2016. It is informative on policies relevant to the supply of housing and the wider interpretation that is now to be placed on §49 of the Framework.

2.4.10 The CNP is progressing at a point in time where it is considered that the Council is unable to demonstrate a robust five-year housing land supply position. Unless the housing land supply position improves at a rapid rate, then the Plan will be progressing at a point in time where the policies relevant to the supply of housing will be found out-of-date upon the making of the Plan. This reinforces the need for the CNP to provide a significant degree of flexibility in order to assist

---

1F(DLA Delivery) v Lewes DC [2015] EWHC 331 (Admin)
NSC in meeting its full OAN whilst maintaining a robust and continuously rolling five-year housing land supply.
3 DEVELOPMENT PLAN

3.1 Adopted Development Plan

3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, a Development Plan should be prepared to conform to up-to-date strategic policy requirements set out in the adopted Development Plan.

3.1.2 The current Development Plan relevant to the preparation of the CNP consists of the Core Strategy (Adopted April 2012) and provides the overarching spatial strategy for development in the district to 2026. It should be this document that the CNP should seek to support and meet.

3.1.3 It is not appropriate for the CNP to seek to introduce new policies that do not have regard to the strategic policies contained in the adopted Development Plan.

3.2 Emerging Site Allocations and Policies DPD

3.2.1 Part 1 of the emerging Site Allocations and Policies DPD (SAPDP) sets out NSC’s Development Management Policies. Due to the (then) uncertainties over new housing allocations to meet the increased housing requirement, it was agreed by Executive on 9th December 2014 that the Council’s Development Management Policies be taken forward in advance of the remainder of the Site Allocations Plan (SAP).

3.2.2 Part 1 of the SAPDP covers a range of issues including development in the green belt, major transport schemes, conservation areas, development in the countryside etc. The Examination of the Part 1 Plan is now complete, and on 19th July 2016 was adopted by NSC.

3.2.3 Policy DM68 provides an alternative use for this land subject to the criteria attached to DM68. Accordingly, Policy ENV4 will not be in conformity with the Development Plan once the Part 1 Plan is adopted.

3.3 Core Strategy – Remitted Policies

3.3.1 Following a successful legal challenge in the High Court, a number of policies have been remitted back to the Planning Inspectorate for re-examination, Policy CS14 (distribution of new housing) and Policy CS33 (smaller settlements and countryside). These policies are currently in the process of re-examination. Consequently, given that strategic housing policies in the Replacement Local Plan are no longer saved following the adoption of the Core Strategy, the development plan is currently silent on the location of new housing. It is also of relevance that the overall housing requirement outlined in the re-adopted Policy CS13 is not predicated on a full Objectively Assessed Housing Need, as required by national policy. Accordingly, due to the level of unresolved objections raised at the Examination in Public, Gladman would advise the Parish Council to ensure sufficient contingency measures are included within the CNP going forward. Failure to do so may result in the Plan being found contrary to basic condition (a).
3.4 Emerging West of England Joint Spatial Plan

3.4.1 The four authorities of Bristol, North Somerset, South Gloucestershire and Bath & North East Somerset (BANES) are working together to produce a Joint Spatial Plan (JSP) with the specific objective of ensuring that the West of England’s housing and employment needs are met.

3.4.2 The JSP intends to set out the strategy to meet the needs of the Wider Bristol Housing Market Area (HMA). The JSP Issues and Options consultation (November 2015) outlines an OAN as being 85,000 dwellings over the plan period to 2036 excluding BANES based on the findings of the Wider Bristol HMA SHMA produced by Opinion Research Services (ORS) in July 2015.

3.4.3 Gladman would be concerned if YPC used this latest evidence on housing needs as there is considerable uncertainty regarding whether or not it identifies the HMA’s full OAN and will also need to be updated to take into account the 2014 Household Projections. At present, it is currently uncertain how the JSP will seek to deliver the HMA’s full OAN and whether Claverham may need to accommodate any further growth to support this objective. Accordingly, the CNP should include a mixture of measures to allow for a significant degree of flexibility that it currently does not allow for. In this regard, we advise the use of housing reserve sites to minimise any potential conflict that may arise so that the CNP is not ultimately superseded by the provisions of s38(5) of the Planning and Compulsory Purchase Act 2004. This will provide certainty that the CNP will not be out of date in the event that additional housing land is required in the neighbourhood area in order to assist NSC in meeting its full OAN.
4 CLAVERHAM NEIGHBOURHOOD PLAN

4.1 Context

4.1.1 These representations are made in response to the current consultation on the pre-submission version of the CNP, under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This section highlights the key points that Gladman would like to raise with regard to the content of the CNP as currently proposed.

4.2 The suitability of the Claverham Neighbourhood Plan Area to support growth

4.2.1 The CNP should seek to promote the aspirations of meeting identified housing needs, together with the ethos advocated by the Framework which seeks to enhance the vitality and viability of settlements across the country. The CNP should seek to promote these interests and apportion meaningful growth to ensure that the sustainability of Claverham continues for future generations.

4.2.2 As discussed earlier in section 3 of these representations, NSC’s currently adopted housing requirement (as outlined in policy CS13 of the Core Strategy) is not based on a full OAN. The emerging JSP will disaggregate the identified HMA OAN to the individual districts and NSC have already conceded at the recent Remitted Policies Examination in Public that this will inevitably lead to an increased housing requirement for North Somerset.

4.2.3 The district’s towns and villages will play a pivotal role in accommodating some of the residual housing needs of the district and the CNP should therefore ensure that it takes a positive approach to future development to assist NSC in delivering its OAN for housing.

4.2.4 Claverham is connected to, and forms part of, the Parish of Yatton. NSC acknowledge the sustainability of Yatton in the Settlement Function and Hierarchy Topic Paper, which establishes that Yatton contains many of the essential services needed to make a village sustainable, including a pub, community hall, village shop, primary school, GP surgery, post office, youth centre, library, dentist, opticians, bank, train station etc.

4.2.5 As identified in section 4 of the CNP, Claverham is host to a range of its own facilities such as a primary school, village hall, post office, cafe, a pizza outlet and a hair salon. Accordingly, it has the benefit of its own services and facilities and access to a range of other services in the neighbouring settlement of Yatton.

4.2.6 Taking account of the need to deliver housing to meet the national policy imperative which seeks to ‘significantly boost the supply of housing’, Claverham has taken little growth over recent decades because of considerable planning policy constraints and persistent under-delivery of much needed housing. Indeed, some of the housing allocations of the Replacement Local Plan across the District have yet to be delivered.
4.2.7 In light of the above, the suitability of Claverham to support future sustainable growth means that it should seek to accommodate some of NSC’s housing needs and it is evident from the above that Claverham forms part of the wider Yatton Parish which contains a vast array of services and facilities capable of achieving this objective.

