

## SA all comments Local Plan 2036 Issues and Options

Document Part Name		1. Have all relevant plans and programmes been referenced?		
Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
Avon Wildlife Trust	Avon Wildlife Trust	21314273//1	<p>The North Somerset and Mendip Bats Special Area of Conservation (SAC) Guidance on Development: Supplementary Planning Document has not been referenced. This is a very positive piece of planning guidance and it is extremely important that it is used to shape planning decisions across North Somerset. We would welcome transparency about how this document has been applied to support sustainable development as described in the Local Plan 2036.</p> <p>We also note that the emerging West of England Green Infrastructure Plan has not been referenced. While we understand this is still in development, we would expect principles of well-connected and multi-functional green infrastructure to be integrated throughout the Sustainability Assessment as presenting wide ranging impacts and opportunities on sustainability issues.</p>	
Cleeve Parish Council	Cleeve Parish Council	1045633//1	<p>The Scoping Report suggests that alternatives can be put forward to be assessed in the Local Plan at stage B by printing the following statement in the scoping report; '<i>Develop the Local Plan options including reasonable alternatives</i>'. CPC believe that Issues and Options Consultation is premature as the Joint Spatial Plan has yet to be examined..</p> <p>The Scoping Report has failed to reference the Health Impact Assessment which will be required to show how residents' quality of well being from expansion of Bristol Airport will not deteriorate.</p>	
CPRE Avonside	CPRE Avonside,	20273121//3	Not sufficiently in terms of future aspirations that would damage the environment.	

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	North Somerset District			
Diane		8052353//1	<p><b>Sustainability Scoping Report:</b></p> <p><b>page 32, map 6, National and Local Nature Reserves:</b></p> <p>Stockway North Nature Reserve in Nailsea is missing from the map.</p>	
Gladman Developments Ltd	Gladman Developments	11199745//1	<p>In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in local plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.</p> <p>The Local Plan should ensure that the results of the SA process clearly justify any policy choices that are ultimately made, including the proposed spatial strategy and associated site allocations when considered against 'all reasonable alternatives'. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Councils' decision making and scoring should be robust, justified and transparent.</p>	
Gladman Developments Ltd	Gladman Developments	11199745//2	<p><b>Sustainability Appraisal</b></p>	

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			<p>The Local Plan should ensure that the results of the SA process clearly justify any policy choices that are ultimately made, including the proposed spatial strategy and associated site allocations when considered against ‘all reasonable alternatives’. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Councils’ decision making and scoring should be robust, justified and transparent.</p> <p>The Local Plan should ensure that the results of the SA process clearly justify any policy choices that are ultimately made, including the proposed spatial strategy and associated site allocations when considered against ‘all reasonable alternatives’. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Councils’ decision making and scoring should be robust, justified and transparent.</p> <p>The North Somerset Local Plan 2036, as currently drafted, is to follow the outcome of the WoE JSP and plans to deliver the strategy set out in the Spatial Plan as well as setting a local context including local housing and employment allocations. The Local Plan outlines on page 4 that the distribution of the approximate 25,000 new homes to be delivered over the plan period 2018-2036 will be as follows:</p> <p>Gladman have been critical of the housing requirement which has been set out in the submission version of the WoE JSP. The individual housing requirements for each of the four local authorities has yet to be examined by the Inspectors and it may be the case that North Somerset has to plan for additional growth to what is currently planned for above.</p> <p>It is Gladman’s opinion that the housing requirement set out in the JSP is significantly below the full housing need for the area which stems from a very conservative approach to tackling housing</p>	

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			<p>affordability and low economic growth assumptions when compared with past performance. This issue is set out in full in Barton Willmore’s response to the JSP on the housing requirement on behalf of the development consortium.</p> <p>The sites that the Local Plan 2036 allocates will need to provide the house building industry and prospective house purchasers with a choice of size and locations to ensure that local housing needs are met and that a five-year housing land supply can be achieved and maintained. A reliance on the strategic sites in isolation will inevitably result in delivery falling behind the required rate.</p> <p>The strategic development location sites identified in the JSP must be thoroughly tested to ensure that they are deliverable, viable and are located in areas which are or can be made sustainable. As an example, the Banwell Garden Village seeks to deliver 1,900 homes but requires a new junction</p>	
Natural England	Natural England	1018753//1	<p>We would expect the emerging WoE Green Infrastructure Plan, the JSP Appropriate Assessment and the North Somerset &amp; Mendip Bats Special Area of Conservation (SAC) Guidance on Development SPD will be relevant to the SA/SEA for the new North Somerset Local Plan. These will also be of relevance to the Appropriate Assessment, required under the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations)</p> <p>As previously highlighted, there is a need for more ecological information, particularly about the use of the SDL areas by horseshoe bats, and more widely in relation to the effects of recreation on legally designated sites.</p> <p>The multiple and crosscutting functions and wide range of benefits to society that can be provided by a high quality and connected green infrastructure network are well documented and could be more clearly reflected in the Sustainability Assessment and the framework objectives and indicators.</p>	

