

**Minutes of a Zoom Virtual Meeting of the Planning Committee of
Wrington Parish Council
held at 6.30pm on Tuesday 12 January 2021**

Present:

Cllr B Taylor (Chair)	Cllr D Yamanaka
Cllr J Steinbach	Cllr H Ward
Cllr L Samuel	Cllr P Neve
Cllr G Bigg	Cllr L Vaughn
J Bishop (Assistant Clerk)	

In attendance: Two representatives from 'Keep Wrington as Wrington'

1 Apologies for absence

Apologies were received from Cllr Treweek (received during the course of the meeting).

2 Declarations of Interest

There were no declarations of interest.

3 Public Participation

Two representatives from the group 'Keep Wrington as Wrington' (KWAU) attended to hear the Council's discussion on 20/P/2990/OUT (Land to the west of Butts Batch, Wrington). They outlined the strength of local opposition to the proposed development citing the fact that there are over 140 objections on NSC's website. KWAU have also conducted a survey with 83 out of 85 respondents saying they object to the proposed development. There was also good attendance at a recent virtual village meeting. The representatives highlighted the following areas of concern identified by the respondents to the survey:

- Increased traffic through the village leading to congestion and safety concerns.
- The site is an agricultural green field site.
- Lack of school places.
- Inadequacy of other local services.
- Ecological concerns about loss of conservation and habitat.
- Increased flood risk.

The representatives asked the Council to request NSC defer a decision on the application until the Neighbourhood Plan is completed so the full wishes of the village can be understood. This is especially important as the site sits outside the settlement boundary and policy Core Strategy CS32 is specific that these types of sites should only be considered if they fit in with Local or Neighbourhood Plans. Furthermore:

- KWAU believe the disadvantages of building on the site far outweigh the advantages.

- The breach of the village boundary could set a precedent. Development is causing other local villages to blend into each other and Wrington risks losing its distinct village character.
- Again policy CS32 says that proposals should not be approved that on their own, or in aggregate, cause significant adverse impacts on the character and functioning of a village.
- It is believed Strongvox own a larger portion of land than the area they are currently proposing to develop. Therefore, they may intend to build further west beyond the village boundary in the future.
- The impact on the village of the Cox's Green development is not yet known.
- Returning to increased traffic numbers - it is not feasible for most people to take active transport methods to work. They are unlikely to get their children into the local school and it is necessary to drive to Wrington Vale Medical Practice. It is also believed the local bus service will cease operation at the end of March. All of this leaves people with no choice but to drive, leading to congestion and pedestrian safety issues. There are several places without a footpath and with limited potential to create one.
- Visual impact – KWAU feels Strongvox have played down the topology of the site and the development would erode the view of the Grade I listed church, not only locally but from Dolebury Warren AONB. The development would dominate the entrance of the village from the south, losing the rural character of the village. To the northern side of the site, Wiltons and Westward Close would lose both privacy and light due to the height of Butts Batch.
- Returning to flooding – at the Cox's Green development, despite all of the attempts to alleviate the flood risk, the developers of that site have had to install a second attenuation pond. Looking at the Geology Report for the Butts Batch site it is hard imagine how the impact of creating a built and tarmaced environment can be mitigated against.
- NSC has declared a climate emergency and KWAU believe this application does not meet the requirements of NSC's climate emergency action plan, for example, transport and sustainability. There are potential brown field sites available locally which should be prioritised from a climate emergency perspective.

Cllr Taylor thanked the representatives for the presentation.

4 Minutes of the previous meeting

The Minutes of the meeting held 15 December 2020 reviewed and adopted as a true record. There were no matters arising.

5 NSC Planning and Regulatory Committee

The only items of direct relevance to the parish discussed at the meeting on 16 December were:-

- An appeal against an Enforcement Notice issued on Worships Farm, Redhill
- The dismissal by the Planning Inspector of an appeal against NSC's refusal of 19/P/2514/FUH (Cinderford Cottage, Ropers Lane, Wrington).

The papers for the next meeting, 20 January, were not yet available on NSC's website.

6 Decision Notices issued by NSC

A list of Decision Notices had been circulated prior to the meeting and these were noted. In summary:-

- 20/P/1771/CQA - Havyatt Green Farm, Copthorn Lane, Wrington, Bristol, BS40 5DE – refused
- 20/P/2474/FUL - Meadow Cottage, Lye Hole Lane, Redhill, Bristol, BS40 5RN – approved
- 20/P/2716/FUH - High Gate, Ropers Lane, Wrington, Bristol, BS40 5NH – approved
- 20/P/3063/TRCA - Greens Wood, Ropers Lane Wrington, Bristol, BS40 5NH - approved

It was also noted 20/P/3003/TRCA (3 Bells Walk, Wrington Bristol BS40 5PU) had been approved with this established after the meeting papers had been circulated.

7 Planning Applications

A list of planning applications, along with draft comments, had been circulated with the meeting papers, Cllr Taylor summarised them as follows:

- **20/P/2999/FUL - Land Off Winters Lane, Redhill**
No objection.
- **20/P/3011/FUH - Ashley House, Silver Street, Wrington, Bristol, BS40 5QE**
No objection.
- **20/P/3014/FUH - Old School House, Church Road, Redhill, Bristol, BS40 5SG**
No objection but with a comment that the Council would prefer to retain the tree as it had amenity value but would be content with a crown reduction of, say 20%, as suggested in the aborticultural report, coupled with an ongoing maintenance programme.

It was agreed to submit the comments on the above applications as drafted.

- **20/P/2990/OUT - Land to the west of Butts Batch, Wrington**
It was noted a briefing note on this application had been received from a resident. This had been circulated to Councillors for their consideration on 8 January. Cllr Taylor drew Councillors' attention to the amended draft comment he had circulated that afternoon. Councillors discussed the fact that the applicant is citing the approval of the Cox's Green development and, although Planning Inspector's decisions do not have the force of precedent, there was a risk that this argument could dominate the application. However Cllr Steinbach felt Cllr Taylor's analysis of CS32 emphasises the cumulative effect of successive planning proposals. Councillors also discussed that the site seems ecology sensitive for a range of protected species.

Returning to KWAU's presentation, Cllr Yamanaka explained that NSC cannot legally delay making a decision on any application pending the

completion of a Local or Neighbourhood Plan. It was also agreed to contact NSC and Cllr Steve Hogg on the future of the A5 bus service.

Finally, Cllr Taylor introduced an email, recently received from John Penrose MP, that suggests that the algorithmic housing figures have been thrown out and that the government has accepted that housing needs to be concentrated in cities and towns where there is employment. It is hoped this will strengthen the case against this application although reference is not made to this in the draft comment.

It was agreed to submit the comment as drafted. Councillors thanked Cllr Taylor for all his hard work on the application. The meeting also agreed to send a copy of the Council's comment to KWAU and also to Cllr Jan Murray of Churchill & Langford Parish Council.

[The comments submitted to North Somerset Council are attached at the end of these Minutes]

8 Other Planning Issues

- **North Somerset Council Enforcement Report**
This was noted.
- **Hinkley Point C Connection Project – Development Control Orders, formal submission to discharge requirements 20/P/3154/DCM and 20/P/3166/DCM**
These were noted.

The Meeting was closed at 7.00pm

Chairman

WRINGTON PARISH COUNCIL

Comments submitted to North Somerset Council following a Virtual Planning Committee Meeting on 12 January 2021

Application 20/P/2999/FUL - Land Off Winters Lane, Redhill

This Council notes that a previous application for similar proposals (application 14/P/2375/PDA) was judged as being permitted development and therefore not needing approval by North Somerset Council, but the works were not carried through by the applicant. There were no objections from this Council. The current application is put forward as a full planning application rather than the previous application pursuant to prior notification of agricultural development contained within Part 6 of the Town and Country Planning (General Permitted Development) Order, 1995, Class A. No reason is given for taking this route however.

The Council offered no objections to the 2014 application, but has noted the tone of the objections lodged against this Application by a neighbouring landowner, with indications that there may be ulterior motives beyond that expressed within the application now before the Council for decision. Any further development proposals for this site however must acknowledge that the area is washed over by Green Belt and therefore any future development will need to be the subject of a further planning application and will be so constrained. In planning terms however, this Council can see no reason to object to the current application.

Application 20/P/3011/FUH - Ashley House, Silver Street, Wrington, Bristol, BS40 5QE

This property sits within the Wrington Conservation Area and is subject to an Article 4 Direction relating to fenestrations and roof lights, dated 23 January 1995 (as amended). The proposal involves the loss of a designated garage to become a 'storage' area and garden room, though there is no perceived loss of available car parking on site as a result.

The changes to the prior existing timber doors to dark grey aluminium windows and the bi-fold doors replacing the existing fenestration, together with the addition of a roof light in the former garage area, are all to the rear of the property and will not be visible from Silver Street and only barely visible from Lawrence Road, to the property's rear, as the building abuts the boundary wall of neighbouring property.

In the circumstances therefore, this Council offers no objections to the works as specified, notwithstanding the extant Article 4 Direction.

Application 20/P/3014/FUH - Old School House, Church Road, Redhill, Bristol, BS40 5SG

The property sits within the Green Belt but not within any defined settlement boundary. The ash tree, which also forms part of this application, is covered by a Tree Preservation Order (TPO 580 dated 22 September 1988).