4.3 Vision and Objectives

4.3.1 Gladman does not consider the CNP’s vision and objectives to be an appropriate basis for meeting housing needs over the plan period to 2026. Although paragraph 157 of the Framework specifically refers to Local Plans, as a document that will form part of the Development Plan it is not considered that the CNP to be drawn up over an appropriate time scale to take account of the longer term requirements. Instead, the CNP’s vision seeks to maintain the status quo to the benefit of existing residents for the next 10 years without due regard to the changing needs of the existing population or the housing needs of future generations. The visions and objectives make no real commitment to delivery any meaningful growth and therefore conflict with the ethos of the Framework and the community’s wider aspirations.

4.3.2 The objectives of the CNP set out what infrastructure improvements are desired. However, there is no mechanism in the Plan that will enable the delivery of desired infrastructure provisions, particularly as the plan does not provide any certainty that the redevelopment of the existing employment zone will come forward. As such, this brings into question the ability of the CNP to deliver its objectives.

4.4 Neighbourhood Plan Policies

4.4.1 This section of the representations highlights policies which need to be addressed and amended through modification and/or deletion, should the plan progress to post-submission consultation.

Policy D1 – New Development

4.4.2 Policy D1 is not considered to be appropriate or consistent with the requirements of national policy. It states that “new development within the Claverham Neighbourhood Plan Area is demonstrably unsustainable requiring considerable carbon emissions, in excess of better placed locations, to access every day facilities.” As demonstrated in section 4.3 of these representations Claverham contains all the essential services and facilities needed to support future sustainable growth opportunities. This policy would not only preclude the delivery of sustainable growth located on the edge of Claverham but it would also act to prevent the delivery of any infill development.

4.4.3 Policy D1 makes a nominal provision for housing development through the redevelopment of the existing Employment Zone for mixed use development. Gladman also question how YPC have arrived at the decision in determining that land at Bishops Road is a sustainable location for growth.
given that no comparative assessment of alternative options has been undertaken, contrary to the advice contained in the PPG1.

4.4.4 Policy D1 is not in accordance with basic conditions (a), (d) and (e) and should be deleted.

Policy D3 - Creation of Mixed Use Site or continued employment use

4.4.5 This policy states that the site “shall either be retained as an Employment Zone or be re-designated from an Employment Zone to Mixed Use.” This site is currently occupied and therefore results in significant uncertainty whether site will ever become available for mixed use development.

4.4.6 Policy CS20 of the adopted Core Strategy seeks to provide at least 10,100 additional employment opportunities to 2026 and seeks to prioritise the reuse of previously developed land and the safeguarding of sites in existing economic use to achieve this objective. It should be noted that the Framework only ‘encourages’ the effective use of land and does not seek to prioritise it.

4.4.7 Policy DM56 (Employment development on previously developed land in the countryside) of the recently adopted Sites and Policies Plan Part 1: Development Management Policies Plan states the following:

The partial or complete redevelopment of previously developed land in the countryside for economic development will be permitted provided:

- the character and appearance of the countryside is not harmed; and

- existing structurally sound buildings on the site which contribute to the rural character of the area are maintained and converted; and

- the materials, form, bulk and general design of new building is in keeping with their surroundings; and

- the location has safe and convenient access to the highway network and would not have a significant adverse impact on the highway network and

- there are no significant adverse impacts on living conditions of adjoining occupiers; and

- Redevelopment would bring significant local environmental, economic or social benefits.

Retailing, other than proposals that are strictly ancillary to the main use or proposals under 200m², will not be permitted unless they comply with Policy DM62. (Our emphasis)

4.4.8 Accordingly, Policy D1 is not in accordance with the Development Management Policies of the wider area and is therefore inconsistent with basic conditions (a) and (d). In this regard, a parallel

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1 Paragraph 642 Reference ID: 41 043-2014/306
can be drawn between the CNP and the Examiner’s Report to the Storrington, Sullington and Washington Neighbourhood Plan1 which states that:

“This site is allocated for 80 dwellings and associated development in the Plan.

This site is shown on the Horsham District Planning Framework (November 2015) (part of the development plan) as a Key Employment Area.

Policy 7 of the HDPP is a strategic policy for economic growth. Paragraph (5) states that sustainable employment for Horsham District will be achieved by:

“(5) Retention of Key Employment Areas, for employment uses.”

Policy 9 of the HDPP deals with Employment Development in more detail. Paragraph (1) reads:

(1.) Redevelopment in the Key Employment Areas must not result in the overall loss of employment floor space. Proposals for alternative uses within the Key Employment Areas will be allowed where it can be demonstrated that the sequential approach has been applied to the redevelopment of the site, and the proposals support their integrity and function as centres of employment.”

On the face of it the loss of 2.5 hectares of Key Employment Area is contrary to both of the above development plan policies. The proposals would, in my opinion clearly and fundamentally undermine a strategic policy of the development plan, contrary to paragraph 164 of the Framework. The submission plan, on its face, therefore fails to meet one of the basic conditions in this regard.

4.4.9 In this instance, the Examiner concluded that Policy 2(i) was in breach of the basic conditions as it was not in conformity of the Development Plan, failure to undertake a sequential approach to be followed for alternative uses within Key Employment Areas and that it was unsatisfactory to make the release of alternative sites when there was no certainty, even if a substantial site was found to be appropriate, that the other site would come forward as envisaged. This was but one of the issues that was contained in the Storrington, Sullington and Washington Neighbourhood Plan that subsequently resulted in the Examiner coming to the decision that the Plan failed to meet the basic conditions and was therefore unable to recommend that the Plan should proceed to referendum.

4.4.10 In light of the above, Gladman consider that Policy D3 is not in accordance with the basic conditions and provides no certainty that future housing can come forward in this location. Accordingly, the Plan is inconsistent with basic conditions (a), (b) and (d).

4.4.11 In addition, this policy to some degree, seeks to retain the existing settlement boundary with only a minor adjustment to include the Employment Zone. Gladman would be opposed to the use of a settlement boundary if this would preclude the delivery of sustainable growth coming forward. Such an approach would be contrary to the positive approach required by the Framework, specifically the need to boost significantly the supply of housing and the presumption in favour of

1 http://www.storringtonpc.gov.uk/Case/StorringtonSullington/UseFiles/Files/Examination%20Final%20Report.pdf
sustainable development. We therefore recommend that Policy D1 and D3 are deleted and replaced with a more permissive approach that considers the sustainability of a development proposal on a case by case basis consistent with the presumption in favour of sustainable development. Gladman submit the following wording for YPC's consideration:

"The Claverham Neighbourhood Plan will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

Development proposals adjacent to the existing settlement boundary will be permitted provided that the adverse impacts of development can be mitigated."

Policy S1 – Sustainable Large Development

4.4.12 This policy states that in the event of any proposed scheme having 10 or more dwelling units it must comply with and demonstrate all three elements of sustainability with relevance to Claverham.