<b>Respondent Name</b>	<b>Respondent Organisation</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Attached documents</b>
Parish Councils Airport Association	Parish Councils Airport Association	21278401//1	There is no reference to the fact that Bristol Airport is preparing a Master Plan to 2040. NSC must be aware of the BA Master preparation from the recent consultations: 'Your Airport: Your Views' and the 'Your Airport: Your Views Towards 2050 Master Plan Consultation – Stage II'. It is particularly disappointing that there is no reference to the Airport's growth beyond 12 mppa which is expected in the mid 2020's and that the Joint Spatial Plan has highlighted the airport as a strategic employment zone with an underlying assumption of further growth through airport activities, i.e. increased air transport movements.	
Pegasus (D Millward)	Pegasus Group	21482337//1	<p>What is a Sustainability Appraisal and will there be one for the Local Plan?</p> <p>In preparing our response to the IOP we have also reviewed and considered the contents of the Sustainability Appraisal (SA) Scoping Report (September 2018).</p> <p>We note and welcome the issues identified by the Council as set out within Section 2 of the SA recognising the importance of 'meeting communities needs for housing, including affordable housing' and 'pressure on the countryside/greenfield and Green Belt sites from planned development'.</p> <p>Table 10 identifies that significant housing growth is required over the plan period. It goes on to highlight the need for the Local Plan to secure the delivery of housing in the right places and expresses an understanding that there will be a need to look sequentially at greenfield opportunities, given that opportunities for brownfield sites to contribute are somewhat limited.</p> <p>Given that brownfield opportunities are limited, we would suggest that achieving 1,000 dwellings as part of urban intensification/urban living maybe problematic. As a result, the least sensitive greenfield/green belt locations should be prioritised.</p>	

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			<p>We note that the Council’s own landscape evidence suggests that the majority of the site we are promoting is of ‘low sensitivity’.</p>	
Stowey Sutton Parish Council		21235137//1	<p>Stowey Sutton Parish Council (SSPC) supports the response to this consultation provided by The Parish Councils Airport Association (PCAA) of which it is a member.</p> <p>SSPC’s general view of the Sustainability Scoping Report is that for future appraisals and the SEA on issue of Bristol Airport is that the four options shown in the Local Plan Issues and Options Document must be appraised for the Plan period. SSPC expect to see all four options assessed in this way.</p> <p>Further growth at Bristol Airport does not support four of the five objectives without compromising sustainability and ability of future generations to meet their own needs which are:</p> <ul style="list-style-type: none"> <li>• Support communities that meet people’s needs</li> <li>• Improve health, safety and wellbeing of all</li> <li>• Develop a diverse and thriving economy that meets people's needs</li> <li>• Minimise consumption of natural resources</li> <li>• Maintain and improve environmental quality and assets</li> </ul> <p>SSPC would argue strongly that Bristol Airport already meets people’s needs and currently helps the economy to thrive without further growth.</p> <p>The plan does not reference the Master Plan to 2040. NSC must be aware of the BA Master preparation from the recent consultations: ‘Your Airport: Your Views’ and the ‘Your Airport: Your Views Towards 2050 Master Plan Consultation – Stage II’. There is no reference to the Airport’s growth beyond 12 mppa which is expected in the mid 2020’s and that the Joint Spatial Plan has highlighted the airport as a strategic employment zone.</p>	

