

# North Somerset Local Plan (regulation 19 ) Consultation Sites Document

## Response from the Long Ashton Parish Council

<b>Summary</b>	<b>2</b>
Default position	2
Our position on the Woodspring site	3
Our position on the Long Ashton sites	3
Community response post EPIC	4
<b>Key expectations for all site development</b>	<b>4</b>
Relevant policies	4
Social infrastructure	6
Transport infrastructure	6
Greenbelt	6
<b>Our position on SW Bristol sites</b>	<b>7</b>
Woodspring golf course area	7
Reservoirs	7
Community services	7
Landscape & ecology	7
Site between Yanley Lane and the Link Road	8
North of Link Road slope	9
<b>Our position on Long Ashton sites</b>	<b>9</b>
Site HE208037 - Land north of Short Lane, Long Ashton	9
Long Ashton Parish Council objects extremely strongly to this potential site allocation.	
Residential Capacity: 97	9
Site HE203026 - Land off Clarken Coombe	10
Site HE2018 - Land south of Parsonage Road	11
Site HE20288 - Land south of Parsonage Road	11
Site HE2021 - Land around Yanley Lane, South Long Ashton	12
Site HE20139 - Land south of Long Ashton	13
Site HE20276 - Land west of Wild Country Lane	14
Site HE2043 - Weston Rd Long Ashton	14
Site HE20277 - Land south of Weston Road	15
<b>Alternative sites</b>	<b>15</b>
<b>Conclusion</b>	<b>16</b>
<b>Liaison &amp; dialogue</b>	<b>16</b>
<b>Appendix A - full resident response site HE208037 - Land north of Short Lane,</b>	

<b>Long Ashton</b>	<b>17</b>
Executive Summary	17
Site HE208037 description	20
Access	21
Ecology	22
Geology	25
Capacity	26
Long Ashton Neighbourhood Development Plan policies	29
ENV1 Area of Separation	29
ENV2 Protection of trees and woodland	30
ENV3 Maintain and enhance public rights of way	31
ENV5 Conserve and enhance areas of value to nature or landscape	32
ENV6 Protect against flooding	33
National Planning Policy Framework	36
Non-compliance with North Somerset Local Plan 2040 Policies	37
Non-compliance with North Somerset Plan 2040 Pre-submission Sustainability Appraisal objectives	39
<b>Appendix B - specific answers from Officers to questions generated by LAPC prior to responding to this consultation</b>	<b>40</b>
1. Transport Infrastructure	40
2. Climate change & Biodiversity Loss 2040	40
3. Green Belt concerns	43
4. Sustainability, affordable housing & other infrastructure challenges:	44
5. Specific questions on the 'most suitable' site HE 20110	44

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## Summary

### Default position

Our default position adheres to the current Long Ashton Parish Council Neighbourhood Development Plan (2015). In this case, we do not support the proposals for additional sites for development in the Green Belt around Long Ashton. This includes sites such as the Woodspring Golf Club, those around the former Barrow Hospital site and others that, as NSC's own Green Belt Review (2021) acknowledges, directly contribute to purposes 1, 2, 3 & 5 of the Green Belt.

## Our position on the Woodspring site

**However, recognising the changing political context and the difficult position North Somerset Council is in, should sites be allocated in the Green Belt, this should be done in a way that preserves Long Ashton as a separate settlement with a clear rural identity and with minimal impact on its existing infrastructure (schools, doctors surgeries, highways capacity and much more). This may mean a separate settlement with its own infrastructure is preferable to enlarging the village that will put more direct strain on village infrastructure.**

In the event sites are allocated for development, careful consideration must be given to the impact on the remaining Green Belt within the plan area. Current Government guidance states that *“authorities should consider whether, or the extent to which, the release or development of Green Belt land would affect the ability of all the remaining Green Belt across the area of the plan to serve all five of the Green Belt purposes in a meaningful way.”*

We believe that maintaining a significant strategic gap between Long Ashton and the proposed strategic development site—particularly by keeping development on the far side of the Yanley ridge and below this ridgeline—is essential. It is equally important to preserve a strategic buffer between the development and Bristol as well as Barrow Woods.

This approach would help ensure the Green Belt continues to serve its core purposes and align with the new Golden Rules set out in the National Planning Policy Framework.

In particular, it would support compliance with paragraph 156(c), which calls for the provision of “good quality green spaces,” and paragraph 159, which seeks to “support nature recovery.”

## Our position on the Long Ashton sites

With reference to the orange sites highlighted on the maps as ‘other potential’, Long Ashton Parish Council believes that (a) the village is big enough and (b) the cumulative impact on village character and existing infrastructure would be overwhelmed if any of these sites were allocated. In stating this, we have taken into account the impact of the EPIC campus, Longmoor Village development, Cumberland Basin development and the potential impact of development on the village & surrounding area from development on Woodspring Golf Course & Dundry slopes.

Some of these orange sites also have specific challenges, such as the University of Bristol land which is separated from the village via a railway bridge, and the land near Short Lane, which is constrained and very hard to access (see further information included in this document & Appendix B)

**Consequently our view is that emphasis and focus should be on a new strategic site is preferable to any of the proposed sites in and around Long Ashton.**

## Community response post EPIC

An important point of context is the recent decision by NSC to approve the building of EPIC's European HQ in Long Ashton. This means the village has already lost one of the most sensitive green belt sites in the parish.

## Key expectations for all site development

Long Ashton Parish Council and local residents are well aware that there is a need for housing. The question remains where, of what type and with what infrastructure (green and social). The consensus is that the majority of people believe in the core principle of the 'right houses in the right places'. Therefore, this section sets out to scrutinise some of the core principles underlying any development.

## Relevant policies

First, it is worth reminding councillors and officers of North Somerset Council's overall vision set out within their Corporate Plan (2020-4) for an '**open, fairer, greener North Somerset**' with "**three priorities**

- **to create a thriving and sustainable place**
- **a council that empowers and cares about people**
- **an open and enabling organisation"**

And a promise that by 2030, '**our green infrastructure will**

- **contribute to a carbon neutral community**
- **biodiversity will have measurably increased**
- **health and wellbeing will be improved"**

This will be achieved '**by engaging and empowering the local community and local groups to be active partners in the delivery of the Action Plan.**"

With these core principles in mind, Long Ashton Parish Council hopes this document will, indeed, "**engage and empower our local community and local groups to be active partners in delivery of the Action Plan**". By doing so, it may restore our trust in the local democratic process though the experience of the EPIC consultation process has demoralised many residents.

At a strategic and futures oriented level, (the Revised Local Plan will cover the period from 2025 to 2040), it is clear such a plan should guide the whole area and its

communities so that by the end of the plan period in 2040, North Somerset will be well advanced in meeting the statutory requirements from national, international government and the UN in relation to the climate and biodiversity crises and other strategic objectives.

As NSC's Green Infrastructure Strategy (NSC GIS) document states, we want any new development to maximise the multiple benefits of Green Infrastructure delivering resilient, healthy and environmentally friendly places with a net gain in natural capital and ecosystem services by investing in Green Infrastructure for the long term.

Key strategic objectives include:

- resilience to climate change, including water retention in both the low land and uplands by restoring our water courses and a natural environment that increases cooling of the semi-urban/urban areas
- contributing to a low carbon future including an increase in local, high quality, sustainable food production
- strategic accessibility and mobility in relation to transport,
- improvements that counter the loss of biodiversity and enhance nature,
- reductions in air and water pollution,
- improving the life chances for all parts of the community in relation to access to housing, the associated social infrastructure and access to high quality green and blue space.
- Where development is to be allocated in the Revised Local Plan, we need strategic design briefs for all sites to ***'improve local sense of place, protects and enhance landscape character and the natural, cultural and heritage services they provide'*** (NSC GIS).

To achieve these strategic objectives outlined in the Green Infrastructure Strategy and our local community's needs, it is clear that a shift in thinking, policies and action is needed to a more regenerative paradigm to ensure development and change not only meet their own objectives but also contribute strongly to the strategic objectives set out above.

It is not clear from the proposals contained in this consultation that the Local Plan will deliver any of the strategic objectives outlined above and are necessary to position the community and their environments for the future. **As a result, we attach the Officers' response to our concerns within the Appendix.**

As previously mentioned, the cumulative impact of both EPIC and the Woodspring development will fundamentally change the parish forever so the community demands a key role through a Working Group or Placemaking Panel in how any sites in the Long Ashton area that may be allocated will be developed – e.g. the quality of the development, the masterplan, % affordable & % green space/nature recovery areas.

## Social infrastructure

If 7,000+ houses are built in this area (as proposed with the most suitable and other potential sites in the consultation document) this will result in a minimum of 16,520 extra people (based on the Office for National Statistics of 2.36 residents per household) living here. Although schools and doctors surgeries are mentioned what about a new hospital? And where will the staff come from? Will we be expected to travel to Weston, Southmead or the BRI? And with cemeteries and burial grounds full, where will people be buried? We appreciate that these will be expanded upon in the next phase, but if we accept these housing numbers have to be met then this remains a key concern for us.

## Transport infrastructure

There will be an extra 8,400 cars on the roads (based on National Travel Survey 2022 data of 12 cars for every 10 households) plus associated delivery vans and taxis so how will the existing road network cope?

All those who use the A38, the A370, Cumberland Basin, Colliters Way, Bedminster Down and the A369 know the volume of traffic is beyond capacity already. With the approval to build Longmoor Village on the South Bristol/North Somerset boundary, the EPIC campus and the current and potential expansion of Bristol Airport, we face total gridlock. Traffic already spills onto the narrow lanes within Long Ashton and further afield making life difficult/dangerous for many residents and other active transport users.