4.4.13 In this regard, the sustainability merits of a scheme will be considered by the decision-taker. This policy as proposed lacks clarity and without further information is likely to lead to inconsistencies being made in the decision making process.

4.4.14 In response to the economic benefit, the CNP states that development proposals should 'represent net gains in long-term employment'. However, the Plan makes no replacement employment provision and even in the event that Policy D3 comes forward as proposed it would ultimately result in negative effects through the loss of existing employment land and facilities.

4.4.15 In response to the Environmental role, this policy effectively seeks to prioritise the delivery of brownfield development given that it does not accept the provision of public open space on open countryside. This is contrary to the requirements of paragraph 113 of the Framework which seeks to 'encourage' but does not 'prioritise' the re-use of previously developed land. No consideration has been given to the benefits that developing on greenfield land can bring to the local community which could include market and affordable housing, improvements to public open space, transport improvements and enhancing the existing landscape of the wider area.

4.4.16 It is also contrary to national policy as the NPPF does not require development proposals to accord with all three elements of sustainable development to be considered sustainable in the round. This has been confirmed by Inspectors in s78 appeal decisions.

4.4.17 Policy S1 is therefore contrary to the core planning principles contained in paragraph 17 of the Framework and is therefore inconsistent with basic conditions (a) and (c).

Community and Facilities Policies

4.4.18 In principle, Gladman support many of the policies contained in section 10 of the CNP which support the delivery of new facilities to the benefit of the local community. However, without any meaningful growth being allocated to support the delivery of these facilities we question whether these policies are deliverable.
Working with Yatton Parish Council to create Claverham Neighbourhood Plan

STATEMENT OF CONSULTATION

Policy ENV1 - Nature Conservation

4.4.19 Policy ENV1 seeks to protect Sites of Special Scientific Interest, nature conservations sites, farmland, species rich hedgerows, moorles and rhymes surrounding the village.

4.4.20 In this regard, sufficient weight is already afforded to the protection of sites that are of international/national importance by the requirements of the Framework e.g. Sites of Special Scientific Interest.

4.4.21 Gladman submit that Policy ENV1 is overly restrictive as there appears to be no evidence to demonstrate why all farmland beyond the existing boundaries of Claverham should be protected. Furthermore, it is noted that criterion 3 seeks to prevent the loss of habitats and/or the removal of hedgerows, which form commuting corridors for wildlife which include rare bats.

4.4.22 Gladman question the adequacy of appendix 3a which supports this policy and provides the Parish Council’s evidence regarding the upcoming Town and Village Green Inquiry. This provides the accounts of local community members who suggest that the site is a habitat for rare bat species. However, Gladman note Natural England’s letter dated 14th June 2016 in relation to the need for a Strategic Environmental Assessment which states, “In addition we are not aware of significant populations of protected species which are likely to be affected by policies/proposals within the plan.” Gladman therefore question the validity of this evidence base.

4.4.23 This policy is considered to be overly restrictive and simply serves to provide blanket protection to multiple swathes of land and there is no evidential basis to warrant this protection. The update to the FPPG makes clear that “all settlements can play a role in delivering sustainable development in the rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence”. This policy effectively seeks to designate all land outside of the settlement boundary as what would amount to ‘Green Belt by the back door’ in a manner that is expressly prohibited by the FPPG. Accordingly, if this policy is progressed it is likely to be found inconsistent with basic conditions (a), (c), (d) and (e) and should therefore be deleted from the Plan.

Policy ENV2 - Historic Environment

4.4.24 Firstly, the preservation of listed and locally important buildings and structures should be commensurate with their level of status. Secondly, in light of the judgment in FODC v SCLG and Gladman Developments Ltd. [2016] EWHC 421 (Admin), Gladman consider it necessary for the CNP to carry out an assessment of the potential impacts of proposed development on heritage assets, as set out in paragraph 129 of the Framework. The judgement concerns the interaction between paragraph 14 and paragraph 134 of the Framework, and the issues of the balancing exercise to be undertaken to assess the harm of any proposals against the benefits of identified proposed development in accordance with paragraphs 133, 134 and 135 of the Framework. Whilst these paragraphs specifically refer to local planning authorities, Gladman consider that the implications

\[1\] FPPG Paragraph 001 Reference ID: 50-001-20160519
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of the judgment apply equally to both the decision making process and the plan making process, and is therefore applicable to the preparation of neighbourhood plans. Paragraph 134 is clear in talking about development proposals, a phrase which can apply equally to planning applications and proposed allocations. It is therefore essential that the implications of the above judgment are fully considered in the context of the plan making process.

Policy ENV4 – Local Green Space

4.4.25 This policy seeks to designate two parcels of land as Local Green Space (LGS). Gladman fundamentally object to the inclusion of proposed LGS2 as it does not meet the tests required for its designation.

4.4.26 Paragraph 76 of the Framework sets out the role of local communities seeking to designate land as LGS and makes clear that the designation of LGS should be consistent with the local planning of sustainable development in the wider area. It states that:

“Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space, local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.”

4.4.27 Further guidance is provided at paragraph 77, which sets out three tests which must be met for the designation of LGS. It states that:

“The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- where the green space is in reasonably close proximity to the community it serves;
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- where the green area concerned is local in character and is not an extensive tract of land.”

4.4.28 Taking the requirements of the Framework and PPG into account, it is essential that when allocating LGS, plan makers can clearly demonstrate that the requirements for its allocation are met in full, and that they are capable of enduring over the plan period and beyond (paragraph 76). The allocation of LGS should not be used to restrict future sustainable growth.

4.4.29 Gladman submit that the proposed designation of LGS2 fails to meet all of three tests listed above. The proposed designation measures approximately 2.4ha and is therefore considered to be an
extensive tract of land. This issue has been previously explored in a number of Examiner’s Reports across the country; the following Examiner’s Reports are of particular importance:

- The Examiner’s Report to the Alrewas Neighbourhood Plan identified that both sites proposed for LGS designation ‘in relation to the overall size of Alrewas village’ comprised of extensive tracts of measuring approximately 2.4ha and 3.7ha. The population of Alrewas as recorded by the 2011 Census is 2,882. The population of Claverham itself is unknown but combined with the much larger settlement of Yatton the population stood at 7,552 in 2011. However the population of Claverham is estimated to be less than that of Alrewas. As such the issue of relativity of the size of LGS to the size of the overall size of the settlement raised by the Examiner of the Alrewas NP is applicable in this instance.

- The Examiner’s Report to the Brixworth Neighbourhood Plan recommended the deletion of three proposed LGS due to the lack of evidence supporting their designation. In doing so, the Examiner recommended the deletion of 1 LGS measuring approximately 2.7ha commenting that this comprised an extensive tract of land.