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Waddleton Park Limited (Savills)	Waddleton Park Limited	21580161//1	<p>In light of the need for housing across North Somerset, and the national policy approach of supporting sustainable growth across all communities, we support the decision to consider the objectives underpinning the Sustainability Appraisal (SA). It is important at this early stage of plan-making, that the SA objectives remain at a high level, and flexible to respond to the differing opportunities for growth across North Somerset. As such, given the role of the nLP, we raise a concern that the replication of the SA which underpins the emerging West of England JSP is not appropriate. The objectives of the JSP are substantively different to the nLP, and the SA objectives should therefore be re-considered for the purposes of the nLP.</p> <p>In this regard, we make a number of comments below where we raise a concern with the emerging SA, and that the use of a strict criteria based approach to assessing sustainability isn't a reflection of the local context, the scope of the nLP and the NPPF's recognition that all settlements have a role to play in delivering sustainable development.</p> <p>The concern in regard to a strict criteria based approach has most recently been highlighted by the report, 'Sustainable Villages – Making Rural Communities Fit for the Future' (CLA Policy Briefing, 2018), which emphasises the risk of a criteria based approach being <i>"no longer fit for the modern, digital age, and must be re-examined"</i> (p.9). The report highlights that the criteria based approach fails to account for modern day access to services and facilities, doesn't reflect the nature of rural communities and the clustering effect of villages, and undermines the sustainable growth of these rural communities.</p> <p>We comment below that the assessment of development options for the nLP needs to take a high level, balanced approach, and that adherence to a strict accessibility criteria would not be supported.</p> <p>Simply referencing the JSP evidence base is not sufficient in regard to the housing need section – in particular in respect to affordable housing. The JSP is explicit that it will not be able to meet the total affordable housing needs for the West of England, but it doesn't indicate within which Authorities the shortfall will occur. There is a role for the nLP to seek further opportunities to</p>	

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			<p>address this shortfall. In addition, the JSP doesn't provide a breakdown in the typologies of the housing need, which should form part of the SA baseline.</p> <p>Secondly, the SA currently has an inherent 'policy-on' element as it appears to automatically carry forward the policy designations for District and Local Centres. The nLP is reviewing these policies, and as such, they cannot form part of the SA baseline. In line with the comments above, and the PPG, the delivery of new housing has a role in supporting existing and new services and facilities within rural settlements, and this should be reflected within the assessment, this is discussed further below.</p> <p>Sustainability Objectives and Indicators</p> <p>The confirmation within the SA that there are elements of the objectives which naturally conflict is supported, and in this regard, it must be made clear that the assessment of options must be made on the balance, as opposed to a stringent exclusion of an option for scoring negatively in a particular category, where this is offset by other positive scores.</p> <p>This recognition of inherent conflict between objectives is in direct conflict with a number of references made in the SA. For example, at p44, it is indicated that the nLP should seek not to allocate development sites in areas where any facet of environmental quality is poor. However, as identified above, this may conflict with other objectives, for example the need to deliver a suitable quantity of housing. At this stage in the nLP, there should be no predetermined outputs from the SA process.</p> <p>As set out below, we welcome the decision to reconsider the settlement hierarchy, and consider the range of opportunities to deliver sustainable growth. In addition, it is well documented that a stringent approach to 'accessibility' in regard to development is not supported. The PPG makes explicit reference to the fact that "different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions</p>	

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			<p>will vary from urban to rural areas" (PPG: 50-001-20160519). A number of inspectors both within North Somerset and elsewhere have also raised concerns in regard to the assessment of accessibility against fixed distances: recognising that this fails to account for opportunities within neighbouring communities, and accessibility by walking, cycling and public transport (see 2016 Appeal Decision in Sandford – APP/15/3139633, dated 12 October 2016). It is important that a flexible approach to access to services and facilities is undertaken in the SA given the role of the nLP in allocating Non-Strategic Growth. This demonstrates the inherent differences with the West of England JSP, which based upon seeking development sites over 500 dwellings, included a significantly greater range of services and facilities required within general proximity, but also is based upon the premise that the scale of the development sites also enables onsite provision through the JSP.</p> <p>We make the following comments on the individual Sustainability Objectives:</p> <p>1.4: Achieve Reasonable Access to a Full Range of Community Facilities (post office, meeting venues, youth centres).</p> <p>We assume the reference to a youth centre is an error, given the later reference in the table relates to meeting venues. A requirement for a youth centre within 800m would be unsupported, and unrealistic.</p> <p>In light of the recognition that a range of settlements should support sustainable growth, and also in light of appeal decisions made within North Somerset, we would question the imposition of an indicator which sets 100% of development within 800m of these services. The distance in itself relates to walking only, and doesn't account for cycling and public transport opportunities.</p> <p>In addition, 800m fails to reflect walking distances in practice. The DfT's 'National Travel Survey: 2016' (NTS) indicates that 25% of all journeys and 80% of journeys under one mile (1.6km) are made by foot (Table NTS0306); with the NTS also indicates that the average walking trip length is</p>	