The proposed extension to the building creates no problems with overlooking or adversely impacting upon neighbouring property and appears to meet the criteria laid down in NSC's Residential Design Guidelines, RDG 1 and RDG 2. Equally the extension proposed does not exceed the guideline 50% increase in Gross Floor Area defined in Policy DM12 and is not therefore considered to be disproportionate. The design quality and appearance are also acceptable and to that aspect of the application, this Council offers no objection.

So far as the tree is concerned however, this Council is mindful of the amenity value of the tree which is reflected in the tree being subject to a TPO and notes that the tree is not diseased. This Council would prefer to retain that amenity value but would be content with a crown reduction of say 20% as suggested in the arboricultural report, coupled with an on-going programme of maintenance thereafter.

WRINGTON PARISH COUNCIL
APPLICATION 20/P/2990/OUT - LAND TO THE WEST OF BUTTS BATCH, WRINGTON.

This Council objects in the strongest possible terms to this outline application.

Prior to making detailed comments on the various aspects and documents submitted by the applicant to North Somerset Council (NSC) for approval of the proposed development, it is pertinent to draw attention to the events and developments which have shaped Wrington village since the 1980s in order to balance the inexact and unbalanced viewpoint put forward to support the application.

It should also be noted that Wrington Parish covers not only Wrington village, but to the north-east, the small village settlement of Redhill, together with many outlying hamlets and farms. It is therefore most inappropriate to compare increases in housing to the whole Parish when the developments set out below have all been accommodated within the south-west ward and predominantly within the village of Wrington proper. To utilise figures for the whole and wider Parish totally distorts the impact that developments have brought upon the village itself. To cite the only large development as being that recently approved at Cox's Green is to seriously understate the facts.

In response to North Somerset Council's Local Plan 2038 Consultation (July 2020) this Council wrote:-

"A large proportion of the Parish is over-washed with Green Belt.

Wrington is a well-defined, compact village with an identifiable centre around which the remaining shops are clustered. Since the 1980s there have been several housing developments in the village, viz;

- The Glebe – 64 houses which were designed to be sold at the lower end of the housing market;
- Home Close – 22 houses;
- Alburys – 25 houses;
- Yeomans Orchard – 19 houses;
- Garstons Orchard – 48 houses;
- Old Station Close – 11 houses;
- Rickyard Road – 17 houses (affordable housing as a rural exception site);
- The Lodge – 22 Retirement Apartments;
- Cambridge Court – 5 dwellings;
- Old Bell Court – 9 bungalows;
- Lawders Orchard – 11 houses originally for occupation by retirees;
- Numerous smaller, infill developments, some in existing properties' gardens.

The overall effect of these developments has been to increase the houses within the village by some 231, making the south-west ward of the parish in which Wrington village sits, consist of approximately 980 dwellings compared to a figure of approximately 670 in the 1980s. This equates to an increase in housing of approximately 46%.

Wrington village now has a new development totalling 59 (not 57 as put forward by the applicant) new houses which are currently under construction at Cox's Green, which has added a further increase of approximately 9%, taking a total of 1,039 dwellings, or an increase of 55% from the 1980s figure. "

With the proposed addition of a further 71 houses at Butts Batch (this Application) and a probable application for a further 35 houses to be built on land at the former industrial estate at Gatcombe

Farm, West Hay Road, the character of the village is in serious danger of becoming submerged under brick and concrete. This Application alone would seek to increase by some 60%, the number of dwellings compared to the 1980s figure. It cannot therefore be argued that Wrington village has not already taken its share of development to aid NSC in meeting its housing target in past years.

(The Gatcombe Farm site is currently a 'brownfield' site as it has for many years been used for commercial/industrial purposes, despite its setting within the Green Belt. Current government policy favours development on brownfield sites in preference to those on greenfield sites and it is understood that an application for housing on the Gatcombe Farm site will be lodged with North Somerset Council very shortly.)

Wrington is largely an agricultural, rural setting with very finite infrastructure facilities and there is clearly no appetite for losing its rurality, as the applicant's public survey responses unanimously indicate (see also further comments below). Employment facilities within the village are very limited, with the large majority of working age residents commuting to Bristol, Weston-super-Mare or elsewhere to work. The infrastructure supply is simply not there to enable further development to be accommodated or to do other than add to the current levels of pollution by car traffic necessary for residents to access their places of work. Ongoing pollution from Bristol Airport (which falls within Wrington Parish) activities, is also a factor to be considered alongside other, directly locally attributable vehicular traffic.

Access routes to the village are limited to narrow, often single width lanes and there is no direct bus service from Wrington village to other than neighbouring villages and the airport, and that very infrequently. A previous service to Weston-super-Mare which ran weekly, was withdrawn in May 2020 due to lack of use and, it is understood, the Airport Flyer service has been suspended.

It is admirable that the village primary school is so well regarded and operating at capacity, but it must be acknowledged that it currently accommodates pupils from outside its catchment area. If there is continued further demand upon its resources from within its catchment, then pupils from without will no longer be able to be accommodated and will have to find places elsewhere. Equally, 'local' pupils beyond 'reception' age (4years) who move into the catchment area may themselves be unable to be accommodated in their local school. The projected reduction in the appropriate demographic takes no account of increased attendance demand generated from new residents at this proposed development but also from the emerging Cox's Green houses, nor of the potential demand emanating from any development of the former Gatcombe Farm site referred to above. The provision of extra places to accommodate those developments would only kick the proverbial can down the road and foist the problem of accommodating young pupils at other sites to neighbouring schools.

NSC has declared a climate emergency and has set out its target to be carbon neutral by 2030. This will impact heavily upon the reduction of carbon and other pollutants in order to meet the target set. Whilst this Council acknowledges the intent to increase biodiversity at the Butts Batch site, the building of 71 further houses will itself increase pollution levels (a) during the construction works – and in two phases – and (b) post construction by the incoming residents themselves, their fuel use, and their vehicular movements, however minimal the developers project these to be.

Wrington is designated as a 'Service Village' in NSC's hierarchy of terms and development within that category is governed by North Somerset Council's Core Strategy Policy CS32. That policy demands that *"New development within or adjoining the settlement boundaries of the Service Villages which embraces the overall sustainability of the settlement will be supported where.."* seven criteria are met. The proposed development site abuts, but is not within, the settlement boundary of Wrington village.

The criteria to be met are:-

- *It results in a form, design and scale of development which is high quality, respects and enhances the local character, contributes to place making and the reinforcement of local distinctiveness, and can be readily assimilated into the village.*

This Council is of the opinion that this application fails to meet this criterion in so far as there is no proposal which defines the quality or appropriateness of the design build on the site, there is no reinforcement of local distinctiveness and whether it can be readily assimilated into the village is very much open to challenge, not least due to the statistical and much other data which has been commissioned by the developer, for the developer. It has not been robustly challenged and the underlying data from which it is produced remains unverified.

- *It has regard to the size, type, tenure and range of housing that is required.*

No evidence has been put forward to suggest that the developer's proposals go any way to meet local village needs for housing, despite their apparently altruistic gesture towards meeting NSC's under-provision in achieving its imposed housing target. It is also appropriate to state that permissions granted by North Somerset Council substantially exceed the figure of completed housing developments with this situation stemming from developers' reluctance (or inability) to fulfil permissions in a timely manner. The effect is to exaggerate the true housing deficit within North Somerset. This Council also draws attention to NSC's emerging policy document 'Choices for the Future' which defines NSC's proposed spatial strategy for the coming years and which is referred to later in this document.

- *It will not cause significant adverse impacts on services and infrastructure and the local infrastructure is sufficient to accommodate the demands of the development.*

This criterion is very much subjective, but the statistical and other data put forward by the developer in this regard remains unchallenged. Supplementary documents such as the Transport Assessment (see also later in this document) indicate public transport routes which are non-existent or are economical with the truth regarding the frequency and efficacy of the sole route which remains to serve the village and which is under threat of closure. Employment opportunities and services put forward to justify development approval are also fanciful and inaccurate, referring to employment sites which no longer exist and nursery school facilities which have never existed in the village.

- *It results in high quality, sustainable schemes which is appropriate to its context and makes a positive contribution to the local environment and landscape setting.*

This Council fails to comprehend how such a significantly sized development on the edge of the village, on a green field site could be described as 'appropriate' or how it could make a 'positive contribution to the local environment and landscape setting'. It may be that, following the complete (ie both planned phases) of the development there could be achieved a net positive increase in biodiversity along a small patch of land which itself is subject to (at least annual) flooding under Flood Zone 3, despite the regular flooding of the ground often in excess of 1m depth. Against this however, must be weighed the effect of the loss of pleasant green field amenity which has been in place since at least the 19th Century undisturbed. Effects on wildlife will be dealt with later in this document.

