

ISSUES AND OPTIONS CONSULTATION:

The new Local Plan is an opportunity to avoid the failings of the Joint Spatial Plan (JSP) by explicitly considering and consulting on realistic, alternative options, and clearly presenting the underlying evidence and assumptions from the start of the process.

That is about as far as the Issues and Options consultation should go. Responses to the consultation should not be drawn into details about the future form of the plan or its proposals. For example, there should be no presumptions about land use and transport proposals, such as the future development of the airport or related proposals including the 'South West Economic Link' (i.e. increasing capacity on the A38 south west of Bristol) or links from the M5 (i.e. increasing capacity on the A368 corridor from a new M5 Junction 21A).

For the Issues and Options Consultation, the Council should be clear and transparent about the issues that will need to be considered and how they will be addressed, including;

- the options that will be considered;
- the assumptions by which realistic alternative options will be defined and evaluated;
- the evidence base that exists already from the JSP and the Joint Local Transport Plan (JLTP);
- the need for new surveys; and
- the form of future consultations that will take place with interested organisations like parish councils and the general public.

SETTLEMENT STRATEGY AND GREEN BELT:

An essential part of the settlement strategy will be a review of the general extent of the inner boundaries of the Green Belt around Bristol and other settlements. The Issues and Options Consultation should be clear about the need to review the general extent of the Green Belt and, in particular, its inner boundaries around Bristol and other settlements, including the need to accommodate strategic urban extensions to the City of Bristol for example at Ashton Vale.

It is questionable whether the outer boundaries of the Green Belt also require a strategic review, as other policies are likely to be more appropriate for rural settlements and the countryside in more rural parts of North Somerset including areas bordering the Mendip Hills AONB.

The settlement strategy should be explicit about the scope for different approaches in different settlements including the selective expansion of some existing settlements, for example: infill development only, a review of the settlement boundary and/or small site allocations (subject perhaps to neighbourhood plans) and opportunities for sustainable new settlements.

HOUSING PROVISION:

North Somerset Council has accepted in a number of planning appeals (including an appeal decision on land south east of Nailsea dated 29th November 2019) that it could not demonstrate a five-year supply of housing land. In that case, the agreed supply was 4.4 years, consistent with the Council's Residential Land Survey and Five Year Supply Position Statement of April 2019.

One consequence of the coronavirus crisis is that there is uncertainty about how the Government will proceed with its policies for housing land supply. What is the current position in North Somerset, taking account of commitments since the last update in April 2019 to include sites subsequently granted permission on appeal?

If there is still a problem with the five-year supply of housing land, would it not be better for the Council to undertake a *partial* review of the Site Allocations Plan (SADPD) to establish a five-year supply of housing land (to 2025) before completing the New Local Plan? A partial review could also include any other proposals that require the urgent backing of an adopted development plan. It could also form the basis for new Neighbourhood Plans and reviews of existing Neighbourhood Plans.

To demonstrate a five-year supply of housing land and to carry full weight in planning appeals, a partial review of housing sites would need to be incorporated in an adopted development plan. It would also be necessary to make clear through the plan's examination that the Council was seeking to confirm the existence of a five-year supply in a recently adopted local plan, taking account of housing requirements and supply, criteria of deliverability and the Housing Delivery Test.

Following examination, the Inspector's report would then provide recommendations to help the Council confirm that they have a five-year land supply of housing land in a recently adopted plan. In following years, the Council would confirm a five-year housing land supply through an Annual Position Statement, avoiding the need to revisit its analysis in successive planning appeals.

The aim would be to achieve adoption of an interim plan/partial review within 12 to 18 months, leading on to a longer-term strategy in the New Local Plan. The partial review of the SADPD would not be a long-term spatial strategy but would be flexible enough to be compatible with a variety of longer-term options.

The background evidence for a partial review of the SADPD and for a New Local Plan would include an updated Strategic Housing Market Area Assessment (SHMAA), based on the standard method for assessing housing requirements, and an updated Strategic Housing Land Availability Assessment (SHLAA), following a call for sites and an agreed methodology for assessing sites as either:

- (a) consistent with policy; or
- (b) worthy of consideration in an updated policy; or
- (c) rejected as unsustainable.