**Therefore we urgently demand an integrated transport and infrastructure plan particularly in relation to the larger potential sites. As a result of residents' concerns, we attach the Officers' response to our query in the Appendix for future reference**

We have been told that these will be developer-led developments but, as shown by the objectives above, we urge NSDC to adopt a much more environmentally friendly approach to the housing crisis by creating communities not dormitory-towns.

## Greenbelt

It is also important to point out that we are strongly supportive of retaining as much of the Green Belt as is possible. We understand the demands on local authorities in relation to the building of housing and related infrastructure that comes from recent central government policy and may result in losing more high quality Green Belt Sites.

However, despite any developments that may be imposed on us, we would like any land put aside for Biodiversity Net Gain to be kept as high quality Green Belt. In that way, we hope the objective of improved and better- connected ecological networks to protect, enhance and expand coherent, thriving and resilient ecological networks that delivery

net gains in biodiversity and ecosystem services including the creation of bigger, better, more and joined up woodland, grassland and wetland habitats to achieve the ambitions of the West of England Nature Recovery Network” (NSC GIS 2021) is maintained for the long-term health of our environment – and ourselves.

## Our position on SW Bristol sites

This area (coloured yellow) in the Local Plan signifies the ‘most suitable’ site for residential allocation in this area and broadly we agree though with significant concerns mentioned below. And, for the site to be developed sympathetically, the numbers need to be reduced to 2,500-3,000. Bearing in mind the different characteristics of this large site, we’ve divided it into specific areas.

### Woodspring golf course area

#### Reservoirs

The Flood Risk from failure of the Barrow Tanks must be taken into account. The reservoirs, like many others, have earth embankments so the safety of the site relies on frequent monitoring and management. Without this, catastrophic failure of the structure, with uncontrolled release of all the water in a reservoir can eventually occur. This failure will lead to rapid inundation and poses a threat to the communities downstream of the structure (eg Long Ashton). Safety assessments for reservoirs such as these include how it performs in extreme weather conditions ie high rainfall and sustained winds. It is worth noting that incidents such as these are increasing due to the adverse impacts of climate change.

#### Community services

The current golf centre site location could be considered as the location of a local centre for this new ‘village’ with appropriate services, a public transport hub and higher density housing.

#### Landscape & ecology

It’s important to note that many under- used golf courses across the country are in the progress of being ‘rewilded’ and that Ethos Environmental Planning Ltd (commissioned by NSC to produce the GIS 2021) states that ‘ecological richness is not limited to only designated sites but is present throughout the district’. With many red-listed birds and UK BAP Priority Bird species feeding or breeding on the site (eg linnets, marsh tits, bullfinches), it provides a haven for migrant species such as lesser whitethroat and whitethroat as well as UK BAP Priority Mammal species such as otter and many species of bats. However, since it’s been a private golf course for decades, many Long Ashton residents haven’t had the chance to enjoy its special characteristics.

This large site is a significant greenbelt area. The rolling landscape and views to the Bath skyline and surrounding area from the ridgeline are some of the most attractive in the parish. The site is also rich in species and habitats. It contains the headwaters of Colliter's Brook and has large areas of mature tree belts and thorny thickets that host a variety of species in high numbers. The ridge that runs from Barrow Gurney to Aston Court and then on to Clifton is a major highway for wildlife including birds, bats and mammals.

So if this site is to be developed for housing, it would need a specific planning document which not only specifies the types of housing and the percentage of affordable homes but also places development constraints in relation to significant protected areas. The Long Ashton Parish Council should be involved, along with Dundry Parish Council in the creation of this document.

Nature recovery principles should be at the heart of any development with the retention of high quality greenbelt along and down from the ridgeline. The edge should be scalloped – approx. 30-40 metres from the top of the ridgeline - to ensure it sits comfortably within the rolling landscape and provides an enhanced and viable wildlife corridor. Natural woodland and scrub areas with existing wildlife value should be retained. Restoration of Colliter's Brook could be an ideal project to embrace in order to reduce the risk of flooding, reduce pollution and increase biodiversity.

Overall, the development brief should cover how best to manage the vehicular access and site circulation and how, in terms of massing and architectural form, the development would sit in the landscape on the sloping site, below the ridge due to the retained green belt allocation. These design principles in relation to nature, gradient, landscape, would also equally apply to the development sites on the Dundry slopes.

## Site between Yanley Lane and the Link Road

This is another large site although somewhat flatter than the Golf Course site. Again, on this site there are a significant number of areas where natural constraints exist and where there are overlays where development is difficult or should not take place as they are linked to when the new link road was constructed. The main issue on this site is how best to create the access to the site and the site circulation and how the new generation of vehicles related to the major road network will actually operate given that it is already gridlocked with current traffic levels. Colliter's Brook runs adjacent to this site – currently contained in a pipe underground – so see comments regarding brook above. (See separate comments re strategic transport network capacity above).



## North of Link Road slope

Bristol City Council has identified this site identified as a major nature recovery area and although it could be used for housing, the access is difficult and the site is very affected by the link road impacts of air and noise pollution.

There is a pressing need for more land to be available for burials in Bristol and North Somerset and it occurs to us that this site could be used with appropriate landscaping for this purpose.

## Dundry slopes

These sites on the lower slopes below Dundry could be positive for housing allocation however as in the discussion of the Woodspring Golf Course site it is a very sensitive site and needs very sophisticated design to be successfully integrated within the character of the Dundry slopes.

A Design brief is needed to ensure that the design parameters needed for the sites are adhered to along with the appointment of experienced architects and landscape architects who have experience of successfully integrating housing within such a sensitive and very observable setting. Again, with other proposals outlined above, there is a chance to weave in appropriate high quality, local food production within this site.

## Our position on Long Ashton sites

To reiterate our position with reference to the orange sites highlighted on the maps as 'other potential', Long Ashton Parish Council believes that (a) the village is big enough and (b) the cumulative impact on village character and existing infrastructure would be overwhelmed if any of these sites were allocated. In stating this, we have taken into account the impact of the EPIC campus, Longmoor Village development, Cumberland Basin development and the potential impact of development on the village & surrounding area from development on Woodspring Golf Course & Dundry slopes

## Site HE208037 - Land north of Short Lane, Long Ashton

Long Ashton Parish Council objects extremely strongly to this potential site allocation.

Residential Capacity: 97

<b>Access</b>	The only viable access is onto Short Lane that doesn't the capacity or the width to allow for movement of heavy machinery and the LGV movements
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	<p>required to build out a site of this size, especially given the slope angle. There is nowhere to build a site compound when accessing from the road since it immediately slopes upwards.</p>
<b>Land quality</b>	<p>A steep slope mainly covered by mature woodland. The steep slope reduces the capacity of the site due to the need for regrading and deeper footings.</p>
<b>Ecology</b>	<p>This site is part of the National Forest inventory and registered on the Priority Habitat inventory. It is identified on the Local Nature Recovery Strategy for woodland habitat - the highest strategic significance when calculating BNG on the site. It is also a Local Wildlife Site designated at the county level for its importance for wildlife.</p> <p>As a Local Wildlife Site, developing it goes against Policy DP35 of the Local Plan 2040 pre- submission plan. This policy is very clear that unless it can be appropriately mitigated, there should be no significant adverse effects on Local Wildlife Sites, Priority Habitat and that provision should be made to retain native woodland and veteran trees (both extensively present on the site).</p> <p>Since the site is also Priority Habitat that contains veteran trees, there is also irreplaceable habitat on site. This makes compliance with Policy DP36 difficult. The development of the site is further hindered by Policy DP37, which sets out the requirement to protect and retain canopy cover, and which also provides tree replacement numbers required.</p> <p><b>Please see Appendix B for valid and serious concerns outlined in full by the residents living in close proximity to this proposed site. All of which LAPC agree with in full.</b></p>

## Site HE203026 - Land off Clarken Coombe

Long Ashton Parish Council objects strongly to this potential site allocation.

Residential Capacity: 15

<b>Access</b>	<p>This site seems to only have access straight on to Clarken Coombe that we think will be unacceptable to the Highway Authority as the road already has heavy traffic with more expected due to the Longmoor Village and EPIC developments. It is very close to the junction with Weston Road and pedestrian/cycle/horse access to Ashton Court is already very dangerous.</p>
<b>Ecology</b>	<p>In addition, Bristol City Council has identified this site, due to its position, for nature recovery and not development. We agree that this site is unacceptable bearing in mind it sits within the heart of the Conservation</p>

	Area with this end of the village and is adjacent to Ashton Court and other sensitive sites. This site is not recommended for residential allocation in the Local Plan.
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## Site HE2018 - Land south of Parsonage Road

Long Ashton Parish Council objects strongly to this potential site allocation.

Residential Capacity: 219

<b>Access</b>	Access is tricky with less than suitable access points available.
<b>Ecology</b>	<p>It would be important to leave the land between the farmyard, the cycle track and Parsonage Road as high quality greenbelt with an emphasis on a combination of increasing biodiversity and local food production eg: establishing a combination of a syntropic forest (replicating the natural cycle of a forest but at greater speed) and wild flower meadows that, with the Church and burial ground, would create a 'green heart' at the far eastern end of the village and essential wildlife corridor.</p> <p>As a very sensitive site, it is at the heart of the conservation area. It would, therefore, require a development brief from the Council and the owners of the site taking advice on the appointment of specialist architects to design a masterplan and housing appropriate for this sensitive site in the heart of the conservation area.</p>
<b>Heritage</b>	This site includes the Listed Georgian Farmhouse and the Listed stone barn on the farmyard site

## Site HE20288 - Land south of Parsonage Road

Long Ashton Parish Council objects strongly to this potential site allocation.