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			<p>0.7miles (1.3km). In addition, national guidance on this issue is provided by Manual for Streets (MfS) which, at Para 4.4.1, states that:</p> <p>"Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' [up to about 800m] walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPG13 states that walking offers the greatest potential to replace short car trips, particularly those under 2km."</p> <p>The recent NTS identifies that the average trip length by bicycle is 3.1 miles (5.0km); and that 86% of all cycle trips are over 1 mile (1.6km) and 57% over 2 miles (3.2km) (Table NTS0308). A total of 79% of all cycle journeys are made over distances less than 5 miles (8km).</p> <p>Together, these statistics demonstrate that 81% of all trips under 1 mile (1.6km) are by walking and cycling, and indeed, over half (61%) of all trips under 2 miles are by walking and cycling; questioning the appropriateness of the 800m threshold set out in the draft SA.</p> <p>We suggest that this objective is broadened to reflect accessibility to services via walking, cycling and public transport. A list of services should be included, but the requirement for 100% to be within the threshold is excessive in light of the scope of the nLP, and as such, the general accessibility to services should be part of the planning balance as opposed to a strict negative if not all the services are within the identified distance.</p> <p>1.5: Achieve Reasonable Access to Educational Facilities (primary and secondary schools)</p> <p>We reiterate our comments above in regard to this indicator: noting that the 800/1,500m referenced to access these facilities is also above the distances set out in IHF (2000) 'Providing for Journeys on Foot'; which explicitly considers distances to primary and secondary schools above these distances as being appropriate.</p>	

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			<p>1.6: Achieve Reasonable Access to Town Centre Services and Facilities</p> <p>We make comments above in relation to the pre-determination of the strategy by automatically assuming the designated Town and District Centres remain the same. As demonstrated through the planning appeals which have granted planning consent within Infill Villages, the settlement hierarchy as currently drafted fails to appropriately consider the range of services and facilities within smaller settlements and the role that these have in supporting local communities, and indeed the role that further housing growth will play in supporting the retention of these important local facilities, and providing further footfall to increase local service and facilities provision.</p> <p>We suggest that the nLP should also identify ‘neighbourhood centres/hubs’ whereby groups of services and facilities outside of designated Town and District Centres are identified. The identification of these areas will aid in the consideration of appropriate locations for further housing growth, but will also provide the opportunity to introduce local policies which protect these services and facilities.</p> <p>2.1 Achieve Reasonable Access to Public Open Space</p> <p>It is unclear what these indicators will mean in practice. The role of public open space in supporting sustainable development is agreed. The range of typologies of open space require differing degrees of accessibility – with children’s’ play space a local provision, whereas formal sports pitches are less frequently used, and users will travel greater distances to this typology. These variations should be reflected in the assessment.</p> <p>2.2 Achieve Reasonable Access to Healthcare Facilities</p> <p>We raise comments above in regard to a strict distance criteria for service provision. In particular we note that the referenced CLA Report specifically highlights healthcare services as requiring a more holistic approach to ‘sustainability’ with the use of web-related sources, and modern</p>	

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			<p>technology (notably the proliferation of GPs now using a telephone-based appointment system) varying the more traditional health service delivery, and questioning the assumption that these service need to be ‘walkable’.</p> <p>The requirement for accessibility to healthcare services by walking has also be questioned within planning appeals, in particular given the frequency of health service use by the general population. Research by the Universities of Oxford and Bristol indicated that the average number of GP face-to-face consultations per patient was 3.18/person/year (5 April 2016, The Lancet).</p> <p>It is also noted that the need for accessibility to wider health services such as opticians within 800m appears arbitrary, and doesn’t reflect the nature of the services being assessed. These may be appropriate on large scale urban development sites within the JSP, but are not reflective of the objectives of the nLP in delivering growth over the remaining plan period within North Somerset.</p> <p>Whilst general accessibility to health services is supported, as with the above, accessibility should be considered across walking, cycling and public transport, with this balanced against frequency of service use and also a reasonable list of health services.</p> <p>4.1 Achieve Reasonable Access to Sustainable Transportation</p> <p>We support this objective, and the aspiration to deliver development in locations where public transport is accessible. It is noted that a strict criteria requirement has the potential to conflict with national policy which indicates that sustainable transport solutions vary within urban and rural areas. The assessment of existing services only also fails to recognise the role that further development plays in supporting and enhancing existing public transport provision.</p>	

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WENP	West of Englnd Nature Partnership	21389665//1	We note that the emerging West of England Green Infrastructure Plan has not been referenced. While we understand this is still in development, we would expect principles of well-connected and multi-functional green infrastructure to be integrated throughout the Sustainability Assessment as presenting wide ranging impacts and opportunities on sustainability issues.	