It would be impossible for a partial review of the SADPD to include Green Belt sites in advance of a comprehensive, strategic review of the Green Belt that identifies where '*exceptional circumstances*' justify the alteration of Green Belt boundaries, primarily because of the need to promote sustainable patterns of development.

A comprehensive strategic review of Green Belt will also need to be associated with:

- a comprehensive review of locational strategy (taking account of development for employment and other uses); and
- a settlement strategy (identifying the future roles of settlements to reflect their locations, sizes, facilities, and environmental constraints, etc.); linked with
- an appropriate transport strategy (covering all modes).

Green Belt Review will require the adoption of a New Local Plan. In an interim plan/partial review, it will be necessary to demonstrate that proposals do not constrain a New Local Plan and contain sufficient flexibility to be associated with a variety of longer-term options.

Could a partial review of the SADPD identify enough potential housing sites outside the Green Belt to provide a five-year supply of housing land for adoption in an interim plan? The Issues and Options consultation should address that question.

TRANSPORT PROPOSALS:

In relation to transport proposals, the Issues and Options Consultation must explain how proposals in the Joint Transport Study and the recently adopted JLTP reflect assumptions about future development and how the JLTP will respond to new land-use proposals in the Local Plan. For example, the JLTP proposes major improvements to the A38 between Langford and South Bristol and major changes to the A368 between its junction with the A38 and a new Junction 21A on the M5.

The JLTP states, in relation to the A368 corridor (page 76): *'The scheme will improve links to the airport and improve resilience of the Strategic Road Network and locally will improve access to potential housing & residential growth.'* To what extent are the proposals in the JLTP justified by and dependent on assumptions about future housing development on these corridors and assumptions about the expansion of the airport? Do they pre-judge proposals in the local plan and decisions about planning applications by the airport?

THE AIRPORT:

For the airport, options to be considered must reflect different scales of operation (expressed in passenger and flight numbers, peak road traffic flows, car parking provision and physical development on the site etc.) compared with the existing baseline situation (9 mppa) and the commitment of growth to 10 mppa. These options should be evaluated in terms of their environmental impacts, including implications for flights, surface access, highways, physical development, and car parking.

The current proposal for expansion to 12 mppa (an increase of 33% from the current figure of 9 mppa) and the scenario of continuing growth to 20 mppa (an increase of 222%) should be compared with the current position as well as the commitment to 10 mppa, in terms of flight numbers and road traffic.

A rigorous approach to the estimation of uncertain economic benefits is essential, to ensure that they are correctly balanced against the very tangible environmental costs of additional flights, growth in road traffic, physical expansion of the airport and the related demand for car parking. Such an approach should address the question posed by Liam Fox MP:

'What is a reasonable limit for expansion that will ensure, on one hand, the viability of the airport and potential support for the local and regional economy without, on the other, creating undue pressure on the local environment and its population?'

OTHER QUESTIONS:

The Pre-Commencement Document states that site allocations '*will be set out in a non-strategic section of the plan*'. Will the more detailed, non-strategic policies be published at the same as the strategic policies? If not, what will be the sequence for public consultation?

Following withdrawal of the Joint Spatial Plan, related documentation will be removed from the public domain. However, some of the evidence base for the JSP will also be relevant to the new Local Plan. Will data from studies related to the JSP that are relevant to the Local Plan be re-published with the Issues and Options Consultation?

Will an updated SHLAA and SHMAA be published before the Issues and Options Consultation?

Will Parish Councils be consulted on the procedures for public consultation and will North Somerset Council engage in the process through open public meetings, which were denied as part of the JSP process - when the coronavirus lockdown is lifted? Will other interactive opportunities be provided online if the coronavirus lockdown is still in place? Will the consultation programme be halted until public engagement can take place?

Is the timetable for consultation on Issues and Options in May-June 2020 still realistic, in view of the fact that consultation on the Pre-Commencement Document only closes on 22 April 2020 and the coronavirus lockdown has prevented meetings of parish council and other organisations?

Burrington Parish Council

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