Residential Capacity: 50

<b>Access</b>	Access is problematic. There could be vehicular access from Parsonage Close but not so easily from Yanley Lane given the closeness to the junction with Glebe Road and the closeness to the cycle track/pedestrian footpath and opposite the primary school.
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	Traffic going up the single track Yanley Lane to the A38 is already a problem without exacerbating it with extra local journeys.
<b>Drainage</b>	Local knowledge says this site is very wet and liable to flooding and may not be suitable for residential development, indeed any development. When contractors were engaged in constructing the cycle path, NSC refused to locate the site here because of the wet ground and the risk of flooding.
<b>Ecology</b>	It is also designated a Nature Recovery area by Bristol City Council. Our conclusion is that it's not suitable for housing and could provide a natural wetland area to mitigate the adverse impacts of climate change and biodiversity loss complementing the suggestion above (ref HE 2018)

## Site HE2021 - Land around Yanley Lane, South Long Ashton

Long Ashton Parish Council objects strongly to these potential site allocations  
Residential Capacity: 280

These are two sites either side of Yanley Lane: the site to the east adjoins the cricket pitch/football pitch and the land being developed by EPIC. It also contains some existing housing and associated barns, community chicken coops and is bounded by the railway, Yanley Lane and the EPIC development.

East

<b>Access</b>	Difficult vehicular access with probably the best access via the EPIC development if they would agree this. The access to Yanley Lane is potentially possible but is very near a primary school and would mean considerable growth in traffic on Glebe Road, a residential street with potential grid lock as cars try to get out into Weston Road in the rush hour traffic conditions.
<b>Drainage</b>	In terms of residential possibilities, the main problems are around the wetness of the land.
<b>Ecology</b>	This site has undergone a community Nature Recovery Programme with funds allocated by North Somerset Council and administered by the Lance Trust plus an army of volunteers. It is also designated a Nature Recovery area by Bristol City Council.

Our conclusion is that this site should not be allocated for housing but, with landowners' approval, could also play its part in high quality local food production

and nature recovery (eg establishing a heritage orchard with associated wild flower meadow and wetland)

West

<b>Access</b>	The vehicular access is difficult and would probably be via Yanley Lane. This then gives rise to the same problems as the site above with the location of the primary school, the residential Glebe Road and how to get out to Weston Road in the rush hour. Traffic going up the single track Yanley Lane to the A38 is already a problem without exacerbating it with extra local journeys.
<b>Land quality</b>	The site to the west of Yanley Lane is much larger but has the high level A370 on stilts over part of the site and is also bounded again at high level by the railway embankment. There are very loud noise levels from the trains and the high-level road A370. It is not a great site for housing.
<b>Ecology</b>	The Great Hedge Creation Project (referred to in previous site) also runs up the boundary with the railway track embankment to link the two semi-ancient/ancient woodlands of Hanging Hill & Dawson Walk and, on a bigger scale, linking the SSSIs of Avon Gorge & Ashton Court with Goblin Combe & Brockley Hall Stables. With landowner approval, the site is perfect for a larger nature recovery network including species-rich wildflower meadows.
<b>Heritage</b>	This site includes the community allotments that, with more residents, could expand and has, by default, become the main 'village green' for the village. Many people access this high quality green space every day.

Our conclusion is that this site should also not be allocated for housing and with the focus on a larger-scale nature recovery programme.

## Site HE20139 - Land south of Long Ashton

Long Ashton Parish Council objects strongly to this potential site allocation and believes, with the history of Long Ashton Research Station, that it could be transformed into high quality, sustainable, local food production with an emphasis on nature recovery.

Residential Capacity: 2000

<b>Access</b>	There may be a need for a widened bridge over the railway. There will be bottle necks getting on to Weston Road in the rush hour unless this site was
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	considered for an innovative no car or low car development site. There will also be a need for clear pedestrian and cycle routes to the village from this site.
<b>Ecology</b>	Ten years ago or more, a mix of student and resident volunteers planted a species-rich woodland on part of the slope whilst the LANCE Trust has worked alongside the farm manager to create a conservation headland of species-rich grassland using a combination of grant funding and local volunteer help. In addition, there is already significant wildlife habitat in a rich mix of semi-ancient woodland, water courses and scrub with these creating a second, invaluable wildlife corridor on the lower slopes.
<b>Heritage</b>	There are very significant natural settings that need to be maintained and enhanced. The network of public footpaths in and around this site is already well used and highly valued. These could be enhanced to provide more accessible, high quality green & blue space in parallel with the creation and enhancement of important wildlife corridors.

## Site HE20276 - Land west of Wild Country Lane

Long Ashton Parish Council objects strongly to this potential site allocation and comments with reference access to Site HE 20139 remain the same.

Residential Capacity: 174

<b>Access</b>	There may be a need for a widened bridge over the railway. There will be bottle necks getting on to Weston Road in the rush hour unless this site was considered for an innovative no car or low car development site. There will also be a need for clear pedestrian and cycle routes to the village from this site.
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## Site HE2043 - Weston Rd Long Ashton

Residential Capacity: 40

Long Ashton Parish Council objects to this potential site allocation. However, it also recognises that this site is at the end of the village and is currently used by

the railway for their site depot for their major reinforcing of the railway cutting embankments works.

As a result, Network Rail has levelled the land and covered it in hard core. To return it to agricultural land will be expensive and it's a relatively small site. Therefore, perhaps this site and the one below have some potential for housing at reduced numbers and using similar criteria to our suggestions for any development at Woodspring. However, this site is at some distance from the main facilities in the village which may or may not be significant

## Site HE20277 - Land south of Weston Road

Residential Capacity: 20

See above – same considerations.

## Alternative sites

As part of the community consultation into the new Local Plan, we have also been asked to consider alternative sites and ways of addressing the housing crisis. History shows that developers consistently 'lose' affordable housing on their developments so, from the start, we are sceptical that developers will keep to their promises of building 40% affordable housing. So what 'unbreakable' reassurance will be given that this will not happen again?

For a start, we encourage NSDC to adopt a more progressive housing policy around Weston Super Mare where much of the inner ring of land inside the recent large, car dependent housing developments and much of the city centre itself still feels hollowed out and would benefit from more progressive development – building up rather than building out, regenerating much brownfield and grey belt land in the area where there is genuine employment need and where employment policy is focussed, according to the Council's own policies.

We also encourage NSDC to work closely with other authorities in the WECA and look particularly at Bristol to regenerate its inner city to take some of the burden of housing numbers that North Somerset cannot accommodate without destroying its unique character.

And we encourage NSDC to work with the cash strapped housing associations in the area that have numerous unoccupied dwellings, particularly in Long Ashton for example, in order to refurbish existing housing and address a genuine need.

# Conclusion

Many people in Long Ashton, South Bristol, Dundry and other parishes will be profoundly affected by the potential developments contained within NSC's revised Local Plan. The recent drop-in consultation, NSC's handling of the EPIC application and previous developments plus lack of contact with our MP do not allay our fears.

However, we hope this document goes some way to establishing constructive dialogue, real collaboration and effective liaison between local people and NSC.

We acknowledge that, given the housing numbers allocated to North Somerset by the Government, our parish will be expected to accommodate a significant number of new homes. Our primary concerns remain to preserve the village's identity, to minimise the impact of any development on local infrastructure and to work towards the challenges posed by the adverse impacts of climate change and biodiversity loss.

We are particularly concerned about the cumulative impact of developing both the strategic site identified in the consultation and the additional sites located within or directly connected to Long Ashton. Taken together, we believe this scale of development would not only undermine our local objectives, but also cause significant harm to the Green Belt and run contrary to Government guidance on its protection.

**However, if a choice must be made, our preference would be for a new strategic development beyond the Yanley ridge, rather than further expansion of Long Ashton through the sites identified in the consultation.**

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# Liaison & dialogue

Going forward we ask that:

- 1) We are involved and consulted in how the sites that are allocated are developed - this may be through working groups or otherwise
  - a) This includes development of key planning documents related to the development i.e. masterplan, supplementary planning document regarding Woodspring, design of buildings etc.
- 2) We are given regular updates on progress - this may be through formal updates or a specific stakeholder with whom we can liaise
- 3) We have a point of contact in NSC with whom we can liaise on an *ad hoc* basis



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# Appendix A - full resident response site HE208037 - Land north of Short Lane, Long Ashton

## Executive Summary

This document sets out information in regard to the proposed development site allocation in Long Ashton, north of Short Lane and Heath Ridge, referenced as HE208037. The policies and legislation associated with this site, mature woodland on greenbelt land that lies outside Long Ashton's settlement boundary, highlight that it is significantly protected from development in order to protect both the species and habitats it contains, as well as the amenity, character and setting benefits that it brings to the village. Whilst it is understood that there are significant demands on housing allocation sites in North Somerset to meet government requirements, this document sets out why site HE208037 would be wholly unsuitable for such allocation. In addition to the policies herein, there are wide-ranging constraints identified below that render this area of land functionally undevelopable, and it should be excluded from allocation.