4.4.30 Essentially, the purpose of this policy is to prevent the delivery of sustainable growth at land north of Chestnut Drive. This undermines the purpose of LGS policies, which should be identified in accordance with the criteria listed in paragraph 77 of the Framework. Bullet point 3 of paragraph 77 is not met as it consists of an extensive tract of land.

4.4.31 At present, it is evident that this policy is not compliant with the Framework and the PPG, and given the uncertainty already raised regarding Policy D3, brings into question whether the Plan is able to contribute to the achievement of sustainable development.

4.4.32 Although NSC considers that it is able to demonstrate a robust 5 year housing land supply, Gladman’s hearing statements submitted to the EIP identifies that the actual housing land supply (at the time of writing) lies between 3.5 years (Liverpool and 5% buffer) and 2.6 years (Sedgefield and 20% buffer). The restrictive nature of these policies, and the overall approach taken in the CNP to development in greenfield locations, will likely have significant consequences for the ability of the Plan to assist the Council in delivering its full OAN. This has not been taken account of during the preparation of the CNP and therefore its ability to be flexible and respond to market changes in identified needs is compromised.

4.4.33 If the CNP seeks to allocate LGS then these must be made in strict accordance with paragraphs 76–77 of the Framework. Notwithstanding the fact that LGS2 fails to meet the tests, it appears that the CNP is seeking to utilise a series of policies to provide blanket protection to multiple swathes of land with no evidential basis to warrant this protection contrary to the advice and guidance contained in the PPG.

4.4.34 It is also noted that this site was formally designated as a ‘Safeguaded Site for Proposed and Structural Open Space’ under Policy CF/4 in the Replacement Local Plan (2007) but with no such development taking place to date. The land does not currently comprise any formal sports pitches or play areas and is within private ownership with no intention to develop it solely for recreational purposes. The land is not therefore available or deliverable for its currently allocated use.

4.4.35 Notwithstanding the above, Policy CF/4 allows for alternative development proposals to be made available subject to the criteria attached to this policy. Accordingly, the designation of this land as LGS is not appropriate as its designation cannot be considered to endure beyond the plan period. Policy DM68 has replaced Policy CF/4 also allows for a degree of flexibility where the partial development of a site will secure the retention and improvement of the remainder of the site for community use.

4.4.36 The delivery of land north of Chestnut Drive for residential development will provide informal public open space of up to 1ha which is not currently available within the site and so will provide a significant amount of public open space to the benefit of existing and future residents. The designation of LGS is a restrictive policy tool that would afford protection consistent with the requirements of Green Belt. As CF/4 and policy DM68 allows for alternative provision to be delivered, the proposed designation of LGS2 is not in accordance with basic conditions (a) and (e) as its designation cannot be considered to ensue over the plan period.
5 STRATEGIC ENVIRONMENTAL ASSESSMENT

5.1 Strategic Environmental Assessment/Sustainability Appraisal

5.1.1 The preparation of neighbourhood plans falls under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA) Regulations which require that a Strategic Environmental Assessment (SEA) to be undertaken where a plan’s proposals are likely to result in significant adverse effects to the environment.

5.1.2 Both the SEA Directive and Neighbourhood Planning PPG make clear that an SEA Screening Assessment should be undertaken at the earliest opportunity. The Statutory Consultees have decided that at this moment in time a SEA is not required.

5.1.3 Notwithstanding the Statutory Consultees’ decision, the PPG on SEA requirements for neighbourhood plans advises that a SEA may be required where a neighbourhood plan allocates sites for development. The Parish Council should therefore consider the benefits of preparing a SEA whilst incorporating a Sustainability Appraisal (SA). The preparation of a combined SEA/SA will help to demonstrate how the CNP does not result in adverse effects to the environment and will also demonstrate how the policies contained in the Plan contribute to the achievement of sustainable development – a neighbourhood plan basic condition. As recently demonstrated in the Examiner’s Report to the Storrington, Sullington and Washington Neighbourhood Plan, failure to ensure that the CNP contributes to the achievement of sustainable development may result in the plan being found contrary to the basic conditions and will ultimately prevent its ability to progress to referendum.

5.1.4 Should the Parish Council decide to undertake a SEA/SA, its decision making and scoring should be robust, justified and transparent. The SEA/SA should assess the effects of the neighbourhood plan’s proposals and whether they would likely result in significant adverse environmental effects when judged against all reasonable alternatives. The SEA/SA should be able to clearly justify its policy choices and it should be clear from the results of this assessment why some policies have been progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both the chosen and rejected alternatives.

5.1.5 Gladman recommends that the Parish Council seek to address this issue in collaboration with NSC to determine whether the CNP would benefit from a SEA/SA.

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7 Paragraph 016 Reference ID: 11046-20150109
6 SITE SUBMISSION

6.1 Land north of Chestnut Drive

6.1.1 The Parish Council is aware of Gladman’s land interests in Claverham at land north of Chestnut Drive. A location plan has been included at Appendix 1 of these representations.

6.1.2 Carter Jonas, on behalf of Gladman, submitted an outline planning application (reference: 15/P0185/0) for residential development of up to 85 new dwellings (including affordable housing) and associated community infrastructure. The outline planning application was subsequently validated by NSC on 23rd January 2015. The proposed number of dwellings has since been reduced to up to 75, and the application is currently awaiting determination.

6.1.3 Gladman has provided extensive evidence to demonstrate that the site is suitably located, with good access to existing services and facilities. The site lies immediately to the north of Chestnut Drive and would comprise a well-contained small scale extension to the built up area of Claverham.

6.1.4 Gladman submit that the site should have been considered as a potential housing allocation to ensure that the CNP adequately provides for current and future housing need, as well as to support Claverham in meeting its vision and objectives for improved local infrastructure and facilities. The PPG specifically states that “a Neighbourhood Plan can allocate sites for development. A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria…” In this regard, there has been no attempt to appraise the sustainability merits of land north of Chestnut Drive in favour of proposed redevelopment at land north of Bishop’s Road. Gladman therefore submit this site for consideration as a potential housing allocation.

6.1.5 Gladman considers that the proposed development on land north of Chestnut Drive can bring real benefits to the local community, including:

- The delivery of market and affordable housing in a sustainable location to meet housing needs;

- The provision of new public open space that is not currently available and a high quality landscape setting, along with more informal recreation space and landscaping to meet the needs of existing and future residents.

- The creation of a high quality residential development which respects the character of the surrounding area.

- The delivery of this scheme will result in significant benefits for the local community and the surrounding area including the provision of New Homes Bonus payments, increasing the economic activity of the area and provide a number of aspirations that are currently being targeted by the CNP that are not currently being planned for.

*Paragraph 642 Reference ID: 41043-20140306
7 CONCLUSIONS

7.1.1 Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the CNP must be consistent with national planning policy and guidance and the adopted Development Plan for the wider area.