- *It does not result in significant adverse cumulative impacts (such as highway impacts) likely to arise from existing and proposed development within the wider area.*

Throughout the proposals, impacts such as highway impacts have been considered solely in respect of this proposed development. At no time however, has the broader picture been taken into account, such as the forthcoming impact produced by the occupation of the 59 houses already being built at Cox's Green. Put the two together and the cumulative effect will be substantially greater than that considered for this proposal. Add to that the fact that all the roads into Wrington are narrow, country lanes, often with places where two vehicles struggle to pass one another, and any increase in traffic is bound to have an adverse effect. Those access roads are often without pavements alongside the highway, thus compromising safety for both pedestrians and cyclists. As the majority of the working population commutes out of the village to work, added pressure will impact upon roads to Bristol and Weston-super-Mare as car transport is the only practical means of travel to those sites, or to Yatton if the transport mode is by rail. It is already acknowledged by NSC that both the A370 and A38 roads are in need of upgrading to meet existing shortfalls in capacity. Given the increase in vehicular traffic (and before considering the immediate impact of construction traffic and its accessing the site), it is impossible not to see an increase in pollutants which will erode the effectiveness of NSC's efforts to achieve its carbon neutrality target.

- *The location of development maximises opportunities to reduce the need to travel and encourages active travel modes and public transport*

For the reasons set out in the preceding paragraph, the application fails in this respect. Walking to Bristol or Weston-super-Mare is utterly impractical, cycling is not without its hazards and the use of public transport is impractical with the very limited service provision available and opportunities for employment within the village (ie within walking distance) are very small, and continuing to decline since the Cox's Green development was approved. The Gatcombe Farm Industrial Estate has ceased to be an employment area and the manufacturing company P.J. Hare Ltd. has been closed down, with further employment opportunities seriously reduced (See also later in this document). The working population is therefore left with no choice if working outside the village, but to use pollution generating means to get to work.

- *It demonstrates safe and attractive pedestrian routes to facilities within the settlement within reasonable walking distance.*

Whilst the outline site plans put forward go some way to meet this criterion, this Council would emphasise that any references to a pedestrian access to/from the north of the site, via Westward Close must be regarded as purely speculative and aspirational. This Council has no knowledge of any negotiations by the developer which have resulted or will result in the opening of a pedestrian throughway as proposed on the plans. In the light of that, any reference to a 'Strawberry Line Cycleway' along the disused railway track running east/west from the site's north boundary must also be similarly regarded. Notwithstanding the above, walking distance to the village centre should be considered as 'reasonable' for the average person.

- *Sites outside the settlement boundaries in excess of 25 dwellings must be brought forward as allocations through Local Plans or Neighbourhood Plans.*

This site is outside the settlement boundary and is greater than the 25 dwellings referred to above. The site has not been brought forward in NSC's current Spatial Plan, adopted 2018 (in fact it was considered at an early stage but not adopted in the final document) and nor is it put forward within any Neighbourhood Plan. The village is currently proceeding with the aim of completing adoption of a Neighbourhood Plan. The proposal to develop this site must therefore be considered as without foundation and purely speculative and failing to meet the fundamental criteria set out in Policy CS32.

This policy goes on to state (Paragraph 4.85) *“This Council will not support proposals which either on their own or in aggregate cause significant adverse impacts on the character or the functioning of the village”* It goes on to state (Paragraph 4.88), *“In assessing the suitability of development proposals the Council will assess the economic, social and environmental dimensions. The policy will apply within the defined Service Villages. Identifying opportunities to enhance the role and function of these places will benefit from close working between developers and landowners, the council, local communities and other partners. Developers are encouraged to engage with local community before drawing up their schemes.”*

In terms of economic, social and environmental dimensions, this development offers little other than to create more pressure on social services such as schools, dentist (not NHS) and medical facilities, loss of green field site of visual amenity value to residents to ‘development’ by building 71 more houses, with consequent ongoing disruption when done in two phases, with the only economic benefit being the potential to support local village shops when the development is occupied.

It is also of interest to note that of over 1,100 letters which the developer claims to have distributed to village addresses, only some 11% responded and all but one of those responses were opposed to the development. It is unclear also whether the addresses to which the flyers were distributed were all within Wrington village or whether they included the greater area of Wrington Parish. Also worth bearing in mind is that, during the (extended) consultation period, Covid-19 restrictions prevented any public meeting being held, which would normally have been expected and the so-called ‘consultation’ with the Parish Council was in fact simply a short presentation of the proposals, basically re-iterating what was already available on the website. Incidentally, the website address was incomplete on the flyer sent to village residents and anecdotal evidence indicates that flyers were sent to houses as yet unbuilt on the Cox’s Green site referred to above. The response cannot realistically be accepted as a meaningful consultation or engagement with the local community, such as set out in CS32. It would however appear that the developer’s letters to residents did generate a wealth of objections!

Paragraph 4.89 of that policy also states *“..the cumulative impact of development will be a significant consideration and a succession of piecemeal developments which individually or taken together have an adverse effect on any individual village are unlikely to be supported.”*

This Council would contend that this application should fail on those grounds alone. It must be borne in mind that although permission is currently sought for 71 houses (albeit to be built in two phases), the developer only has a ‘contract of sale’ over the proposed site, which also incorporates the remainder of the land to the current field boundary hedge west of the proposed development site, the title remaining currently in the name of the farmer and the family’s pension trust, not to mention further land alongside West Hay Road, where, it is presumed, a similar arrangement is in place. It is North Somerset Council’s policy relating to pre-application consultations with developers, that all sites owned by the developer in the vicinity of the proposed development site, be declared at the pre-application consultation. No evidence has been produced to confirm this requirement has been met. The sole aim of purchasing such a large acreage of green field land must be to ‘develop’ the site yet further once the 71 houses are completed (or even beforehand) adding yet further to what is already an unwanted and purely speculative proposal. It does not require a great deal of brain power to reach the conclusion that this application is the thin end of a wedge to produce *“a succession of piecemeal developments”* on this site, which would most certainly have a most adverse effect upon the village and its current rurality.

National policy supports a sustainable approach to development in the rural areas, with emphasis on supporting services, employment and facilities in smaller towns and larger villages. Once again, this proposal fails to fit with that approach.

DESIGN AND ACCESS STATEMENT

The Design and Access Statement designed to promote and to summarise the development proposed, is subject to many inaccuracies, incorrect statements and dubious conclusions designed to favour the concept of development on this site, as one would expect. With many statements claiming to be fact which are plainly fiction, the quality of this presentation calls into question the accuracy and reliability of any data used to support the case for development, and, this Council would also add, much of the data so presented remains unchallenged and unverified by any independent source. It has been prepared at the request of the developer, for use by the developer and is therefore slanted towards favouring the developer's intentions and aspirations. This Council would therefore expect the Local Planning Authority to examine with utmost care, the efficacy and veracity of the information put forward in support and to seek an independent assessment be undertaken on its behalf.

Executive Summary

Paragraph 5

"The site's proximity to a range of local facilities, public transport routes and the village centre, contributes greatly to improving the long term sustainability of the development proposal."

There is currently a reasonable range of facilities within the village, but less than when the local council set out its 'RAG' review of facilities available in NSC's Service Villages.

Only four buses visit the village in each direction on a daily basis, using Route A5, with no service whatever on Sundays. The route runs from Winford to Winscombe (and conversely) via Wrington and Bristol airport. Passengers wishing to travel to Bristol need to change at the airport for a further service, whilst those travelling to Weston-super-Mare would normally change to the airport flyer service (currently suspended) but now need to change in Winscombe to join an onward service. The first bus from Wrington to the airport leaves Wrington at 09.42hrs; the first bus to Winscombe leaves at 08.13hrs. This is much under-used for reasons which would appear to be obvious. As a result, it cannot be claimed that this nominal public transport service can be considered as contributing anything to the long term sustainability of the village.

Overall, it is difficult to substantiate this ambitious claim for the proposed development to be an improvement to long term sustainability from this statement or any supporting data.

Section 1.1 – The Purpose of the Document

On page 6, the list of sections includes 'Section 4 – The Climate Change Emergency' and goes on to describe the applicant's acknowledgement and approach to the climate emergency in one succinct sentence. The Contents page also lists this section. However, the section is totally absent from the document under Section 4 which actually contains the Design Proposal. The document fails even to mention the climate emergency other than in these indices. This is a shoddy and unacceptable omission.

Paragraph 1.2

The village is situated west of the A38, not north of it! (Ref Ordnance Survey).

Section 1.3 – Planning Context

Although, quite rightly, the document refers to the criteria set out in Core Strategy Policy CS32 of North Somerset Council's Core Strategy, its interpretation is considered to be 'liberal' at least, and all arguments are set out in favour of the proposed developer. This Council is of the opinion that, notwithstanding the case put forward in this Section of the Design and Access Statement, the development should fail as the criteria demanded have not been met. (See a more detailed response to CS32 on pages 2 to 5 above.)

As demonstrated on page 1 of this document, to cite Cox's Green development in the manner put forward, paints a totally slanted picture, once again (mis)leading the reader into believing that Wrington has enjoyed some immunity from development in recent years, when it is clear that it has not. The propensity to lean towards the Appeal Decision relating to the Cox's Green development runs throughout this Application, whereas that Decision should not be relied upon as support for this new proposal.