**Plan to show site HE208037 in Long Ashton**



The site is protected by the following neighbourhood, local, national policy and legislation as well as particular protections due to its ecological value:

**Neighbourhood policy, as per the Long Ashton Neighbourhood Development Plan 2013 - 2033:**

- ENV1 Area of Separation
- ENV2 Protection of trees and woodland
- ENV3 Maintain and enhance public rights of way
- ENV5 Conserve and enhance areas of value to nature or landscape
- ENV6 Protect against flooding

**Local policy:**

According to North Somerset's Local Plan 2040, this area is designated a "current wildlife site" on the policies map. Developing this land would not be in accordance with:

- Strategic Priority:
  - "To prioritise the importance and delivery of green spaces when considering new development, support priority habitats and species and safeguard areas at risk of flooding."*
- Sustainable development objectives 1.4, 3.2, 3.4, 3.5 and 3.6.
- Strategic Policies SP1, SP2, SP4, SP7, SP11
- Design and Place-making policies DP35, DP36 or DP37

- Numerous criteria in the North Somerset Plan 2040 Pre-submission Sustainability Appraisal

**National policy:**

The site is distinctly greenbelt (and not grey belt); National Planning Policy Framework (NPPF) paragraphs make it clear that high quality greenbelt land should not be developed when grey, brown and low quality (such as agricultural) land alternative options are available.

**Legislation:**

Furthermore, UK law protects many woodland animals which are present on the site. These animals and species include bats, bluebells, tawny owls, woodpeckers and deer. The following legislation is applicable:

- Wildlife and Countryside Act 1981
- Natural Environment and Rural Communities Act 2006
- Conservation of Habitats and Species Regulations 2010

**Ecology:**

- Part of the National Forest inventory
- Registered on the Priority Habitat inventory
- Identified on the Local Nature Recovery Strategy for woodland habitat
- The entire site is a Local Wildlife Site designated at the county level for its importance for wildlife.
- Developing this land would not be in accordance with policies DP35, DP36 or DP37 of the Local Plan 2040.
- Not feasible to comply with Biodiversity Net Gain (BNG) requirements.

Further details on all items are set out below.

## Site HE208037 description

Site HE208037 is a steep area of land (approx. 20m height difference in parts) to the north of Long Ashton. It is at the top of the ridgeline where the village meets the green belt, and is made up of mature woodland, connecting with other established woodland to the east and west of the village and creating an extensive biodiversity corridor across the wider area.

The woodland adds significantly to the rural character of Long Ashton, something which is highly valued by residents. It includes a popular public footpath through the site (part of the Long Ashton Village Circular Walk route) and connects with a public highway at Short Lane. At this point, in particular, there are a significant number of mature trees.

Species of note include hazel and ash trees, deer, bats, tawny owls, woodpeckers and bluebells. Photos of the site are included at the end of this document. The hazel and ash trees, in particular, are considered markers of ancient boundaries. As such they are an important record of the history of the parish.



*Satellite image showing site, with a public footpath running on the south and west side*

## Access

The proposed access is at the point where Highlands Road and Short Lane meet. From the Short Lane/Providence Lane end, there is simply not the capacity or the width to allow for movement of heavy machinery and the LGV movements required to build out a site of this size. Evidenced by the fact that smaller size refuse collection vehicles have to be used to empty bins on this stretch. Furthermore, Providence Lane already has capacity issues, as a single lane road with passing places. From the Highlands Road end, there are gradients of 20+ degrees, which would pose further difficulties for HGV access. This is compounded by on street car parking on all of these residential roads. Critically, there is nowhere to build a site compound or provide a turning point when accessing from the road since the site immediately slopes upwards.

If developed, day to day access to the site would also be problematic with an increased number of vehicles using the streets, particularly Short Lane, which would be the primary route for exiting via the top of the village. It is also very difficult to see how safe access could be provided that would meet North Somerset highways standards, with very limited capacity for features such as visibility splays.

### Images of Short Lane



Image to show Highlands Road access with a 20+ degree gradient:



Highlands Road is a challenging route which is wholly unsuitable for a higher volume of traffic that would come with the homes proposed. This is evidenced by a number of incidents and crashes that have happened in recent years, particularly in adverse weather conditions such as snow or ice, with vehicles skidding into parked cars, lamp posts or neighboring properties. Several properties have had to install crash bollards to mitigate this risk.

Moreover, the radius of the bend at the top of Highlands Road, combined with the gradient, makes it difficult for vans and lorries to manoeuvre, and they commonly end up having to mount the pavement, evidenced by repeated maintenance being required to the kerb and pavements over the last few years.

The roads will not be able to cope with the increase in traffic generated Somerset Council estimate that the average dwelling generates 8 vehicle movements per day. The development of this site would generate an additional 776 vehicle movements a day along these substandard roads causing a decrease in highway safety.

The likelihood of injury to drivers, passengers and pedestrians, as well as damage to property, would be considerably increased by the heightened road traffic associated with the proposed site.

## Ecology

This site is part of the National Forest inventory and is registered on the Priority Habitat inventory. It is also identified on the Local Nature Recovery Strategy for woodland habitat, meaning it has the highest strategic significance when calculating Biodiversity Net Gain (BNG) on the site. The entire site is also a Local Wildlife Site designated at the

county level for its importance for wildlife. These all represent significant constraints to development. Developing this land would not be in accordance with policies DP35, DP36 or DP37 of the Local Plan 2040.

Since this is a Local Wildlife Site, developing it goes against Policy DP35 of the Local Plan 2040 pre-submission plan. This policy is very clear that unless it can be appropriately mitigated, there should be no significant adverse effects on Local Wildlife Sites, Priority Habitat and that provision should be made to retain native woodland and veteran trees (both extensively present on the site). It is not possible to develop 97 houses on this site, adequately mitigate the loss of a Local Wildlife Site, retain the native woodland and veteran trees and also provide sensible access to the site during construction.

Since the site is Priority Habitat that contains veteran trees, there is also irreplaceable habitat on site. This makes compliance with Policy DP36 difficult, and means a bespoke agreement will have to be made with North Somerset council in order to comply with the BNG legislation. Any loss of trees with veteran features is unacceptable under BNG legislation, and this parcel of land contains numerous veteran trees.

The development of the site is further hindered by Policy DP37, which sets out the requirement to protect and retain canopy cover, and which also provides tree replacement numbers required. Given that the majority of the site is mature woodland, you would be looking at tree replacement requirements of between 4 and 8 times the number of trees currently present. This is not achievable alongside 97 houses.

There are many significant species within the mature woodland, all of which are protected by legislation, including the Wildlife and Countryside Act 1981, and some of which are protected by the Conservation of Habitats and Species Regulations 2017. These species include:

- Bats - pipistrelle bats nest and feed
- Wild deer - a species being protected locally at Ashton Court
- Bird species - including tawny owl and green and spotted woodpeckers
- Reptiles and amphibians - including grass snakes, slow worms, common newts, frogs and toads
- Ancient woodland including mature Ash and Hazel trees
- Bluebells

The following images of the site show the bluebells and mature woodland in Site HE208037, taken in May 2022:



Bats are of particular significance, to the extent that planning permission for alterations to homes along Heath Ridge have required a bat survey and had specific requirements to preserve and enhance them:



<p>6 The development shall not take place except in strict accordance with the measures outlined in section 5 of the submitted Building Inspection (dated 03.02.2020), section 5 of the Bat Surveys Report (dated 21.05.2020) and the Lighting strategy and wildlife enhancement site plan. If amendments to the methodology are required, details of the changes must be submitted in writing and agreed by the Local Planning Authority before relevant works proceed. The development shall then be implemented in</p>
<p>accordance with the agreed changes.</p> <p>Reason: To ensure compliance with the Conservation of Habitats and Species Regulations 2017, policy CS4 of the North Somerset Core Strategy and policy DM8 of the North Somerset Sites and Policies Plan (Part 1).</p>

*Excerpt taken from planning permission approval for house alterations on Heath Ridge in 2020.*

Additionally, when Miners Close was developed, North Somerset Council imposed an s106 planning condition that a strip of land was set aside permanently as an ecology area and corridor for wildlife. It is located between the houses/gardens in Miners Close and a wall abutting the golf course. The owners of the properties in Miners Close are required to maintain it as an area for wildlife and have limited access for maintenance and conservation. If the proposed housing development was built, it would remove the wildlife corridor that connects this s106 strip to the woodland above Short Lane and Heath Ridge (and further East).

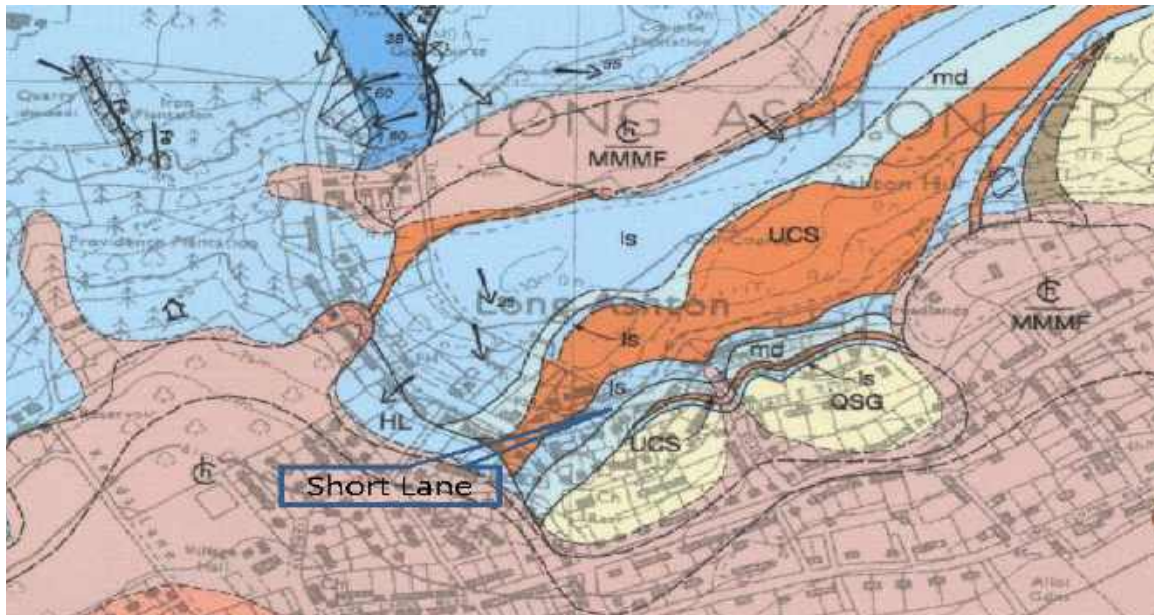
Ecologically, it is neither a suitable or sustainable site. In addition to the harm to the existing ecology, under current Biodiversity Net Gain (BNG) legislation, it would simply not be feasible to fit 97 homes on the site and still hit 10% BNG.