7.1.2 In order for the Plan to proceed and meet all of the Neighbourhood Plan Basic Conditions set out in Schedule 4b, the Parish Council must ensure that the policies contained in the CNP are consistent with the requirements set out above and allow for a sufficient degree of flexibility so that the Plan is able to react to changing market conditions.

7.1.3 In its current form the Plan provides no certainty that the redevelopment of the existing employment land is capable of coming forward, accordingly, the Parish Council should consider the allocation of alternative housing land for residential development and/or the allocation of housing reserve sites.

7.1.4 Gladman considers that a less restrictive approach is required to enable the Plan to progress to Regulation 15 and 16 of the Neighbourhood Planning (General) Regulations 2012. If the Plan is not amended to take account of these representations and the advice and guidance issued by the SoS then there is a real risk that it will be found inconsistent with the basic conditions at Examination and subsequently will be unable to progress to Referendum.
APPENDIX 1

Working with Yatton Parish Council to create Claverham Neighbourhood Plan
8 NPIERS Pre-Submission Health Check

The plan was reviewed under the NPIERS scheme and the following is a full transcript.

All of the matters contained herein were discussed with Celia Dring of North Somerset and modifications made to the plan. Claverham Future extends its thanks to Barbara Maksymiw for here diligent review.

Claverham Neighbourhood Plan

Health Check

September 2016

Barbara Maksymiw BSc MSc RTPI
Introduction

Claverham Future requested this health check through the Neighbourhood Planning Referral Service (NPIERS) in July 2016. This report is an independent, desk based review designed to identify the extent to which, in my opinion, the plan complies with the Basic Conditions and other legal requirements. My comments are advisory only and are intended to inform and assist the Steering Group in producing a robust Neighbourhood Plan as they move forward to the next stage.

I am a planning consultant and a neighbourhood plan examiner accredited by NPIERS. I do not have any interests in the neighbourhood plan area nor any connections with those preparing the plan and I am satisfied that I am independent.

In preparing this health check, I have:

- Read the documents supplied by the Chair of Claverham Future and North Somerset Council
- Familiarised myself with the strategic planning context, through reading the latest information available in the Planning Policy section of North Somerset Council’s website
- Spoken to the Chair of Claverham Future on 25 July 2016 to clarify various matters concerning the timing of the health check and other background information
- Sought clarification from North Somerset Council about SEA/HRA screening and the formal decision to designate the Neighbourhood Plan area

I carried out an initial assessment on the Pre Submission Consultation version of the plan in late July and subsequently was sent a revised version of the plan produced by the Steering Group on 8 August. This sought to address some of the issues which had been raised by consultees at the Pre Submission stage which ran between 20 June and 1 August 2016. I have also seen comments made on the plan by North Somerset Council officers dated dated 26 July and 5 August 2016. I concur with many of the detailed comments that the local authority officers have made and I have made the assumption in preparing this health check that the next version of the Neighbourhood Plan will take these comments on board. Wherever possible I have taken these into account, but there may be a small number of instances where suggestions in my report have already been addressed in the updated version.

This health check sets out my views and suggestions on the revised plan (fourth draft) dated 8 August. I am conscious that the Neighbourhood Plan is very much a piece of work that is in progress. Even in the short space of time that has elapsed since the consultation closed, I am pleased to see that a number of the concerns I had about the earlier version of the plan had already been addressed.

The Basic Conditions
If a Neighbourhood Plan is to “pass” an independent examination, then it must meet the Basic Conditions set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act. The Plan must:

a. having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood development plan,

b. the making of the neighbourhood development plan contributes to the achievement of sustainable development,

c. the making of the neighbourhood development plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),

d. the making of the neighbourhood development plan does not breach, and is otherwise compatible with, EU obligations, and prescribed conditions are met in relation to the neighbourhood development plan and

e. prescribed matters have been complied with in connection with the proposal for the neighbourhood development plan

Much of the information required to demonstrate that the plan meets the Basic Conditions is set out in the Draft Basic Conditions Statement (Third Draft) August 2016. I have commented below on how this might be expanded and improved.

Structure of the Health Check

The health check is set out in three parts, as follows:

• An overview of the neighbourhood plan and my overall findings and recommendations

• A summary of my recommendations

• The completed NPIERS health check template

Overview and overall findings

Overall the plan is well presented and constructive and focusses on the key issues affecting Claverham. Lying between Weston super Mare and Bristol, Claverham is very close to the neighbouring settlement of Yatton which has experienced much growth in recent years. The focus of the plan is on shaping the future of Claverham, based on the needs of local residents. It plans positively and is realistic about what might happen to the main employment site in the village.

The plan is well illustrated, with excellent mapping and it is clear from the supporting documents that the community has been involved in drawing up the plan. There is also extensive supporting material which shows that a wide range of research has been carried out to support the plan. The Steering Group are to be congratulated for all the hard work that has gone into preparing the draft plan over a relatively short time period.
I have a number of concerns about the extent to which the plan is ready for examination. I have set out below a number of areas where the plan needs to be improved and strengthened.

**Designation decision**

The decision to designate the Neighbourhood Plan area is an important part of the statutory process of preparing the plan so I suggest that the decision notice is added to the website. This should also be directly referred to in the Basic Conditions Statement and added as an Appendix to it. This will help to ensure that a future Neighbourhood Plan examiner has all the relevant documents in front of them when examining the plan.

Claverham is unusual in that two Neighbourhood Plans are being prepared under the aegis of one Parish Council. For this reason, a future examiner will be particularly interested in the views of Yatton Parish Council and the group preparing the parallel Yatton Neighbourhood Plan and will want to be satisfied that the two plans’ objectives and policies are compatible. Notes of meetings/discussions between the organisations and/or formal representations would be very helpful, if these are available. If there were any issues that had to be jointly addressed and resolved, then this should be explained in the Statement of Consultation.

**Basic Conditions Statement**

This is an important document and needs to be transparent about how the plan meets the Basic Conditions. I suggest it is thoroughly rechecked once the final wording for each plan policy is resolved. North Somerset Council has also advised how the Basic Conditions Statement should be amended to reflect the latest strategic planning policy position and this advice should be taken on board.

**SEA/HRA**

An SEA and HRA Screening Report for Claverham Neighbourhood Plan was produced by North Somerset Council in May 2016, which concluded that it was unlikely that the plan will have any significant environmental effects and that neither a full SEA or HRA was required. This conclusion is an important test to demonstrate that the plan meets the Basic Conditions and I suggest that the SEA/HRA Screening Report and the North Somerset Council Decision Notice are added to the NP website and much more directly referred to in the Basic Conditions Statement, ideally including it as an Appendix.