Further, the text goes on to state;- *"This wider context further reduces the weight that should be afforded to adopted policies. North Somerset are in the early stages of drafting a new local plan to address this"* Whilst NSC is indeed in the throes of preparing an updated plan, the existing policies remain in place and cannot be ignored. The paragraph commencing *"Taking account of this background..."* makes no sense as written. *"Constrained"* indicates a degree of constraint, whereas this is inappropriate in this context. A simple surveillance of the map attached explains its situation adequately without use of misleading or emotive language

Development Location and Site Assessment

2.1 Southern Boundary

The sentence *"..visually defining the settlement edge when viewed from afar"* is misleading and implies that the 'settlement' is bounded by the River Yeo. The Village Settlement Boundary lies further to the north, abutting the area proposed for this development.

2.2 Site Topography

The so-called map of the site's topography is meaningless without a reference to contour heights. As submitted it is misleading as it fails to indicate the height achieved by the ridge shown on the map. (See later for more detailed analysis.)

2.3 Local Character

References to "built form" may be appropriate in an urban context, but this is a village with a character of its own, not just another 'estate'. The document fails to acknowledge that the majority of buildings to the east of the site are two-storey whereas on Westward Close (north east of the site) and Wiltons (north of the site) are either bungalows (1 storey) or chalet style (1.5 storeys) which will be seriously impacted by being overviewed from the north of the development site. This assessment is seriously skewed by the developer in order to present a more acceptable view of the proposals.

Open Spaces

References to 'Wrington Sports and Social Club' are misleading. The Club merely operates and hires from the Parish Council, the pavilion situated on the Recreation Ground to the east of the village. It does not promote sports in its own right, but merely 'manages' the pavilion, its changing facilities for use by field sports such as football and cricket. The Recreation Ground is the property of the Parish Council which is accountable for its maintenance. There are tennis courts and play equipment for use by young people. As written, this paragraph misleads the reader and demonstrates a lack of understanding of the village.

The second paragraph under the sub-heading 'Post War' makes no sense and is totally meaningless. It serves to add nothing to the developer's case.

Page 15, Paragraph 5.

This statement is simply wrong and creates an incorrect and misleading impression of past village development. The use of photographic imagery to represent aspects of the village is, once again, heavily weighted towards making the development appear to complement the village, whereas the positions chosen from which to take photographs are not properly representative of the truth, as a walk around the area will easily demonstrate.

2.4 Local Facilities

From the list of 'facilities' provided on page 20 of this document, the following elementary errors should be disregarded:-

The Rainbow Montessori Nursery School is located in Winscombe, not Wrington.

Wrington Vale Medical Practice is in Churchill, not Wrington. (It is actually 'Mendip' VMP)

Wrington Dental Centre is private patients only – no NHS work is undertaken.

Wrington Sports and Social Club is not a facility per se – see preceding comments above.

The associated map also highlights bus stops within the area, but unfortunately it has failed to recognise that several of the bus stops are no longer served by a bus! The whole of this section is, once again directing the reader to a misleading and often incorrect conclusion as to the proposed development's acceptability in planning terms.

2.5 Connections and Movement

Once again, the second paragraph refers the reader to 'employment opportunities' but there are very few such within the village, and those are also declining, resulting in those of working age having to seek employment outside the village, with that in turn adding to commuting traffic predominantly by private car, due to lack of public transport infrastructure. It also refers to 'a number of pubs' which is only true if 'a number' is two.

It goes on to refer to 'bus stops further north along Butts Batch' but, as stated earlier, bus stops are no good without an adequate bus service, and there is none. Furthermore, it is believed that the current minimal service is under threat of withdrawal due to insufficient usage.

Overall this assessment has failed to demonstrate 'no material effect on highway operation'.

2.6 Arboriculture

The Quality Assessment ignores the potential for foraging by bats, which are known to forage in this field, its hedgerows and along the river Yeo and the whole site falls to be considered as protected under the North Somerset and Mendip Bats Special Area of Conservation Supplementary Planning Document adopted by North Somerset Council in January 2018. Also failing to be considered is the

disruption to bats foraging caused by construction traffic, lighting and the removal/translocation of hedgerows. Any replacement or supplementary hedgerows will take several years before they are able to attract insects to provide food for foraging bats and therefore before there is any net positive contribution to biodiversity or ecology.

2.7 Ecology and Nature Conservation

Notwithstanding the comments made in this section, this Council remains unconvinced that a net gain will be produced. It is inevitable that existing habitat will be lost and disturbed by building operations and light pollution – the latter both during construction (2 phases ongoing remember!) and later by occupation of the houses. The Bats' Special Area of Conservation referred to above is critical in preserving any foraging area, despite the assessment stating that the site is not an important foraging area for bats. Dormice are also a protected species, not to mention badgers and hedgehogs which are now under serious threat as their numbers have plummeted over recent years. This Council does not accept that provision of hedgerows as part of the development is going to provide adequate protection to the species, and particularly so during the construction phase(s). It is imperative that adequate steps are taken to ensure protection is assured, preferably under close supervision of an independent, suitably qualified professional, appointed by NSC, prior to any work commencing on this site.

2.8 Landscape and Visual Appraisal

The final sentence of the second paragraph under the heading of "Landscape Assessment" states that the site's western and southern boundaries are open to retained agricultural land" but once again fails to acknowledge that the developer has actually contracted to own a large area of the field within the most easterly part of which the development site fits. The only reason to retain that acreage is for it to be 'developed' for housing at a later date. It may be that the said area will continue to be used for grazing for the time being, but once again, the statement as written would appear to be economical with the truth and designed to conceal the ultimate intentions. (See also comments on pp5/6 above.)

Further, the section acknowledges the 'High' designation attributed to the area by NSC's Landscape Sensitivity Assessment (2008), owing to its "open, visually prominent nature, its location outside of the development form" and the "lack of landscape features which could potentially limit development sprawl." It is therefore obvious that NSC's Assessment attributes a high value to the unhindered status which contributes to the village amenity value. Any development must therefore have an adverse and damaging effect on that amenity value.

The Visual Assessment is, again, very selective in its use of data and provides only information which contributes positively to the developer's case. A closer, more comprehensive database would reach a different conclusion to that drawn in this section and therefore this Council is drawn to the contrary opinion that the conclusions as submitted by the developer remain unsubstantiated by an independent third party. At the end of the day, this is still 'development' in seeking to build on a greenfield agricultural site.

3.1 Public Engagement

Page 5 of this document sets out the facts relating to public engagement relating to this proposed development. It is however also pertinent to draw attention to the questionnaire which respondents were asked to complete on-line. Responses were sought to a series of 'options' which were presented on the developer's behalf and which, by the very nature of the questionnaire, assumed that planning permission would be granted. This approach may be the catalyst which

provoked 127 out of 128 respondents to object to the development *per se* and for the response overall to be poor (only approx. 11%) and for the ‘need’ for the timescale for responses to be extended three times in order for the ‘consultation’ to be regarded as being meaningful.

Incidentally, there was never any ‘scheduled’ Parish Council Meeting in August 2020 – the Council never meets during the month of August in any year due to its being a holiday period. A study of the published schedule of Parish Council Meetings would have indicated this.

3.2 Statement of Community Involvement

The specific commentary received from the public who made such in their response to the ‘public engagement’ is uncharacteristically limited, but, given the nature of the options provided within the questionnaire, is not surprising. There would appear to be a strong possibility that there has been widespread misunderstanding of the underlying points here.

3.3 Design Evolution

It would appear that the area of biodiversity net gain will involve the destruction of existing biodiversity largely by the construction phases(s) of this development. If Phase 1 is completed and the green strip to the south subjected to increased biodiversity, then Phase 2 is bound to impact adversely upon that area as the same means of access to the site will be in use, with consequent disturbance of the biodiversity on site, not to mention the impact of new residents upon the site.

With respect to the provision of a local play area for younger children, what equipment is it proposed will be installed and what arrangements made for its maintenance and regular safety inspection? This provision, unless robustly managed could be an ‘albatross’ around the necks of new residents for years in the future. There is also mention of a ‘toddler play space’ hand in hand with a ‘village pond’. The two concepts would not appear to be complementary and it is suggested that there has been insufficient attention given to this aspirational aspect.

The Illustrative Master Plan, paragraph 2 refers to “the creation of a unique character to the development.” This development is as far from being unique as is possible, and in reality is a proposal for yet another ‘urbanisation’ or ‘road with houses either side mid-estate’.

Design Proposal

4.1 Vision and Objectives

This Council does not believe that the proposal as submitted goes anywhere close to meeting the objectives set out in this Section and is minded that much of the data used to inform the proposals has not been independently verified, is economical with the truth and is designed deliberately to mislead the reader due to the selectivity of the data used to support it.

The use of phrases such as ‘public realm’, ‘sense of place’ are in themselves valueless and unsupported. The claim in inset 2, (under the sub-heading ‘Urban Design Objectives’) that “The design will encourage all pedestrian movement and activities within the site” is at best ambiguous and at worst, wrong. The primacy of the spine road favours cars over active transport.

The statement that “Public Open Spaces cover a significant proportion of the application site” is purely subjective to one’s understanding of the word ‘substantial’. What is “Natural Surveillance”? It implies a lack of privacy perhaps. “Well-lit routes” is contrary to lighting levels required within foraging areas used by (particularly) Greater and Lesser Horseshoe Bats as set out in the NSC Supplementary Planning Document referred to previously. (The ongoing development at Cox’s Green is also sited within the same zone as Butts Batch and it has been a condition that no street lighting will be integrated into the development in order to minimise intrusive light pollution to bats foraging.)