## Geology

The site has complex geology, mostly consisting of hard rock - limestone and Upper Cromhall Sandstone. The bedrock is very near the surface in this area. Given the gradients on the site, there would have to be extensive excavation and regrading to make development possible, and the presence of rock would make this extremely difficult, time-consuming and expensive to do, reducing the viability of any project. Moreover, these groundworks, for the requisite roads, houses and infrastructure would pose considerable risk of vibration damage and destabilisation to nearby houses and

gardens. Houses at the top of the village already feel the vibrations from works in the quarry, half a mile away, due to the bedrock. The highest risk applies in relation to the houses in Heath Ridge and Short Lane where some of the gardens are very steep and, given the age of the properties, don't include the extensive foundations and ground-supporting or retaining structures which would be required if those houses were built now. If there was any vibration damage to houses or destabilisation of ground to gardens, the English courts are likely to grant an immediate injunction as damages would be an inadequate remedy. This poses a significant unknown risk to a developer.

See the Geology map below for evidence of the approximate site composition:



## Capacity

Site HE208037 is an extremely steep site (approx. 20m difference from the north to the south), mainly covered by mature woodland. The slope ranges from 18-24% which will significantly reduce the capacity of the site due to the need for regrading and deeper footings. This would increase the cost of the developable area.

The presence of the public footpath running through the proposed site, which would need to be maintained, further limits the developable area.

As such, and in combination with the aforementioned ecological requirements, it is simply not possible to accommodate even the 75 houses proposed by the submitter of the site, let alone the 97 homes proposed in the consultation by NSC. With diminishing numbers, the potential for the site to support affordable housing would clearly be very limited.

## Green Belt Issues

Development of this site will cause damage to the green belt; one of the purposes of the green belt is to prevent neighbouring towns from merging into one another.

The Green Belt in this area has recently been reviewed.

The Green Belt Review Part 2 Villages in the Green Belt January 2022

“Long Ashton is one of the larger villages in the Green Belt in close proximity to Bristol with little land separating it from the city, the importance of maintaining its separate identity was recognised in the original boundary justification set out in the South West Avon Green Belt Local Plan and has most recently been re emphasised in the Long Ashton Neighbourhood Plan with the introduction of a policy protecting an ‘area of separation”

Another purpose of the Green Belt is to assist in safeguarding the countryside from encroachment. This development will encroach into the countryside and will set a precedent for other areas bordering Long Ashton to be considered for development.

Another purpose of the Green Belt is to preserve the setting and special character of historic towns. Long Ashton is an historic village which is protected by a conservation area. The established setting is the high areas of mature woodland which act as a backdrop to the housing.

## Detrimental Visual Impact and Landscape Harm

The Green Belt Review Part 2 Villages in the Green Belt January 2022 also considered the landscape character of this area.

“The village takes a linear form along the ridge line and is highly visible from the south on the ridge below woodland. The village is not open in character and there is a clear distinction between the built-up area and the surrounding Green Belt which is mainly open farmland or woodland”.

“The character of the area is protected due to the entire built-up area being designated as a conservation area. The surrounding land is protected woodland or part of the Ashton Court Estate”.

The development of this site would be highly visible from the South and erode the character of the village with its existing clear boundaries between the built up area and

the surrounding countryside which is designated as Green Belt consequently harming the landscape character of the area and encroaching into the countryside.

## Unsustainable Development

The proposed development would not meet the requirements of sustainability, economically, socially nor environmentally as required by the NPPF. The residents of the development would effectively be reliant upon the private car to access shops, schools and the workplace. As previously stated the development would create an additional 776 traffic movements per day.

## Pressure on local services

The development of 97 houses would put pressure on local services such as schools, doctors, drainage and sewage which are already at or near to capacity.

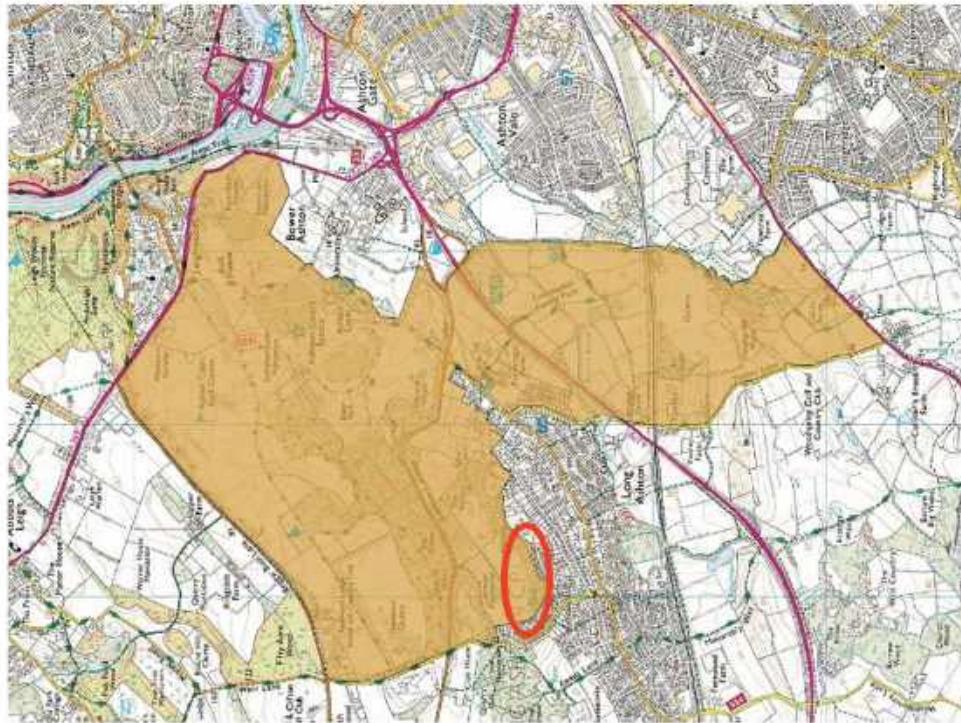
# Long Ashton Neighbourhood Development Plan policies

The following policies are contained within the Long Ashton Neighbourhood Development Plan, focused on Protecting and Enhancing the Local Environment, and very clearly highlight the unsuitability of the proposed site.

## ENV1 Area of Separation

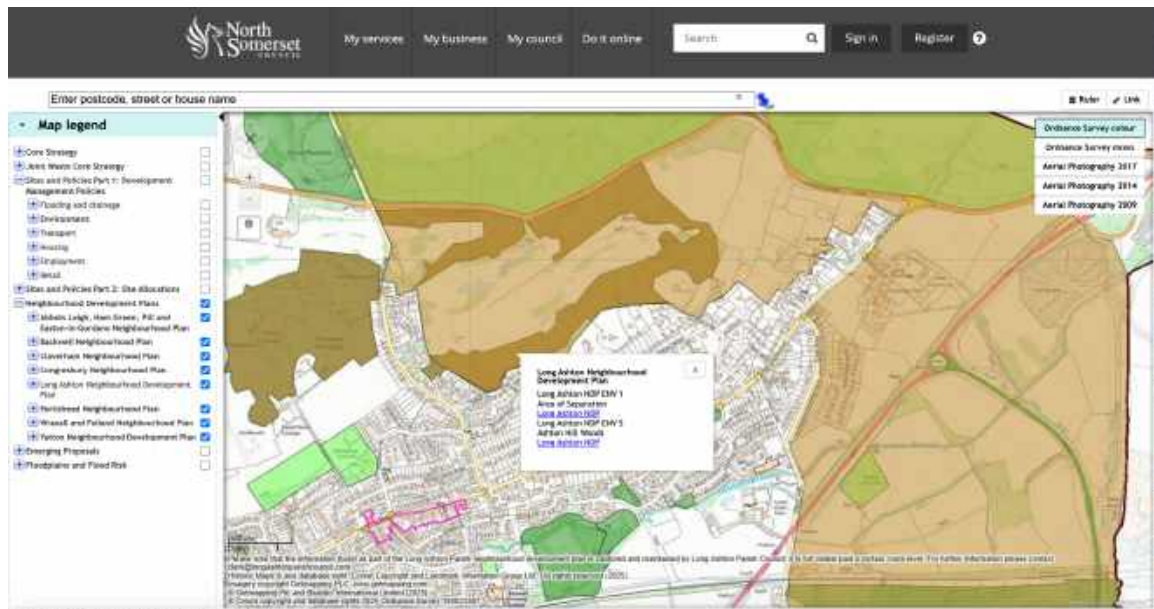
*'An Area of Separation has been designated, extending from the east of Providence Lane and Longwood Lane in the north, clockwise to the east of Wild Country Lane in the south and extending to the border of the parish. (Map 6) as an area of the parish that is required to remain open in aspect in order to maintain an actual and visual separation between the City of Bristol and the parish of Long Ashton. This area lies within the Green Belt and development that threatens the open and rural aspect of this land contrary to Green Belt policies will not be permitted.'*

**6.6 Map 6, Policy ENV1, Area of Separation, (Note rotated with north to left)**



Site HE208037 is located within the Green Belt designated area of separation to 'maintain an actual and visual separation between the City of Bristol and the parish of Long Ashton.' The location of the site is highlighted by the red circle.