**Statement of Community Involvement**

It is clear from the supporting material that there has been a good level of community consultation during the course of preparing the plan and that it reflects community aspirations. The Neighbourhood Planning Regulations use the term Statement of Consultation for the summary of consultation on a Neighbourhood Plan, rather than
the term Statement of Community Involvement (SCI), so I suggest the title of Document 2 is changed. It would also be helpful if all of the material collected and referred to in the report was dated. Again, it is an evolving document and in due course a list of who was consulted at Pre Submission stage, a summary of the representations made and how they were dealt with will need to be added.

**Strategic planning context**

The North Somerset Local Plan policy context is complex and evolving so it is important that the NP meets the Basic Conditions in relation to general conformity with the strategic policies contained in the most up to date development plan. The assessment under the Basic Conditions is against the strategic policies which are in force at the time of the Neighbourhood plan examination so it is therefore good practice to coordinate emerging plans to ensure that their policies are aligned. The relative timing of the various North Somerset Plans will determine which plan the Neighbourhood Plan is assessed against.

Given that a decision is expected from the Inspector shortly on Policy CS33, which could impact on the approach to development in settlements such as Claverham, I would urge that the Steering Group works closely with North Somerset Council officers to ensure that the Neighbourhood Plan policies will be fully aligned with the adopted development plan. In the template below I have set out my more detailed recommendations on this.

I am aware from correspondence that I have seen that there is already a good working relationship with the Council and I feel confident that this positive approach will lead to a redrafted document which will reflect the strategic planning context and therefore meet the Basic Conditions.

**Policy wording**

The purpose of the policies in the Neighbourhood Plan is to help decision makers to make decisions on planning applications and so the policies must relate to land use planning matters and be expressed in a clear and unambiguous way. At the moment, quite a number of the policies fall short of this standard. Examples of wording or phrases which are imprecise and could be open to misinterpretation are “large scale development” (policy D1 and S1), “long term benefit “(Policy S1) and “where appropriate” (Policy T1).

It might be helpful for the Steering Group to run through the wording of each policy with an experienced policy planner or development management officer, to tighten the policy wording up and ensure that each policy provides sufficiently robust guidance for making decisions on planning applications.

**Supporting text to plan policies**

With the exception of several paragraphs which precede the transport policies, there is very little supporting text provided for the policies in the plan. In other cases, pieces of supporting text are mixed in with the policy wording so it is difficult to be
clear which text is policy wording and which is supporting text. This is a serious shortcoming as it means that neither those making comments on the plan nor a potential examiner can be clear about the justification for a particular policy nor what supporting evidence has been used. The lack of supporting justification also makes decision making on planning applications much more difficult.

Much of the relevant material is already available in the supporting appendices and I suggest that this is summarised and inserted into the plan next to the relevant plan policy. Two or three supporting paragraphs below each policy would be sufficient. A number of Neighbourhood Plans distinguish between policy wording and supporting text by using bold type for the policy and ordinary type for the supporting text and this simple device might be a possible solution.

Site Allocation

The plan recognises that the Claverham UTC site will shortly become surplus to requirements and allocates the site for a mixed use development. On the Proposals Map the site is shown as outside, but immediately adjacent, to the settlement boundary.

I recognise that the Steering Group wishes to provide a steer on future use of the site, particularly since it is likely to be declared surplus to requirements in the relatively near future. However, I have concerns about the policy approach suggested. As drafted I think it runs the risk of not being compliant with the strategic planning context and national guidance. Planning Practice Guidance says: "A neighbourhood plan can allocate additional sites to those in a Local Plan where this is supported by evidence to demonstrate need above that identified in the Local Plan" (Planning Practice Guidance Paragraph: 044 Reference ID: 41-044-20160519). It also says that “A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria.” (Planning Practice Guidance Paragraph: 042 Reference ID: 41-042-20140306)

If the site is identified as a land allocation, to comply with the Guidance there has to be supporting evidence and some assessment of reasonable alternatives as well as a clear explanation about why a particular site has been allocated. This would include the assessment of other potential housing sites in and adjacent to the village, including the site being promoted by other parties. As far as I am aware, no such assessment has been done.

The Framework says that “Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.” Following this principle, another option would be to amend the settlement boundary to include the site within the village without allocating it for a particular purpose. Redevelopment would be permissible provided the third paragraph of revised policy CS33 applied - namely “In the case of redevelopment proposals within settlement boundaries it must be demonstrated that if the site or premises was last used for an economic use, that continuation in economic use is unsuitable”.

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I therefore suggest that the Steering Group discuss alternative policy approaches to the UTC site and Policy D3 with NSC officers to ensure that the final version meets the Basic Conditions and conforms with the strategic planning context. As part of this review, the potential overlap between policy SB1, D1 and Policy D3 also needs to be addressed.

Proposed Local Green Space Designations

The designation of LGS2 replicates the designation of the site as local green space in the adopted Core Strategy. I am aware that there is a live Village Green application on the site, which has yet to be determined and all the supporting evidence for this is set out in Appendix 3A. If the Steering Group is relying on the Village Green evidence to support the LGS2 designation, it would be helpful if this was made clear in the supporting text to the policy.

Of greater concern is the proposed designation of May Day Field as LGS1. Local Green Space is a very restrictive and significant policy designation. The Framework requires the managing of development within Local Green Space to be consistent with policy for Green Belts. Effectively, Local Green Spaces, once designated, provide protection that is similar to that for land designated as Green Belt and rules out new development except in very special circumstances. The Framework is explicit in stating that: “The Local Green Space designation will not be appropriate for most green areas or open space.” (Para 77).

Taking this into account, it is essential that, when allocating Local Green Space, plan makers can demonstrate clearly that the requirements for its allocation are met in full. These requirements are that the green space is in reasonably close proximity to the community it serves; it is demonstrably special to a local community and holds a particular local significance; and it is local in character and is not an extensive tract of land.

Such designations therefore require substantial evidence to justify their status as Local Green Space. However, I have seen no such supporting evidence for LGS1 in the Appendices. If this evidence is available it should be published as a separate appendix and, if not, perhaps an alternative approach should be considered.

Summary of Recommendations

The findings of this Health Check review have led me to make a number of recommendations about matters which need to be addressed before the Neighbourhood Plan proceeds to the next stage. The recommendations I have made are done so in the spirit of being a “critical friend” and are intended to assist the Steering Group in refining the neighbourhood plan so that it can successfully go forward to the submission and examination stage. These are set out below.

Recommendation: The detailed reports relating to the designation of the Neighbourhood Plan should be added to the website and included in the Basic Conditions Statement
Recommendation: Rename SCI as Statement of Consultation to comply with Neighbourhood planning (General) Regulations 2012 Reg15. Add relevant appendices using a suitable referencing system. Ensure references to consultation responses are appropriately attributed.

Recommendation: Steering Group to prepare a Project Plan, in consultation with North Somerset Council, which reflects the likely timing of planning decisions relevant to the Claverham Neighbourhood Plan and Council committee cycles.