The phrase used “providing a harmonised and enhanced character” may be an aspiration, but the proposals put forward do nothing to achieve that. The character of the village will be adversely impacted by the development of this prominent site which will be clearly visible from the south and west of the village, the open, agricultural aspect seen from public footpaths traversing Wrington Hill to the north and from the Mendip Hills AONB several kilometres to the south. In short, this development fails completely to meet its own aspirations and the policies in place within North Somerset Council’s Core Strategy. It is not possible to hide a 2 storey building behind a field hedge on rising ground, let alone a large development of this magnitude.

To contend that “..the proposed development will complement the scale of existing buildings and character of the village” is totally without foundation, lacking independent scrutiny and unsupportable in this Council’s view, for all the reasons set out above. It does nothing to protect the rurality and existing character of the village, but rather seeks to urbanise what is a characterful village community whilst alleging it is providing sustainability to the village and its community.

To claim that the site forms a welcoming ‘green gateway’ into the village is frankly absurd and totally without foundation. There is already a ‘green gateway’ provided by open agricultural fields. Any impact upon that view would be totally negative when presented with a scene of buildings of up to 2 storeys sited on a south facing hillside in full view of incoming traffic from the south.

It goes on to refer to ‘scrapes’ reflecting historic water meadows, but there is no firm substantiated evidence that such ever existed, other than when a large proportion of the south of the site floods under certain conditions (Zone 3).

The “considerable area of open space” is actually quite narrow and not compatible with the statement of intent. The enhanced hedgerow provision is welcomed, but it must be recognised that it will take several years before new hedgerows are able to provide any gain to ecology or biodiversity targets.

4.4 Parameter – Access

It is acknowledged that access to the site is only feasible via Butts Batch as proposed, but to be effective, it will be necessary to install a pavement/footway for pedestrian access to the village in a northerly direction, where at present, there are green grassed verges with their attendant biodiversity. Much of this biodiversity will be lost, but this does not appear to have been factored in to the plans. Equally, there has been no independent verification of the visibility splay data used to inform the planned access point and taking in to account the need for heavy machinery to reach the site.

4.5 Parameter – Street Hierarchy & Movement

Nowhere else in the village have private or gated areas of estate developments been permitted and this proposal would be unacceptable in this context. They can only promote counter-inclusivity. The pedestrian access shown on the map remains purely aspirational as there is no pedestrian access from the north of the site, nor are there any proposals to open such an access at this time.

4.6 Parameter – Land Use

The area shown on the chart for ‘Ecological Mitigation’ (1.36 ha) and the ‘retained land to partly accommodate below ground drainage level’ (0.45ha) all fall within Flood Zone 3, as are areas to the north of the site, which could, if flooding occurs, leave the site surrounded by water and isolated from access by vehicle or on foot. (see also Drainage comments later.)

4.8 Parameter – Building Heights

What on earth does the second paragraph mean? It is a magnificent example of mumbo-jumbo English which carries no meaning whatsoever. The third paragraph refers to an 'organic manner' but fails to define what that actually means. The whole section is nothing if not meaningless.

It does however fail to acknowledge that houses built on the ridge identified within the earlier topographic chart and further described in the Landscape and Visual Impact Assessment, Section 11, page 17, would have ridge and eaves levels substantially higher above the ground level than those built on the lower southern slopes and would therefore be far more impactful on the eye and overlook any properties built on the south, as well as the north facing slope towards the northern boundary and potentially those houses already existing on Westward Close, Brooklyn and Wiltons. That section identifies the highest part of the ridge at 21m AOD with the lowest points standing at 16m AOD and 12m AOD at its southern edge. This is misleading in the extreme as an average 2-storey dwelling would have a height of approximately 9m.

4.9 Parameter – Open Space, Adoption & Ecology

The western open space is planned to be provided for equipped and informal play, but it is not taking into account by whom it will be maintained, checked and tested for health and safety as required and insured in case of accident/public liability. This is not a Parish Council facility and responsibility for the above appears not to have been fully considered. (See also page 18 below)

The final paragraph refers yet again to "the future Strawberry Line cycleway extension to the north" but it must be remembered that this is only aspirational and, to the best of this Council's knowledge, there are no plans afoot to take this forward at this stage.

The plan indicates an area of 'private adoption/management' but what precisely does this mean? Is it developer jargon for 'private garden' or 'open plan garden' or what? In its present format, it remains undefined.

The final bullet point of this section seeks to provide native meadow, tussocky grassland, shallow scrapes, habitat woodpiles, mown paths etc. in the southern open space, but omits to state that the area sits within Flood Zone 3 and therefore subject to periodic inundation, which will impact upon biodiversity and do no good to woodpiles let alone seating opportunities.

The 'Ecological Mitigation' proposed recognises the importance of hedgerows as used by dormice, bats, birds and badgers, but not that they will all be badly disturbed during any construction works. Any loss of habitat will take time (sometimes many years) to reconstitute and protection at all times is imperative. The likelihood of wildlife being able to continue to use such habitat during construction is zero. In addition, there needs to be no overnight lighting in order to minimise wildlife disruption and also to minimise impact upon neighbouring residents. The claim made that the grassland in existence is 'ecologically poor' needs to be independently substantiated to be acceptable, but no independent data has been provided to enable this to be proven. On the face of it, given the preceding paragraph, and previous claims that dormice, bats, birds and badgers are present, the two statements appear to be contradictory.

There is no evidential data to support the claims for net increase in biodiversity, which should be challenged independently. Any disturbance to hedgerows, particularly in this bat sensitive area, will impact upon wildlife, but nevertheless, it is claimed that a net gain in biodiversity will be achieved. As it stands, this claim cannot be accepted. To offer to provide bat, bird and insect boxes on site is welcomed, but is in effect nought but a token gesture towards the local ecology and biodiversity. The on-going maintenance and protection/replacement of such items has not been considered as part of the equation.

It should also be noted that the river Yeo and its immediate surrounding area is designated as a Site of Nature Conservation Interest (SNCI) and is protected as such. Any proposals for works to be undertaken within that area will require specific planning permission in order to protect the ecology and wildlife which uses or lives in that zone. (Otters, kingfishers and sundry fish have been recorded in or foraging/hunting around the river.)

4.11 Flood Risk Assessment and Drainage Strategy

Surface Water Drainage

The proposal to drain some of the surface water to the south via an existing system to the watercourse (presumably the river Yeo) would add substantially to the volumes drained via that source at present, due to the fact that absorbent grassland will be replaced by impermeable concrete and similar surfaces. This Council notes in Section 4.12 – Drainage and Water, that ‘potential permeable paving may be used in some areas subject to ground conditions’. This may not be adequate and is easily avoided by the developer. It should be a mandatory requirement. Although it is claimed that Wessex Water has stated that its current infrastructure can cope with drainage from the site, this should be independently verified, particularly in the light of increasing levels of precipitation due to climate change and any potential to upset the conservation of nature protected by its status as an SNCI by increasing the input to the river via manhole S24. Comments within the Drainage Strategy document appear to dispute this statement (see page 15/16 below).

4.12 Sustainability

Layout

‘The layout will provide a well-planned, high quality development with a distinctive character and sense of place...that has developed from a clear understanding of the surrounding local area and wider context.’ This statement is contradictory. In other sections of this document, it is claimed the development will be complementary to the existing village vernacular, whereas in this paragraph it is stating that the development will have its own distinctive character. Such is unacceptable as it would set the development apart from the village vernacular and inhibit its integration into the existing surroundings. It would be unacceptable for any development to set itself apart or to create an alternative context if the character of the village and its rurality is to be protected and enhanced. It is clear from this statement that the developer considers this proposal as just another urban development and is unconcerned that it will impact unfavourably upon the existing. Homework should have been done properly prior to this application being submitted.

Maximising solar gain should be mandatory and all new builds should be provided with appropriate means of accessing solar power by, for instance, photo-voltaic panels on the roofs. This proposal however singularly fails to do this in that the large majority of the roof pitches are east/west, which are the least suitable for PV systems. In addition, this orientation will greatly increase the risk of summer overheating, which will only get worse with rising summer temperatures due to climate change.

Claiming to provide ‘a range of homes and tenures that respond to local needs’ assumes that local needs have been assessed. How have the local needs been assessed, because this Council is unaware of any consultation on this aspect having taken place within the village? This is another example of a lack of communication and consultation by the developer.

The lack of any consideration of the climate emergency anywhere in this document, or of any other discussion about the energy and emissions targets for the dwellings suggests that these have either not been considered or that the developer (or author of this Design and Access Statement) has no understanding of their importance.

Ecology

No consideration appears to have been given to the future maintenance or replacement of the proposed 'educational boards'. Their provision carries no weight in terms of acceptability of the development.

Layout of roads and footpaths

Bullet Point 5 refers to the provision of street lighting, but appears to ignore the constraints upon lighting set out in the North Somerset and Mendip Bats Special Area of Conservation Supplementary Planning Document adopted by North Somerset Council in January 2018. Conditions preventing street lighting (and external lighting to properties on site) were imposed on the Cox's Green development and similar restrictions should be imposed upon this proposal if approved. In view of this oversight, a further crime assessment should be undertaken.