The following map is taken from the North Somerset Policies Map, showing ENV 1 and 5, highlighting how site HE208037 sits in a high quality, protected area of Long Ashton.



## ENV2 Protection of trees and woodland

*'Development that damages or results in the loss of ancient trees or trees of good arboricultural and amenity value will not normally be permitted. Development proposals must be designed to retain trees and ancient trees or trees of good arboricultural and amenity value. Development proposals for sites including mature trees (i.e. 600 mm girth or greater) should be accompanied by a tree survey that establishes the health and longevity of any affected trees and a long term maintenance plan.'*



Google satellite image of site HE208037 and extent of tree cover across the site



Street view from Short Lane, looking east towards Heath Ridge, showing mature trees along ridgeline in site HE208037

ENV3 Maintain and enhance public rights of way

*'The current footpath and bridleway network is to be retained and maintained. Where practicable, and without loss of character, enhanced to provide access for all. Opportunities to enhance the network will be investigated in any relevant development.'*

*Any development proposals will be required to retain existing rights of way and where appropriate to the scale and location of the development, improvements will be required to enhance the public right of way network.'*

The map below taken from the Ordnance Survey website shows a public footpath wrapping along the southern and western edge of the proposed site. As set out in the policy above, it is therefore required that these paths and their setting are enhanced in terms of character. Any development would be detrimental to the footpath setting. This footpath, and the myriad of other paths through the woodland, are heavily used by walkers, as an important access for residents at the top of the village to green space and to cross the golf course to Ashton Court.



#### ENV5 Conserve and enhance areas of value to nature or landscape

*'Any development proposal must conserve and enhance the wildlife, biodiversity and historic assets of the village. Appropriate public access shall be provided to areas that will be designated for wildlife, where this does not detract from the wildlife value. The following, areas are identified (as shown on the Map 7) as areas of local ecological and landscape value: Hanging Hill Wood, Ashton Hill Plantation (including Cooks Wood, Shipley Brake and George's Plantation), Keeds Wood, Iron Plantation, Providence Plantation and The Brake Fenn's Wood, Ashton Hill Woods (including The Folly and Coombe Plantation), Nightingale Valley and Stokeleigh Camp Reservoir and surrounding land.'*

Map 7 is shown below and shows that the proposed site HE208037 is positioned over the area protected by ENV5, where the land must 'conserve and enhance the wildlife, biodiversity and historic assets of the village'. A number of protected species have been identified in the woodland area, and therefore their protection and contribution to local wildlife and biodiversity is paramount. This would mean development here would be unacceptable and not permitted.

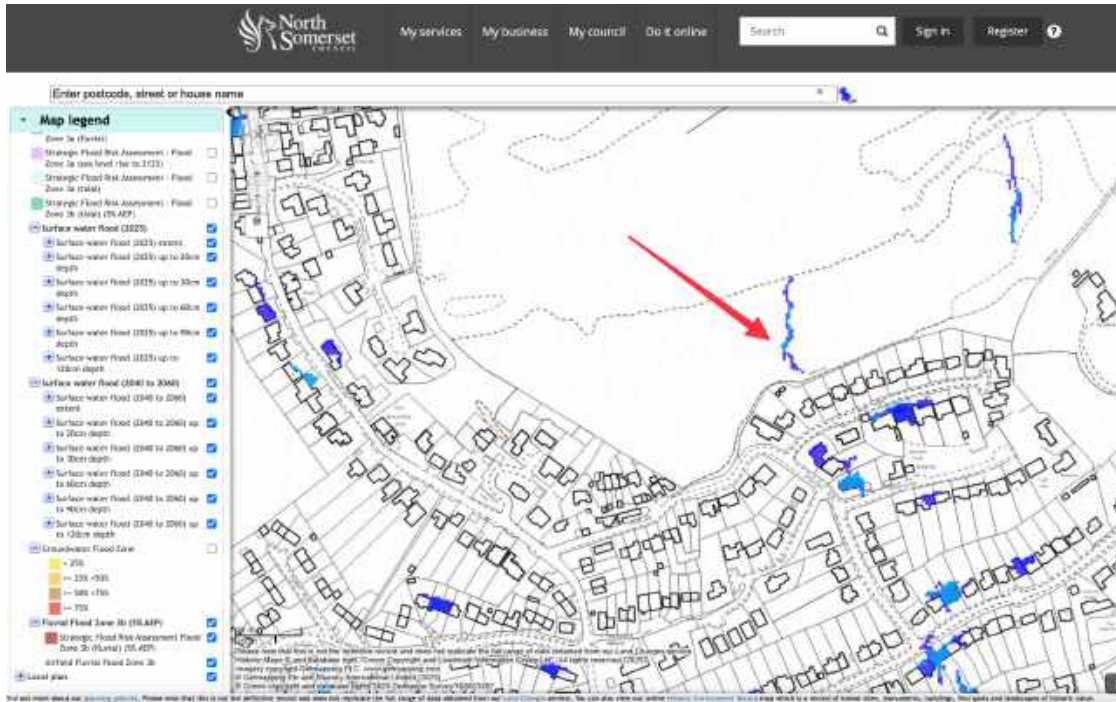


## 6.7 Map 7 Policy ENV 5, Areas of Value to Nature or Landscape

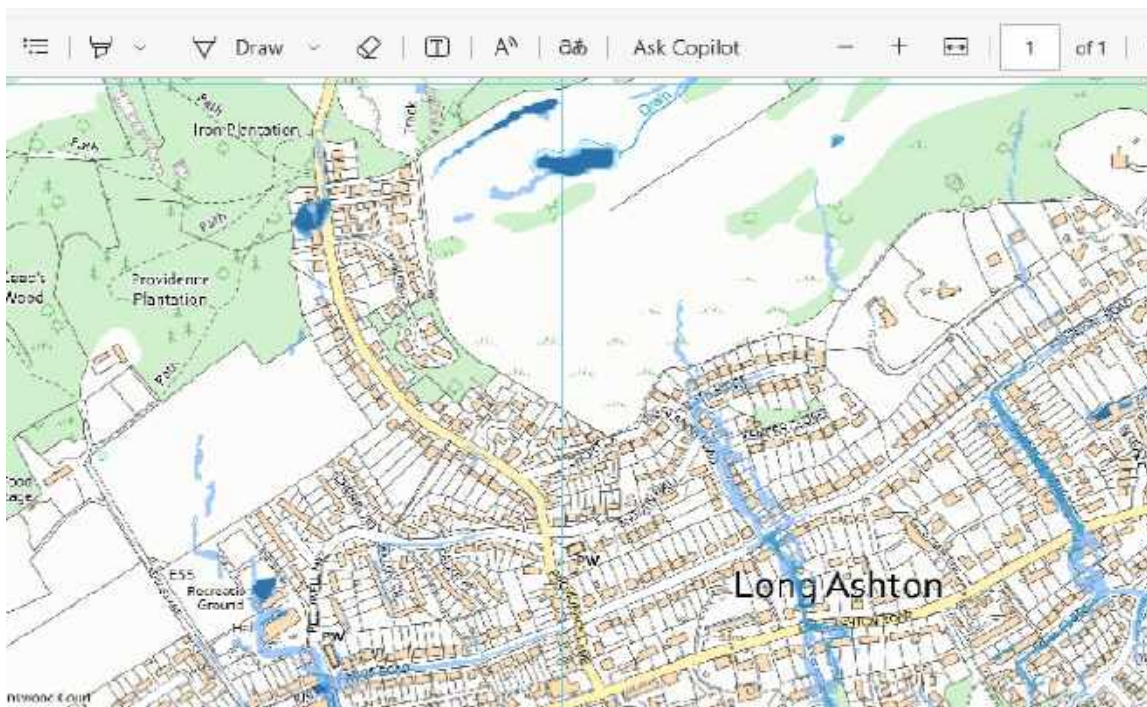


### ENV6 Protect against flooding

The area of woodland and scrub in site HE208037 is critical for absorbing significant amounts of rainwater during peak rainfall. The area at the top of the ridgeline is a golf course (open manicured grassland) that is mainly low in biodiversity and woodland, minimising its capacity to absorb or retain water. This means that there is significant water runoff down the hill towards the centre of Long Ashton during peak rainfall. This is identified on both the NSC surface water flood map:



As well as the following map, taken from the NSC Strategic Flood Risk Assessment, which clearly shows the routes of surface water runoff below the site:



This is not a theoretical risk. The impact of this runoff water has been seen and evidenced on several occasions. A recent example of excess surface water flooding

was on 17<sup>th</sup> June 2020, after a period of extreme hot weather ended with a rainstorm. With the surface clay hard and unabsorbent, water cascaded from the golf course slopes, down Highlands Road, flooding Ridgeway Road, lifting and dislodging the surface water drain manhole cover in the road, then flooding the garden of 39 Ridgeway Road and the property below, and flooding Long Ashton Road. Even with the existing woodland and vegetation, the area is at high risk and development on this site would only serve to exacerbate this.

As has been well documented, climate change is already affecting weather patterns and dramatically increasing the frequency and intensity of extreme weather events so it is essential that this woodland is maintained to help lessen the impact of storm run-off.