Recommendation: Publish the SEA Screening Report and Decision Notice as part of the Basic Conditions Statement and add it to the website.

Recommendation: Publish the HRA Screening Report and Decision Notice as part of the Basic Conditions Statement and add it to the website.

Recommendation: Redraft S1 and D3

Recommendation: Explain how the plan will contribute to achieving sustainable development in more detail.

Recommendation: Redraft policies to ensure clear land use planning guidance is provided, capable of unambiguous interpretation by decision makers. Add supporting text to justify each policy, cross referenced to evidence sources, where appropriate. Add a short section to the plan summarising the up to date strategic planning context and specifically set out the time period which the Neighbourhood Plan covers.

Recommendation: Redraft S1

Recommendation: Redraft D1

Recommendation: Redraft D2

Recommendation: Review D3 with NSC officers and redraft

Recommendation: Redraft or delete S1

Recommendation: Redraft DR1 in light of NSC officer advice

Recommendation: Add supporting text to T1

Recommendation: Redraft T2 to separate policy from supporting text

Recommendation: Review T3 in light of advice from N Somerset officers

Recommendation: Redraft PT1

Recommendation: Redraft EMP1
Recommendation: Redraft LS1 in light of NSC officer advice

Recommendation: Redraft CF1

Recommendation: Review CF2 and CF3 to ensure consistency with CF1

Recommendation: Delete CF3 or redraft D3

Recommendation: Redraft Y1 in light of NSC officer advice

Recommendation: Delete or redraft TE1

Recommendation: Redraft ENV1-3 in light of NSC officer advice

Recommendation: Present robust evidence in an appendix to support the proposed designation of the May Day Field as Local Green Space

Recommendation: Redraft R1 in light of NSC officer advice

Recommendation: Redraft CIL1

Heath Check Template

Part 1 – Process

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Response/Comments</th>
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<tbody>
<tr>
<td>1.1 Have the necessary statutory requirements been met in terms of the designation of the neighbourhood area?</td>
<td>Yes. The parish of Yatton was divided into two sections for the purpose of neighbourhood plan preparation with the agreement of residents of both Yatton and Claverham in January 2015. This principle was agreed by Yatton Parish Council and then by North Somerset Council. The Council’s website states that the neighbourhood plan areas were formally designated on 24 April 2015, although a copy of the formal decision notice is not available on the website. Recommendation: The detailed reports relating to the designation of the Neighbourhood Plan should be added to the website and included in the Basic Conditions Statement</td>
</tr>
<tr>
<td>1.2 If the area does not have a parish council, have the necessary statutory</td>
<td>The Neighbourhood Plan area is covered by Yatton Parish Council and the Claverham Future’s Steering Group was tasked by the Parish Council to prepare the NP. The Steering Group are all local residents working as volunteers for Yatton Parish Council</td>
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<td><strong>requirements been met in terms of the designation of the neighbourhood forum?</strong></td>
<td>A programme of consultation on the third draft of the Neighbourhood Plan was undertaken between 20 June and 1 August 2016 - this is referred to as consultation on the pre-examination version of the plan. The Steering Group has revised the plan in the light of representations received and it is this version (8 August) which is the subject of this Health Check. Further public consultation is planned on the Submission version of the plan.</td>
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<tr>
<td><strong>Has the plan been the subject of appropriate pre-submission consultation and publicity, as set out in the legislation, or is this underway?</strong></td>
<td>The programme of consultation undertaken is set out in the Statement of Community Involvement and appears to be proportionate to the scale and complexity of the plan. To comply with legislation this document should be referred to as the Statement of Consultation, rather than the SCI. For ease of reference, it would be helpful if all the appendices relating to consultation were appended to the consultation document rather than included in the larger NDP appendices. References are made on page 12 of the SCI to the “majority of residents/villagers” when in fact this should refer to the majority of respondents to the survey. This is an important distinction as responses were received from only about a quarter of the residents aged 16 or over. Other parts of the report would benefit from a similar tightening up to ensure that responses from the public are accurately recorded. The Landowner survey refers to “Conversations” but it is not clear where and how these were recorded. It should also be explained in the report how the consultation responses have, where appropriate, influenced the content of the plan.</td>
</tr>
<tr>
<td><strong>Are arrangements in place for an independent</strong></td>
<td><strong>Recommendation:</strong> Rename SCI as Statement of Consultation to comply with Neighbourhood planning (General) Regulations 2012 Reg15. Add relevant appendices using a suitable referencing system. Ensure references to consultation responses are appropriately attributed</td>
</tr>
<tr>
<td><strong>Not as far as I am aware</strong></td>
<td></td>
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<tr>
<td>Criteria</td>
<td>Response/Comments</td>
</tr>
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<tr>
<td>2.1 Are each of the plan policies clear?</td>
<td>No – but see 2.8 and 2.9 below. Although the majority of policies are expressed in land use terms, most require further fine tuning see 2.9 below. The separation of...</td>
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Part 2 – Content
<p>| | | |</p>
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<tr>
<td><strong>unambiguous and appropriately justified?</strong></td>
<td>supporting text out of some policies will also assist – see 2.8 below.</td>
<td></td>
</tr>
<tr>
<td><strong>2.2</strong></td>
<td><strong>Is it clear which parts of the draft plan form the ’neighbourhood plan proposal’ (i.e. the neighbourhood development plan) under the Localism Act, subject to the independent examination, and which parts do not form part of the ’plan proposal’, and would not be tested by the independent examination?</strong></td>
<td>It is evident that the Steering Group intends that all of the Neighbourhood Plan document should be subject to independent examination. The only part which reflects community aspirations is the Funding section at the end which deals with how income from CIL might be spent. Given that work on CIL in North Somerset is at an early stage of development, it might be wise to review this section in the light of the latest position on CIL when the plan is updated, before proceeding to the independent examination.</td>
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</tbody>
</table>
| **2.3** | **Are there any obvious conflicts with the NPPF?** | Policy S1 seems to go further than the NPPF in terms of what is required for a large scale development to be sustainable – for example requiring development to bring long term benefits. It therefore runs the risk of not being aligned with the NPPF. There are also concerns about the approach to the site allocated under policy D3 which appears out of line with the Framework and guidance in Planning Practice Guidance. See my general comments above  

**Recommendation: Redraft S1 and D3** |
| **2.4** | **Is there a clear explanation of the ways the plan contributes to the achievement of sustainable development?** | The Basic Conditions Statement (page18) provides a very short statement which does not provide sufficient explanation about how the NP meets the Basic Conditions. It may be worth looking at other Neighbourhood Plans which have passed examination to see how they have tackled this – local examples would be Backwell and Long Ashton Neighbourhood Plans  