Planting in new developments

What does 'designed to ensure proper maintenance' mean? This is unclear as to what and by whom and why? Equally, there is reference to not obscuring lighting, but as mentioned above, there should be no street lighting or outside lighting on site.

4.13 Illustrative Phasing

The proposal sets out development in two phases; the first phase to develop the south and part of the east of the site. However, the development of the subsequent phase two would mean continuing disruption to those residents now occupying phase one whilst the remainder of the site is being constructed. Such a proposal may also be used by the developer to 'delay' the secondary construction to suit its own convenience or need. Such action would be contrary to the claimed need to meet urgent housing shortfalls within North Somerset. In addition, the provision of open spaces and wildlife areas will be subjected to ongoing disruption to both established and any 'new' wildlife looking to establish itself. This scheme has not been properly thought through and should provide grounds for it to be rejected.

Appearance***5.1 Influence and Acknowledgement.***

It has already been shown above (Section 4.12) that the opening statement of this section is simply untrue and ill-conceived as well as unsubstantiated. It serves only to indicate a total lack of comprehension of the rural village vernacular. The 'illustrative street' shown at Section 5.2 is totally out of character and of use solely in an urban context, but not in this village.

To claim that, although appearance is to be a Reserved Matter, it will be influenced by the existing village vernacular, is completely at odds with what is being presented and once again, serves to indicate a total lack of understanding of both the village, its vernacular and its rural setting.

6.1 Conclusion

The final paragraph states "This scheme offers an exciting new development for Wrington that is sustainable, well-integrated and a natural organic extension to the village and its surrounding environment."

This Council cannot accept that the proposal is exciting, sustainable, well-integrated or a natural organic extension to the village or its environment. It seeks to destroy existing greenfield sites which are an integral part of the rurality of the village and of valuable visual amenity and replace them with unsightly, urban design, inappropriate boxes. It makes claims of sustainability (eg public transport) which are patently over-exaggerated and plainly inaccurate. It sets out facilities claimed to be within the village which are not there and generally endeavours to lead the reader to form the opinion that the development actually contributes to and complements the existing village, which it plainly will not do.

FLOOD RISK ASSESSMENT AND DRAINAGE STRATEGY

This Council is concerned that the data provided to inform this Report appears to be unchallenged or independently assessed. In view of similar concerns expressed in relation to the Design and Access Statement dealt with previously. By way of example;

§1.5 claims that access to the site is via Westward Close. There is no such access. This error is repeated in §3.29.

§3.6 refers to incidents of historic flooding, but is only selective in its information. There have been many more incidents of flooding in years other than those which have been highlighted. In addition there were four flooding incidents in 2012 alone.

§4.7 states that “Consultation with Wessex Water is still ongoing to confirm that there is adequate capacity within the existing surface water network to serve the proposed development and the proposed discharge rates.” The Design and Access Statement, Section 4.11 (see above, page 13) gives the impression that Wessex Water has already agreed that the proposal is within the current capacity. The critical question is ‘who is correct?’ Clearly there would appear to be a difference in understanding between the left and right hand here, which makes it critical that the findings must be subject to independent scrutiny to reach the truth. §4.12 makes a similar statement relating to the treatment of foul network capacity.

Once again, we find §5.9 referring to a site access from Westward Close which does not exist, all of which continues to cast doubt upon the reliability of the evidence provided on the developer’s behalf.

ARCHAEOLOGICAL DESK-BASED ASSESSMENT

The fact that this desk-based assessment suggests there is no archaeology on the site, no ground survey appears to have taken place to verify the desk-based information. The fact that, to date, nothing has been found on the site does not mean that there is no archaeology yet to be found. A proper ground survey needs to be undertaken to eliminate any possibility, but with the local area known as ‘Butts Batch’ indicating its use in earlier times as a practice area for bowmen to hone their skills, one would expect to find some archaeology around the site. To undertake solely a desk-based report is an abdication of responsibility.

LANDSCAPE AND VISUAL IMPACT ASSESSMENT

2.0 Planning Policy

Among the Supplementary Planning Documents cited in this Section, the North Somerset and Mendip Bats Supplementary Planning Document adopted in January 2018 appears to have been overlooked, with the result that several of the proposals put forward (eg street lighting) and

highlighted above within the Design and Access Statement contravene or work against the document. This is a profound, if elementary oversight.

The chart displayed alongside the paragraphs entitled ‘Settlement Pattern’ and ‘Landform and drainage’ demonstrate very clearly that there will be a substantial impact upon visual amenity by the proposal and result in overlooking houses built at lower elevations within the site, not to mention the properties already directly adjacent to the site (see comments made under Section 4.8 of the Design and Access Statement above, page 12).

8.3 Construction Phase

It has been acknowledged that access to the village via Halfyard and Lower Langford is by a narrow country lane, barely wide enough for two cars to pass, and therefore construction traffic will have a huge impact upon that resource. Access via the village itself must be prohibited on safety grounds due to lack of safe pedestrian footways in places, presence of many off-street parked vehicles (on Station Road and within other parts of the village) and use by parents taking young children to school at the village primary school. The impact of construction traffic alone will be substantial, if this development is permitted, not only on Wrington and its access roads, but also on the neighbouring communities of Lower Langford and Churchill through which construction traffic must pass.

8.4 Operational Phase

This paragraph yet again refers to levels of site lighting with no accounting for the constraints imposed by the ‘Bats’ SPD omitted from Section 2.0 (see above).

References to the scale and treatment of new buildings within Section 8.5 have already been discredited within the response to Section 5 of the Design and Access Statement above.

10. Landscape Sensitivity and Effects

Section 10.3 defines Cleeve Ridge (to the north of the village) as ‘medium value’, but this Council is of the opinion that Cleeve Ridge is much valued as a recreational area with high quality views across the village from the many PRoWs crossing the area. Views are far from being ‘fortuitous glimpses’ as this section describes. Section 10.4 refers to the landscape sensitivity of the site from Mendip AONB as being of medium/high value, yet within the same paragraph, it is stated that the “Mendip Hills AONB is of high value due to its special qualities”. This is nonsensical.

Section 10.5 quotes from NSC’s Landscape Sensitivity Assessment, 2018, *“To the west of the village the land is open, visually prominent and located outside of the development form, and there are no landscape features which could potentially limit development sprawl. Owing to this, this land is of high sensitivity”* and under section 10.2 *“The sensitivity of the wider LCA J2: River Yeo Rolling Valley Farmland, in which the site is contained, is considered to be Medium. The landscape is comprised of settled farmland with undulating topography, partly compromised by roads and built development.”*

Sections 10.6 and 10.7 of the Landscape Assessment go on to argue that, despite Section 10.5 above, the site is right for development and its impact will be negligible. This is an unsustainable argument given the facts and ignoring the distortion of them in favour of the developer.

11. Visual Sensitivity and Effects

It is impossible to argue that the proposed development will not be highly visible as is argued in Section 11.6. The development is to take place on a south facing slope in direct eye line with any traffic entering the village along Halfyard/Butts Batch. There may be some screening afforded by

existing properties to the east, but with a slope rising from 18m AOD to 21m AOD and then to add a further say 9m for the height of a two storey house, it is plain that the site will be very obvious to all. By the same token, any incoming views of the Grade I listed Church of All Saints will be lost. Views from the many PRoWs running to the north and west of the site will also be heavily impacted.

Although a major impact is acknowledged during construction, planting of trees and hedgerows will be unlikely to mitigate this impact to 'moderate adverse'. In any event, moderate adverse is an unacceptable level of impact given the rurality of the village and North Somerset Council's Core Strategy.

This presentation overall is heavily weighted towards favouring the developer and not the impacts upon the village.

The picture on page 19 is accompanied by some narrative. It states that during construction in the northern part of the site (which will be part of Phase 2), a small opening will be formed in the hedgerow for pedestrian access to the village. However the track on to which this proposed opening is to be formed, is neither a highway nor a PRoW. It is used solely by agricultural and other farm related vehicles and is not owned by the developer. This Council is unaware of any agreement having been concluded with the landowner to facilitate this new footway. It is unlikely that residents of Westward Close, Brooklyn or Wiltons who already enjoy spectacular sunsets and uninterrupted views at present would agree that sensitivity here is low.

The photographs depicting views into the village to inform the comments put forward are selectively chosen to favour the developer once again. More typical views which better depict the potential impacts are readily available simply by moving the camera a few metres to left or right. Their veracity as presented is therefore of limited value.

Section 10.2 (referred to above) classes the land to the west as of medium sensitivity. Table A1 (page 19) of the Landscape and Visual Impact Assessment defines 'medium' as "Valued at a community level...in good condition, with scenic and cultural qualities of local importance." This definition defies the developer's claims that impact upon the community will be minimal and acceptable.

Tables A2, A3 and A4 also highlight the adverse impact which the proposed development is likely to have upon the village and provide ammunition to deny permission to develop this site.