As part of any planning permission for development on the site, the Environment Agency would require that the development does not make existing flooding any worse. This will be very difficult to achieve on this site. With 97 houses on the site, in excess of 75% of the development's surface area would likely be impermeable surfaces such as roofs, paving & roads. The water storage capacity required for a Sustainable Drainage System ("SuDS") would be very substantial and would need to take into account the increased risk of intense rainfall events as a result of climate change. The most likely SuDS option would require the excavation of one or more very large storm/storage tanks, as there would be insufficient ground space for swales and balancing ponds. Even if excavating storm tanks was practical, the significant presence of bedrock close to the surface would make this exceptionally challenging, time-consuming and expensive. It is also likely that water stored in SuDS infrastructure would only infiltrate very slowly, given the geology. The consequence is likely to be that excess water will still need to be connected into the existing surface water drains.

### **Connection to public foul drains/sewer**

The foul drains/public sewers in the area of Long Ashton immediately below the site are already classified as "critical". The diameters of the pipes are 150mm in Heath Ridge and Highlands Road downstream as far as the inspection cover in the front garden of 6 Highlands Road. There the diameter increases to 225mm and continues at that diameter all the way until it connects to the 450mm trunk sewer at a point between 11 Theynes Croft and 2 Gardeners Walk.

If a 225mm diameter pipe is sufficient from the site itself, the likely consequence would be that the new connection is routed through the garden of No 12 Highlands Road, under Heath Ridge, through the garden of 19 Heath Ridge, then 10, 8 and 6 Highlands Road, with disruption and compensation to those property owners. But, if the existing 225mm diameter pipe is insufficient for the additional capacity required by the properties in the proposed site, this might mean replacing the entire sewer downstream all the way to the 450mm trunk sewer in Theynes Croft. Some of the route passes under the gardens of different private properties. It would also probably mean moving the sewer in

Highlands Road to be under the road, rather than passing through front gardens (as it largely does now). There are too many other services (gas, water, electricity and phone/fibre) for the sewer to be routed under the footpaths. Given the ground conditions in the Highlands Road area (see Geology section below), the disruption and additional cost that would be caused is likely to be very significant.

## National Planning Policy Framework

The following policies in the NPPF are important to consider in reference to this site:

**142.** *The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

**145.** *Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.*

**148.** *Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.*

**153.** *When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.*

**155.** *The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply: a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan; b. There is a demonstrable unmet need for the type of development proposed;*

In reference to paragraphs 142, 154 and 153, development on this site would cause harm to the green belt due to its ecological value, wider connections with biodiversity corridors along the ridgeline and its contribution to the character and setting of Long Ashton (part of which is a Conservation Area).

In reference to paragraph 148 and 155, as set out at the beginning of this document, site HE208037 is high quality woodland with protected species, and would therefore sit below other site options that are either on previously developed, grey belt or low quality agricultural land, which would be considered higher priority sites for development.

## Non-compliance with North Somerset Local Plan 2040 Policies

The proposed site is in direct contravention of the following policies within the proposed [North Somerset Local Plan 2040](#).

	<b>Plan Wording</b>	<b>Impact at the proposed site</b>
<b>DP1</b>	<i>“...will support biodiversity and access to wildlife corridors and green space and which will future-proof the development against changing climatic conditions and help carbon storage”</i>	Development at the site would dramatically restrict wildlife corridors and green space, limiting carbon sequestration, reducing the natural cooling effect that the woodland provides and exacerbating the surface water run-off that has already caused numerous instances of flooding during extreme weather events.
	<i>“The design and layout <b>should not prejudice the living conditions for the occupiers</b> of the proposal or that of adjoining occupiers <b>through loss of privacy, overlooking, overshadowing or overbearing impact</b>”</i>	Houses along Heath Ridge, that were not designed with neighbouring properties in mind along the northern boundary, would have their privacy severely impacted as the steep gradient would mean that they were entirely overlooked and overshadowed.
<b>DP2</b>	<i>“It would not harm the street scene and local area such as through the <b>loss of characteristic boundary features</b>, original estate layout landscaping or <b>visually important trees</b>”</i>	The tree line above Heath Ridge is a defining characteristic of the boundary of the village and has numerous mature trees.
	<i>“The living conditions of the occupiers and adjoining properties would not be prejudiced.”</i>	As stated above, adjoining properties to the site would have their living conditions prejudiced to a much further extent than were it a flat site. It would not be possible for any of the adjoining houses on Heath Ridge to establish a degree of privacy without 20-30ft high fences to the rear of the properties.
<b>DP5</b>	<i>“Avoid areas vulnerable to increased flooding, taking account</i>	As mentioned above and in the section on surface water, the woodland and scrub

	<i>of the latest climate projections; Incorporate measures to improve resilience to potential flood risk both on site and in the wider area; Protect existing and provide a net gain in biodiversity”</i>	areas are critical for absorbing rainwater, particularly during extreme weather events. The monoculture of the golf course provides little in the way of absorption.
<b>DP8</b>	<i>All new development proposals must demonstrate that they have made effective and efficient use of land. Proposals will be supported which: • Enable the reuse and regeneration of previously developed land; • Ensure that all parts of the site have a positive purpose; and • Prioritise higher densities at more accessible locations such as town centres, local centres and transport hubs. <b>The minimum target net density will be 40 dwellings per ha, but this should be higher at accessible locations.</b></i>	The land is greenfield, high quality woodland. The site area is 2.7ha and as it has a steep gradient it is unlikely to be able to accommodate many homes due to the extensive ground works required. It would not be able to accommodate the suggested 97 homes. On a site area of 2.7ha, this policy would require 108 homes to meet the 40 dwellings per hectare, which is not possible.
<b>DP12</b>	<i>“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. The construction of new buildings shall be regarded as inappropriate development. Exceptions to this are set out in the NPPF.”</i>	As set out earlier in this document, this site is not considered an exception to Green Belt policy due to its high quality, biodiversity and contribution to local character. Particularly as there are grey belt or low quality green belt alternative site options being considered.
<b>DP14</b>	<i>“Development will be permitted provided it would not prejudice highway safety or inhibit necessary access for emergency, public transport, service or waste collection vehicles.”</i>	As set out earlier in this document, access to the site can only be provided on a winding narrow country lane or a 20+degree gradient street. Turning space and safe access into the site will be challenging.
<b>DP35</b>	<i>Refer to Ecology section above</i>	
<b>DP36</b>		
<b>DP37</b>		

## Non-compliance with North Somerset Plan 2040 Pre-submission Sustainability Appraisal objectives

The site does not comply with the following criteria in the [North Somerset Plan 2040 Pre-submission Sustainability Appraisal](#), used to assess the Strategic Options.

<p><b>Objective 1.4:</b> <i>Promote the optimal use of land which supports regeneration, maximise re-use of previously developed (brownfield) land and protects BMV and the agricultural economy</i></p>	<p>The land is high quality mature woodland, which has not been previously developed.</p>
<p><b>Objective 1.5:</b> <i>Promote development which requires a deliverable level of high quality and sustainable infrastructure</i></p>	<p>The site could not accommodate enough homes to allow for strategic infrastructure alongside it.</p>
<p><b>Objective 2.1:</b> <i>Boost delivery and meet the housing need identified within the plan period</i></p>	<p>The site could not accommodate anywhere near the 97 homes suggested in the proposal would be very difficult to deliver.</p>
<p><b>Objective 2.2:</b> <i>Deliver affordable or specialist housing where it is most needed</i></p>	<p>The slope of the site and the consequent earthworks required to make it viable means that it would be a very expensive site to deliver. In turn, this will mean that the amount of affordable homes would be very low, if any. Moreover, gradients on the site would make it very challenging to provide homes that are suitable for specialist housing needs.</p>
<p><b>Objective 3.2:</b> <i>Contribute to reducing vulnerability to tidal &amp; fluvial flooding, without increasing flood risk elsewhere. Also minimise surface water flood risk and harm to water quality and availability</i></p>	<p>The removal of the existing woodland would increase surface runoff towards Long Ashton and increase flooding.</p>
<p><b>Objective 3.4:</b> <i>Minimise impact on and where appropriate enhance treasured landscape/townscape such as the Mendip Hills AONB</i></p>	<p>It would have a direct impact on high quality and treasured landscape, including the well used 'Long Ashton Village Circular' footpath.</p>
<p><b>Objective 3.6:</b> <i>Protect and enhance Biodiversity, Geodiversity and Green Infrastructure, particularly with respect to protected habitats and species</i></p>	<p>It would destroy rather than protect or enhance biodiversity, geodiversity and green infrastructure.</p>

# Appendix B - specific answers from Officers to questions generated by LAPC prior to responding to this consultation

## 1. Transport Infrastructure

**Question:** Considerable extra traffic will be generated by EPIC, current & potential airport expansion and Longmoor Village. With an estimated 8,400 cars created by the most suitable and other potential developments in Long Ashton & Dundry parishes, what is the plan to cope for the extra road traffic ? And what is the provision for an increase in increase in safe, accessible and attractive cycleways, footpaths & bridleways?

**Answer:** The Council are working on a transport masterplan for the Ashton Vale, Long Ashton area, including the A38, A4174 and A370, given the EPIC permission, Bristol Airport expansion plans and potential development site Ashton Vale (should it be added to the emerging North Somerset Local Plan following consultation). This will involve working closely with major stakeholders including land promoters, the parish council, ward members, the local community, Bristol Airport, Active Travel England, National Highways, Network Rail and bus operators, as well as Bristol City Council and the West of England Combined Authority, to understand current barriers to transport connectivity and identifying solutions for investment and delivery of an improved, inclusive and sustainable transport network for all.