**Recommendation: Explain how the plan will contribute to achieving sustainable development in more detail** |
<p>| <strong>2.5</strong> | <strong>Are there any</strong> | No – this is confirmed in Section 7 of the Basic Conditions |</p>
<table>
<thead>
<tr>
<th>Issue</th>
<th>Statement</th>
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<td>2.6 Does the plan avoid dealing with excluded development including nationally significant infrastructure, waste and minerals?</td>
<td>Yes – this is stated on Page 10 of the Basic Conditions Statement</td>
</tr>
<tr>
<td>2.7 Is there consensus between the local planning authority and the qualifying body over whether the plan meets the basic conditions including conformity with strategic development plan policy and, if not, what are the areas of disagreement?</td>
<td>It is pleasing to see that the Steering Group and the local planning authority are working together to ensure the emerging Neighbourhood plan conforms with the strategic planning context. This is a particularly challenging task at the moment given the complexity of the current Core Strategy and Local Plan situation in North Somerset. The areas of disagreement and my suggested recommendations are set out in Section 2.9 below and in my overall summary above.</td>
</tr>
<tr>
<td>2.8 Are there any obvious errors in the plan or other matters that require consideration?</td>
<td>A number of the policies are not expressed clearly enough to provide unambiguous guidance for the decision-maker. For the most part, there is no supporting text to explain the policies – these are significant issues which need to be addressed. The North Somerset Local Plan policy context is complex and should be more fully summarised in the plan itself, rather than solely in the Basic Conditions Statement. In particular, the period which the Neighbourhood Plan covers should be explicitly stated. Adding a short context chapter between chapters 2 and 3 would be a possible approach. Recommendation: Redraft policies to ensure clear land use planning guidance is provided, capable of unambiguous</td>
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</table>
interpretation by decision makers. Add supporting text to justify each policy, cross referenced to evidence sources, where appropriate. Add a short section to the plan summarising the up to date strategic planning context and specifically set out the time period which the Neighbourhood Plan covers.

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<th>2.9</th>
<th>Are the plan’s policies clear and unambiguous and do they reflect the community’s aspirations?</th>
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<td></td>
<td>As explained above, the policies need to be expressed more precisely in land use planning terms to ensure that they provide sufficient, unambiguous guidance for decision makers. Comments on each policy are set out below.</td>
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<td>SB1 This policy mixes policy wording and supporting text. If the settlement boundary is amended to include the UTC site, then this policy would need to be updated. It also needs to align with the final version of NS policy CS33 which defines what forms of development will be acceptable within the settlement boundary. <strong>Recommendation: Redraft SB1</strong></td>
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<td>D1 This policy overlaps with D3 which deals with the UTC site. Suggest that policy D1 focusses only on the settlement boundary and infill development which would be acceptable within it. Any potential overlap with the redrafted SB1 (see above) would need to be resolved. <strong>Recommendation: Redraft D1</strong></td>
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<td>D2 The Housing Character heading and the five bullet points below it should be in supporting text rather than policy. <strong>Recommendation: Redraft D2</strong></td>
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<td>D3 Parts of clause 1 and 2 are supporting text and should be separated out from the policy. See also general comments on the approach to the land identified under policy D3 above and how it is aligned with the the strategic policies of the North Somerset Core Strategy. <strong>Recommendation: Review D3 with NSC officers and redraft</strong></td>
</tr>
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<td></td>
<td>S1 This policy seems to go beyond the requirements of the NPPF. Suggest amendment or deletion. <strong>Recommendation: Redraft or delete S1</strong></td>
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<td>DR1 I note that NSC officers have suggested further changes. I support this. <strong>Recommendation: Redraft DR1 in light of NSC officer advice</strong></td>
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<td>T1 Supporting text is required to justify the locations identified for these traffic management measures. <strong>Recommendation: Add supporting text to T1</strong></td>
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| **T2** | The second sentence of the first paragraph is land use policy and the remainder of T2 is all supporting text. Suggest policy is redrafted to make a clear distinction between the policy and supporting text.  
**Recommendation:** Redraft T2 to separate policy from supporting text. |
| **T3** | The requirement for no on street parking in any new development seems rather onerous and would need robust evidence to support it. I suggest N Somerset highways officers views are sought on this policy wording.  
**Recommendation:** Review T3 in light of advice from N Somerset officers. |
| **PT1** | The first sentence is supporting text and should be separate from the policy wording. If the intention is that new development, perhaps over a certain scale, should include bike stands then the policy needs to be drafted to express this clearly and in land use planning terms.  
**Recommendation:** Redraft PT1. |
| **EMP1** | While the aim of the policy aligns with the NPPF, the “other uses” need to be more closely defined.  
**Recommendation:** Redraft EMP1. |
| **LS1** | I note that NSC officers have highlighted that this policy needs to align with the relevant NS CS policies and have offered to provide advice. I agree this would be beneficial.  
**Recommendation:** Redraft LS1 in light of NSC officer advice. |
| **CF1** | The term “protected” is rather vague and would be better expressed in more specific terms.  
**Recommendation:** Redraft CF1. |
| **CF2 and CF3** | This policy uses the term “retained” to apply to the Broadcroft Playing Area and the Claverham Meeting House rather than the word “protected” which applies to the Village Hall and Car Park. Is there a material difference in how decisions would be made on each site?  
**Recommendation:** Review CF2 and CF3 to ensure consistency with CF1. |
| **CF3** | The reference to a medical facility on the D3 site duplicates the last bullet of clause 5 of policy D3. Suggest deletion or redrafting D3  
**Recommendation:** Delete CF3 or redraft D3. |
| **Y1** | As drafted there is no land use dimension to this policy. Suggest liaising with NSC officers to redraft to incorporate the |
elements of CS policy DM69 which would be relevant to Claverham.
Recommendation: Redraft Y1 in light of NSC officer advice

TE1 This does not seem to be a land use planning policy, rather it is a community aspiration. Suggest redrafting or deleting.
Recommendation: Delete or redraft TE1

ENV1-3 I note that NSC officers have highlighted that these policies needs to align with the relevant North Somerset Core Strategy policies and have offered to provide advice. I agree this would be beneficial
Recommendation: Redraft ENV1-3 in light of NSC officer advice

ENV4 I have noted above my concerns about the lack of supporting evidence to support the designation of the May Day Field as Local Green Space. Without this evidence, the policy and the designation will not comply with the framework. It is important that this is addressed before the plan proceeds to the next stage.
Recommendation: Present robust evidence in an appendix to support the proposed designation of the May Day Field as Local Green Space

R1 I note that NSC officers have suggested further changes. I support this.
Recommendation: Redraft R1 in light of NSC officer advice

CIL1 As CIL is not yet in place in North Somerset, this policy seems premature. Once CIL is in place, local priorities for spending might be better expressed as supporting text rather than land use policy. I note that NSC officers have also suggested further changes and I suggest these are taken on board.
Recommendation: Redraft CIL1