LIGHTING STRATEGY

Earlier sections of this response have highlighted the omission of any consideration of the lighting guidelines set out with the NSC's 'Bats' SPD, nor the restriction of street and outside house lighting imposed upon the Cox's Green development currently on-going within the village. It is not therefore proposed to labour the point further in this section other than to suggest the developer has been inadequately informed by its consultant.

OPEN SPACE ASSESSMENT

This Council notes that it is proposed that management of the on-site open space would be transferred to a management company who would undertake works in perpetuity, but the developer has not considered the effect of the said company going into liquidation. This same problem was raised by this Council in relation to the management and maintenance of the drainage on the Cox's Green site and was finally resolved with NSC agreeing to take on the responsibility.

Would the Council be prepared to underwrite the arrangement here proposed? If not, it is of limited value and opens a door to exposure in the future.

SECTION 106 HEADS OF TERMS

In view of the number of houses proposed, this Council would prefer to see a Travel Plan submitted as part of this outline proposal, since the impact upon the village, which is already heavily reliant upon private cars for transport and yet with parking places at a premium, is deemed to be substantial.

Contributions towards the Strawberry Line extension so often referred to within the proposal are currently purely aspirational. Inclusion within any S106 Agreement is therefore fatuous at this time. Contributions towards allotment areas are not welcome at this time.

It would be beneficial to all, were this Parish Council to be involved in any Section 106 agreements prior to their being concluded to ensure that real benefits flow to the Parish affected and not to other misconceived products.

GROUND INVESTIGATION REPORT

Para 1.2.1 This section refers to the site investigated as being some 2.85ha, but the gross area of the site is elsewhere stated as being 4.56ha. In view of the findings described later and highlighted in the table on page 5 of this report, it is inconceivable that the remaining uninvestigated part of the site be ignored. A full site investigation is clearly imperative. Exceedance of permitted levels of heavy metals in the form of lead and beryllium are a cause for concern, as it exposes the possibility of ingestion, inhalation or dermal contact. Surely, before taking the suggested step of using a 'clean cover system', it would be more prudent to re-test the whole site?

The comments as to suitability for soakaways to aid surface drainage are also of interest. The levels of Barium (heavy metal) and zinc shown in the table on page 62 of the Report (Analytical Report 20-13631) are also worthy of further investigation.

AGRICULTURAL LAND CLASSIFICATION

It is stated that the land is classified as Grade 4 for agricultural purposes, due to 'wetness', which must surely be a consideration in considering the site's suitability for residential development. It is incumbent upon NSC to make enquiries of Natural England to confirm or otherwise the grading of the land, as set out in Natural England Technical Information Note TIN049 (page 17 of the Report).

PRELIMINARY ECOLOGICAL ASSESSMENT

The Assessment identifies the presence of hazel dormouse and potentially important habitat for bats, otters and water voles (all of which have been locally noted in the habitat area). It goes on to indicate that there will be a 30% decrease in biodiversity as a result of this development. It goes on to state that this loss may be possible to off-set by increasing biodiversity in the most southerly section of the site, alongside the river and within the flood zone. It does not however indicate any net gain in biodiversity or habitat, which causes serious concern. The assessment also recommends further surveys be undertaken for hazel dormouse and great crested newt. The riverside area is already designated as a Site of Nature Conservation Interest by NSC, as well as being subject to the aims and objectives set out in Policy CS4. Also noted is that recognition has been afforded to the

bats' protection zone which washes over the whole site. Section 3.3 of the Assessment sets out the methodology for achieving a net gain in biodiversity on the site.

Section 7 sets out a means to achieve a claimed increase in biodiversity to counterbalance the loss of habitat/diversity due to site construction, and suggests planting orchard trees and creating lowland meadow over a 1ha site. It fails to note however that the proposed area is subject to flooding (Flood Zone 3) of up to 1m, which would inundate any habitat and have a detrimental effect upon the ecology and the trees proposed. Is this really a net gain? It suggests also that tree whips should be planted, but such whips will take several years before they are able to be of benefit in providing forage sites and nesting sites, whereas biodiversity and ecology is being lost immediately by construction.

Full and proper surveys for dormice and bats have also been recommended, and it must be noted also that this document was written in October and not when animal activity is at its peak.

PROTECTED SPECIES ASSESSMENT

This Assessment has been drawn up by the same firm which undertook the Preliminary Ecological Assessment referred to above. It makes many sound recommendations for ensuring protection of species, with detailed references to various parts of NSC's Core Strategy and other nationally important legislation. If all these recommendations are adopted, conditioned and followed, then protection of species could be safeguarded during construction. It does not however mention that construction is set to be in two phases, nor what impact that timeframe could have upon the ecology on site.

Although the preliminary survey noted no badger presence, nevertheless this Assessment (Section 4.1) shows a badger sett and sighting early in the year (May 2020) with two freshly dug holes noted in October 2020. This added 'information' puts the value of the Preliminary Assessment into question as to its accuracy and depth of investigation. Similar results identified hazel dormouse as present adjacent to the site.

Section 4.3.1 identifies the site as being highly suitable for bats, and subsequent data from surveys upholds that view. This information highlights the need for careful consideration as to the damage to bats' foraging routes which will be as a result of the proposed development and the need for strict adherence to the guidelines and constraints set out in the relevant Supplementary Planning Document should approval be granted.

It also needs to be established where responsibility lies for maintenance and replacement of the bird and bat boxes which the Assessment recommends be installed.

RESIDENTIAL TRAVEL PLAN

Para 1.3 states that "Measures and initiatives will be provided before (Council's emphasis) the development is fully occupied to maximise the opportunity to influence new residents' travel patterns before they have become established." Does this mean after Phase 1 is fully occupied, or after Phases 1 and 2 are fully occupied? It is frankly nonsense and carries no weight whatsoever.

Para 2.1 This descriptive is very limited and also misleading. Congresbury is not a town, it is a village. Butcombe is also a (small) village. Long Ashton is also classified as a village. Clearly this paragraph is written to deceive.

Para 2.4 Table 2.1 is outstandingly wrong. The Rainbow Montessori Nursery School is not in Wrington, it is in The Lynch in Winscombe. As a consequence it is far further distant than the 1.37km or 17mins walking distance from the site. The Gatcombe Farm Industrial Estate is no longer an industrial estate and should not be included in this table (see also Paras 2.13 and 2.15). It is currently an empty site within Green Belt. Equally, walking to either Mendip Vale Medical Practice or Bristol Airport is both impractical and unlikely to ever be undertaken.

No mention has been made of either the Recreation Field Play Area or that on Church Walk, both of which are considered valuable community facilities. Equally, it is relevant to point out that the dentist is private patients only and does not undertake NHS work. A lack of proper research is indicated by this misleading and inaccurate information.

Para 2.17 There is no 'Glebe Road' in Wrington. The bus referred to operates only 4 services daily from Wrington to the airport, so this cannot be seriously considered as an available or convenient means to access the airport. This statement is being economical with the truth and should be dismissed.

Table 2.3 for some reason omits Bristol Temple Meads station from its content, yet trains from Yatton regularly call at Temple Meads. Once again this demonstrates a clear misunderstanding and lack of background research contributing to a shoddy and inaccurate, not to say deliberately misleading document, which should be rejected in its entirety.

The measures proposed and the subsequent data which accompanies and informs the proposed initiatives are untested, unreliable and impractical. Measures to promote transport other than private car use cannot be achieved by the means proposed, with the net effect that pollution levels from vehicular transport will not be decreased and will not therefore contribute to meeting NSC's carbon reduction targets.

The chart shown as Fig.2 fails to highlight many of the facilities and services mentioned earlier in the document and both Fig.2 and Fig.3 indicate bus stops on School Road and Long Lane which are no longer on any bus route. Once again, these elementary errors indicate an inadequately researched, inaccurate and unreliable presentation which must be dismissed and being of no value.

TRANSPORT STATEMENT

Para 2.6 This statement is fundamentally wrong. Halfyard southbound beyond the 30mph zone reverts to the national speed limit applicable to single carriageway roads which is 60mph, not the 70mph quoted. Two cars can only pass with care and a car and a lorry or large van can only pass when one party gives way to the other.

Para 2.9 It must be mentioned that parked cars on the east side of Station Road limit traffic access to one lane for a large proportion of its length; most villagers give way to vehicles already committed to this stretch of road, but school coaches for instance can only negotiate this narrow section with great care.

Para 2.10 It should be pointed out that the coffee/gift shop and the (now closed) opticians are on Broad Street, not Station Road as the Statement claims.

Para 2.12 The parking bays along each side of Broad Street are to accommodate both residents and shoppers, some of which is time limited and also incorporate delineated Bus Stop curtilages where no parking is permitted.

Table 2.1 If vehicle movements over a 2hr. period (120 mins.) are 1,193, then that equates to 9.94 vehicles per minute on a daily basis, indicating that the 'peak traffic' hours chosen to inform this

study are not representative of the whole truth, but presented to deceive. It is also pertinent to remember that traffic movement would be at its nadir during the period of the survey, due to Covid-19 restrictions and their impact upon free movement, including schools.

Further Tables and Sections of this Statement continue to present information and data which has already been fundamentally destroyed by the level of its accuracy or the misrepresentation of facts, all of which have been adequately highlighted in other sections of this document and which this Council does not feel it necessary to continue to repeat.