## 2. Climate change & Biodiversity Loss 2040

**Question:** Recent reports show that national and local governments are not reaching international targets. How do you plan to meet these requirements by 2040 and can you evidence your answer?

**Answer:** The council declared a climate emergency in 2019 and in November 2019, published the first climate emergency strategy and action plan, to reduce greenhouse gas emissions across North Somerset and improve our resilience in a changing climate. Details can be found on our website:

<https://n-somerset.gov.uk/council-democracy/priorities-strategies/climate-emergency/our-plans-tackle-climate-change>

The council declared a nature emergency in 2020 and is responding to this through various initiatives such as the Green Infrastructure Strategy and the Local Nature Recovery Toolkit.

In terms of the emerging Local Plan addressing the climate emergency is a key consideration and is reflected in the vision and the strategic objectives. The vision states:



“By 2040 there will be a transformation in the way we live which reflects a more responsible attitude to climate change and the use of resources. New homes, buildings and communities will be highly sustainable, accessible and attractive places with higher quality standards. There will be more diversity in terms of the form and type of new development to increase variety and choice to better meet the needs of all, create jobs and to tackle inequality. Regeneration will transform and breathe new life into existing towns and valued areas will be protected. People’s well-being, a strong sense of community, opportunity and fairness will be at the heart of all development in North Somerset”.

The strategic priorities are as follows:

- To promote sustainable development and address the climate emergency.
- To deliver the zero carbon ambition by maximising the opportunities for low carbon development and the use of renewable energy.
- To develop new and existing communities in a way which enhances health and wellbeing, reduces inequalities and is child and family friendly.
- To increase the number and range of job opportunities across the district, particularly at the towns to give people the opportunity to work near to where they live.
- To prioritise the location of new development close to places with a wide range of services, facilities and job opportunities.
- To address the decline in the town centres of Weston-super-Mare, Clevedon, Nailsea and Portishead through supporting regeneration and place-making initiatives which revitalise these places as the focus for retailing, community uses, housing and jobs.
- To reduce car use, encourage walking and cycling, and high quality and effective public transport.
- To deliver a diverse range of housing in a variety of tenures, sizes and forms, particularly genuine affordable housing, to meet future needs of North Somerset residents at locations where they are most needed.
- To deliver essential new strategic transport infrastructure to support new development and enable more sustainable travel options.
- To deliver higher residential densities through good design, particularly at town centres, transport hubs and on brownfield sites.
- To provide essential infrastructure in step with development, both transport infrastructure and community infrastructure such as schools, healthcare facilities and community centres.
- To prioritise the importance and delivery of green spaces when considering new development, support priority habitats and species and safeguard areas at risk of flooding.

This is reflected within the strategic and detailed policies within the plan including (but not exclusively as the theme runs through many policies):

SP1: Sustainable development - Make a positive contribution to addressing and demonstrating resilience to the impacts of climate change and delivering the net zero target.

SP2: Climate change - Development proposals must demonstrate how they will address both the mitigation of climate change and the adaptation to its effects, encourage the decarbonisation of energy and transport, and support the delivery of a carbon neutrality in North Somerset by 2030.

DP5: Climate change adaptation and resilience - All development will need to demonstrate that the vulnerability to climate change has been taken into consideration through the provision of a climate change adaptation statement, which can form part of the sustainability/ energy or the design and access statement.

DP6: Net zero construction - All development must be designed to minimise its impact on the environment and create high quality internal and external spaces for people to use. All new buildings will be required to achieve net zero operational energy compliance in respect of both regulated and unregulated energy and minimise embodied carbon. All major development will need to set out how embodied emissions have been taken into consideration through the production of an embodied carbon assessment.

DP7: Large scale renewable energy generation - Proposals for energy generation from renewable and low carbon sources including wind turbines, solar photovoltaic arrays, biomass and hydropower (marine, river and tidal) schemes will be supported subject to certain criteria.

DP9: Flood risk - All development must consider its vulnerability to flooding, taking account of all sources of flood risk and the impacts of climate change.

DP16: Public transport accessibility - All residential development should be within reasonable distance of a direct and frequent bus service providing access to a good range of facilities, services and jobs via a direct, safe and attractive pedestrian route.

DP17: Travel plans - Travel Plans will aim to reduce car use generated by the development and to deliver other sustainable transport objectives, related in scale and kind to the development.

DP31 Green infrastructure - Proposals will, where appropriate, ensure that green infrastructure and maximises the opportunity to respond to climate change and meet biodiversity net gain requirements.

DP35: Nature Conservation - Development proposals must take account of their impact on local biodiversity and identify appropriate mitigation measures to safeguard or enhance attributes of ecological importance and deliver biodiversity net gain.

DP36: Biodiversity Net Gain - Where biodiversity net gain (BNG) is required, proposals must demonstrate at least a 10% net gain accounted for in a biodiversity gain plan. Appropriate provision must be made for its planning and design, taking account of habitats and species affected, relevant local plan policies and planning guidance, and Natural England biodiversity metrics.

### 3. Green Belt concerns

**Questions:** Several Government reports mention the importance of retaining and enhancing Green Belt to mitigate the adverse impacts of climate change & biodiversity loss (see attached document) so:

(a) What is the total percentage of Green Belt in Long Ashton?

(b) What percentages do you propose to lose for (i) most suitable and (ii) potential?

**Answers:** The percentage of Green Belt in Long Ashton parish is 70%. This is the whole of the parish excluding the settlement of Long Ashton which is currently inset from the Green Belt and a small corner of the parish where the leisure centre is located which is also not covered by the Green Belt.

Site HE20110 identified as 'most suitable' straddles the parishes of Long Ashton and Dundry. The site size as shown in the consultation is 205ha which is 1% of the North Somerset Green Belt.

**Questions:** How will you compensate us – and Dundry – for the losses in (i) openness, (ii) high quality landscape (iii) public access to high quality green & blue space (iv) loss of potential nature recovery & regenerative agriculture chances?

**Answers:** The NPPF (para 156) sets out 'Golden Rules' that any major development involving the provision of housing on land released from the Green Belt through plan preparation or subject to a planning application. One of the Golden Rules is the requirement for provision of new, or improvements to existing, green spaces that are accessible to the public. It states that new residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.

Para 159 of the NPPF provides more detail stating:

"The improvements to green spaces required as part of the Golden Rules should contribute positively to the landscape setting of the development, support nature recovery and meet local standards for green space provision where these exist in the development plan. Where no locally specific standards exist, development proposals should meet national standards relevant to the development (these include Natural England standards on accessible green space and urban greening factor and Green Flag criteria). Where land has been identified as having particular potential for habitat creation or nature recovery within Local Nature Recovery Strategies, proposals should contribute towards these outcomes

### 4. Sustainability, affordable housing & other infrastructure challenges:

**Question:** Will there be a commitment to sustainable building practices and energy-efficient homes?

**Answer:** The Regulation 19 plan approved by North Somerset Councils Executive Committee in July 2024 contains draft policy DP6: Net zero construction which requires all new buildings to achieve net zero operational energy compliance in respect of both regulated and unregulated energy and minimise embodied carbon and all major development will need to set out how embodied emissions have been taken into consideration through the production of an embodied carbon assessment. Draft policy DP5: Climate change adaptation and resilience requires all new development to demonstrate that the vulnerability to climate change has been taken into consideration through the provision of a climate change adaptation statement, which can form part of the sustainability/ energy or the design and access statement.

**Question:** How will affordable housing be prioritised to meet local needs?

**Answer:** Social housing is allocated to residents based on eligibility criteria one of which is the requirement to have a connection to North Somerset either through family, residency or employment. The criteria are listed on the councils website: <https://n-somerset.gov.uk/my-services/housing/applying-social-housing>

**Question:** For the proposed orange sites, how will new development integrate with the existing village rather than becoming a separate 'estate'?

**Answer:** The sites coloured orange are identified at 'other potential'. This means that they conform with the spatial strategy and could be considered if it is not possible to meet the housing requirement on the strategic sites identified as 'most suitable'. The relationship of any site to the existing settlement will be a key consideration if it was felt they could be a potential allocation.

## 5. Specific questions on the 'most suitable' site HE 20110

**Question:** Do you see HE 20110 (Woodspring & Dundry slopes) as a separate village or town?

**Answer:** As part of the Additional Sites consultation North Somerset Council are seeking views on what form a strategic allocation at south west Bristol could take. No decisions have been made about this and it is a key consideration that will need to be explored further through continued engagement with the relevant local communities and established through more detailed master planning work.

**Question:** How will residents in the new development cross the A38, A370 and SBL? Underpasses? Traffic lights?

**Answer:** The existing severance caused by major transport corridors is recognised and the forthcoming transport masterplanning work will outline the issues and solutions for improving permeability and access as per the Council's adopted hierarchy of transport users (see page 5 of the Council's adopted North Somerset Council Transport Behaviour

Change Action Plan), if required once the sites proposed for allocation have been identified following the consultation.

**Question:** Bearing in mind the road constraints imposed by (4b above) how do you propose to create thriving communities rather than dormitory towns? Or is that left to the developers?

**Answer:** Further detailed masterplanning work will be undertaken for the strategic sites by North Somerset Council in consultation with local communities and stakeholders. This will be a key aspect in shaping the future of any proposed allocation.

**Question:** The boundaries of the current 'Woodspring' (yellow site) don't seem to follow geographical contours or land ownership so how much could they change between now and the next map?

**Answer:** The Woodspring site is the landownership area submitted for consideration through the plan-making process. Following the close of the Additional Sites consultation we will be assessing all the sites in further detail considering comments received through the consultation, physical constraints or features on the sites, potential capacity and delivery issues, all of which will inform the final proposed site boundary.