This Statement however remains fundamentally flawed, poorly researched and just plain wrong. It is of no value whatsoever.

PLANNING STATEMENT

In order to avoid any ambiguity or misunderstanding, it needs to be pointed out at the beginning that the document contained within Appendix 2 of this Statement is purely the original assessment of sites, and that the Butts Batch site included for assessment was not carried forward to the adopted policy. Its relevance to the current situation is therefore nil and it should be regarded as irrelevant.

It should also be pointed out that details of the Appeal Decision relating to Cox's Green development (Appendix 1) does not, despite the developer's contentions to the contrary, constitute a precedent for the proposed development at Butts Batch.

Para 2.5 All Saints Church is Grade I listed, not Grade II.

Para 2.7 The strategic cycle route remains an aspiration, not a reality to be considered as relevant in deliberating this application.

Para 2.9 Note that the river Yeo and associated SNCI is acknowledged and it also refers to 'adjacent land' which should not be interfered with in respect of the proposed southern area which it is proposed will be biodiversity enhanced. This must be carried through the entire proposal but appears not to have been so.

Para 2.11 This is a somewhat skewed and unbalanced translation of Policy CS32. Please refer to pages 2-5 of this document for verbatim content of that policy, many parts of which have failed to be met.

Para 2.12 Both the industrial estates mentioned have very limited employment opportunities, with many of the employees bringing their skills in to the businesses situated there from outside the village in order to meet employer needs. A major employer on the Havyatt Estate has recently closed down, thus reducing further possible employment opportunities within the village.

Para 2.14 As previously highlighted (page 6 of this document), public transport is very limited with only 4 buses in each direction daily and no Sunday service. Furthermore, it is understood that the current, under-used service is under threat of withdrawal, but whilst it continues to run, the timetable for service A5 is readily available on-line.

Para 3.7 This Council is of the opinion that the development at Cox's Green does not create a precedent for the proposals to develop at Butts Batch. The paragraph draws attention to Policy CS14, but that policy states as follows:-

"At service villages there will be opportunities for small-scale development of an appropriate scale either within or abutting settlement boundaries or through site allocations. Elsewhere development

will be more strictly controlled although appropriate development will be acceptable within the settlement boundaries of infill villages."

"Settlement boundaries define the area within which residential development is acceptable in principle, subject to compliance with other policies in the plan. Development outside the settlement boundaries will only be acceptable where a site is allocated in a Local Plan or where it comprises sustainable development which accords with the criteria set out in the relevant settlement policies (CS28, CS31, CS32 and CS33)."

Para 4.6 Note once again a reference to a cycle route to the north of the site, but at least an acknowledgement that delivery of that is outside the developer's compass. In other words it is purely aspirational and therefore should not be considered as an influential factor to be considered in the determination of this application.

Para 5.4 The list of Core Strategies and Development Management Policies, though extensive, are not exhaustive and for instance do not include Supplementary Planning Documents such as that relating to the protection of Bats, or to Parking Standards. Translation of these policies has, throughout this application, been both economical and heavily weighted towards the proposed development, with, in many instances, a failure to put forward a balanced view.

There has been no attempt by the developer to align itself with the emerging document 'Choices for the Future' which, although not yet adopted as policy, sets out NSC's aspirations and strategies for development and spatial policy for the future. If this application is aligned with 'Choices for the Future' and the emerging 'West of England Placemaking Charter', it would fall at the first hurdle.

Para 7.3 The Government's consultation has since been debunked and revised in view of widespread condemnation of its content.

Para 7.4 There is no reason why NSC cannot wait – if only to close out speculative proposals.

Para 7.9 As set out at the beginning of this document, this paragraph is utterly wrong and paints a picture which differs totally from reality. The 10.6% overall growth covers not Wrington village but takes into account the wider parish, including the north east ward, thus skewing the figure in favour of development again. Increase within the village is covered on pages 1 and 2 of this document.

Para 7.11 It is unjustified to state that an ageing population is a result of a lack of growth. There are many factors which remain unconsidered which result in an ageing population, not least of which is that people are living longer and perhaps don't want to leave the village as it has everything to meet their needs and aspirations as a fulfilling place to live. This unproven and wide-sweeping statement is presented without a shred of supporting evidence and should be dismissed. Why is the expression "at a Parish level" being used? Surely the context should be 'at a village level' to be consistent with other arguments being propounded in support of the application? This unfounded statement can in no way be justified to support the statements set out in paragraphs 7.12 or 7.13 which remain unrelated statistically. If only 1 in 3 of the houses proposed for Butts Batch sent one child of primary school age to Wrington primary school, the projected capacity gap would be filled. Thus, to indicate spare capacity in coming years remains very much an argument unsettled.

Para 7.14 Whilst acknowledging that public transport is 'limited', and quoting the availability of onward transport from Bristol airport to Bristol city, this is only half the story. The service A5 is barely used because it only runs four services each way daily. The first service from Wrington leaves at 09.42hrs. and the last service to Wrington leaves the airport at 16.57hrs. These timings are hardly conducive to meeting commuting needs and, in practical terms, the service available is inadequate and under threat of withdrawal because it is not cost effective to operate. (See also para 2.14 above and the Transport Assessment comments.)

Para 7.17 and 7.18 The argument set out in para 7.17 is not justification or logical to promote further development at Butts Batch. The figures put forward in para 7.18 have already been proved to be unrepresentative of the true situation in previous sections of this document. Consequently these sections should be dismissed.

Para 7.23 It is unsurprising that the applicant has itself put forward the site for development. However justified the applicant feels, NSC in its emerging Local Plan, 2038 prefers other options such as protecting rural villages from speculative developments.

Para 8.6 The argument propounded in this paragraph is not necessarily a sound one where NSC is drawing up a new Site Allocations Plan based on approval and adoption of its 'Choices for the Future' policy, though it is acknowledged that this policy remains to be formally adopted.

Para 8.10 The conclusion that Wrington is a sustainable location cannot be reached or justified purely on the basis that the Cox's Green development was given approval by a Planning Inspector following appeal. Cumulative impacts and other changes in the interim must be taken into consideration.

Para 8.12 It is a leap too far to promulgate that village shops would have a more secure level of viability as a result of the 71 houses proposed. It is unsubstantiated and a contrary argument could just as easily be put forward.

Para 8.13 The figures quoted relate to the whole of Wrington parish, not just Wrington village. As a result the impact percentages are skewed to reflect the least impactful scenario, whereas if the figures set out at the beginning of this document are used, a very different outcome is obtained. Average household size is of no relevance to the argument. It is the village of Wrington upon which the proposed development will most impact, not the outlying settlements falling within the parish boundary. Once again, the developer is presenting misleading and inaccurate information to distort the statistics.

Para 8.18 Once more, the developer is using distorted statements to support its argument. There is no realistic public transport serving Wrington as explained many times already!

Para 8.19 The statement in this paragraph takes no account of the narrow country lanes which permit access to and egress from the village. Butts Batch/ Halfyard allow vehicles to travel to Lower Langford, but there are many places along that route where it would be difficult for other than two cars to pass comfortably. Other access lanes suffer similar constraints which have gone unrecognised also.

Para 8.21 The Landscape/Visual Impact section ignores the impact upon the residents of Butts Batch, Kings Road and Westward Close, together with parts of Brooklyn and Wiltons which would suffer from overlooking and loss of visual amenity currently available to them. Please see pages 16 and 17 of this document for further information.

Para 8.35 This statement refers once more to the Strawberry Line cycle route, but fails to inform that it is purely aspirational and should not therefore constitute a consideration to this application.

Para 8.39 This Council has grave doubts that the existing ecology and wildlife recognised as inhabiting the site and its environs will not suffer severe degradation as a result of this development and notwithstanding the proposals to protect it. New hedgerows for instance take several years to mature to the point where they are capable of providing feeding or nesting areas for wildlife and with two phases of development proposed, that 'construction' period will be of a longer duration with attendant disruptions. This statement indicates a degree of naivety on the part of the writer.

Para 8.63 It is of concern that ground contaminants were found across the site, notably heavy metals, which could have a harmful effect on any homegrown produce. Skimming off a top layer and replacing it with uncontaminated soil gives cause for concern as a lasting remedy and further research is required before it can be claimed that the land is 'safe'. This aspect must be a major consideration when assessing this application.

Para 9.5 It is important to understand that the £2.1m extra expenditure produced by the proposed development will by no means all accrue to Wrington, and thus is not a valid argument in favour of development; this should be dismissed as irrelevant. The incomers will already be spending wherever they are currently living so in effect there will be no change in expenditure across the wider spectrum, nor is there any certainty that all such spending will be in Wrington.

Para 10.3 The so-called consultations with the local community (only a 11% response – none in favour) and the Parish Council (a perfunctory presentation of what was available on the designated website) could hardly be called realistic or adequate.

This Council remains unimpressed by the arguments and supporting information which has been put forward on the developer's behalf. It is very obviously of poor quality and deliberately sets out to deceive by manipulating the data or being economical with its translation whilst presenting it as fact. This Council therefore maintains its strongest possible objection to the ill-conceived and speculative attempt to urbanise the rural village of Wrington.