<b>Document Part Name</b>	2. Is any significant environmental, social or economic data missing or misrepresented?
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Avon Wildlife Trust	Avon Wildlife Trust	21314273//2	We are not clear on the thinking behind the identification of the ‘moderate’ status of the identified issue of the protection, conservation and enhancement of internationally, nationally and locally recognised biodiversity and landscape character. Whilst it is encouraging that North Somerset Council hold the local Biodiversity Action Plan in such high regard it seems that the overwhelming weight of evidence is behind an ongoing and significant decline in local biodiversity. We regard the JSP and the emerging local plan as incredibly important documents in any attempt to reverse the current trends. Given the proximity of the proposed SDLs to internationally and nationally important biodiversity sites, and the requirements for planning to respect such designations, we would consider this issue ‘major’ and certainly of the same status as the respective issue of protecting the Green Belt (‘major’).	
Cleeve Parish Council	Cleeve Parish Council	1045633//2	Firstly, there is no mention that Bristol Airport is predominantly a leisure airport with less than a fifth of all passengers being business. Secondly, there is no mention that flying is the most carbon	

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			<p>intensive activity a person can do and that aviation is one of the fastest growing sources of greenhouse gases. The increase in carbon emissions from Bristol Airport should be known. Table 9 shows that emissions from road transport are increasing but does not state emissions from air travel. CPC believe that the proposed Local Plan will allow transport emissions for both car and air to increase further as there is no direct rail to Bristol Airport. The predominant means of travel to the Airport will remain the car. Likewise, commuting from Weston and from housing not situated close to Bristol will only increase car emissions further. The Sustainability Appraisal should show how it will fit into reducing emissions to help meet the fifth carbon budget covering the period 2028 – 2032 set by the UK government.</p> <p>Although the scope recognises <i>‘that planned expansion has the potential to impact a range of environmental (and socio-economic) receptors, and as such an Environmental Impact Assessment will be required to demonstrate how these have been considered and where appropriate mitigated’</i>. These impacts should be stated here to ensure that none are missed. For instance, from 10 mppa there will be a substantial increase in air transport movement taking any respite from noise away from residents; there will be a huge increase in cars on the local roads leading to more congestions and more parking issues. The Sustainability Appraisal Report must show how these issues will be resolved and in some areas mitigation will not be appropriate and not suffice.</p> <p>The cumulative impact of the proposed expansion of Bristol Airport must be considered including the new housing developments proposed and those already having consent such as the 700 houses at Yatton which have not yet been assessed. A full and comprehensive understanding of the transport and land use implications is required in order to understand the impacts on residents’ quality of life and the local and global environment. The Issues and Options document is heavily dependent on new roads being constructed. None of the transport reports are available but we want to see alternative options to new roads as these will just encourage further car travel and not produce any behavioural change. NSC must demonstrate to North Somerset residents how they are taking seriously the health risk associated with vehicle emissions.</p>	

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CPRE Avonside	CPRE Avonside, North Somerset District	20273121//2	A better representation of the issues relating to news roads, traffic, housing and airport expansion is required.	
Environment Agency	Environment Agency	21252257//1	<p>The Scoping Report mostly fails to refer to the water environment except with regard to flooding. There are no relevant data on water quality or resource contained within the Environmental Baseline section of the report. National Planning Policy Framework (NPPF) Paragraph 158 expects Local Plans to be based on adequate, up-to-date and relevant evidence about the environmental characteristics and prospects of the area. Groundwater and surface water provide important sources of water in the area for people and the environment and the Sustainability Appraisal must consider potential impacts on the quality and quantity of these resources.</p> <p>The River Basin Management Plan for the Severn River Basin District provides an over-arching source of information on the status of the water environment and objectives for the future. This should form part of the evidence base on which planning decisions are made in line with NPPF Paragraph 165. Potential impacts on water bodies within the area should be formally assessed and reported in the Sustainability Appraisal.</p> <p>Areas sensitive to water pollution should be identified and accounted for in the plans. Information available via DEFRA's mapping website, Magic, (<a href="https://magic.defra.gov.uk">https://magic.defra.gov.uk</a>) may assist in identifying sensitive areas, e.g. Source Protection Zones, Drinking Water Protection Areas.</p>	
Environment Agency	Environment Agency	21252257//6	It is recommended that the Evidence base includes a reference to the recently published UK CP 18 report on Climate Change.	

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			In addition, the emerging updated Strategic Flood Risk Assessment should be included in the future.	
Parish Councils Airport Association	Parish Councils Airport Association	21278401//2	<p>To date the only economic report is written by Bristol Airport. An independent report is required that includes the negative impacts on the people's well being and the environment as well as the tourist deficit. The PCAA express the view that that expansion of the airport should not be driven by a 'predict and provide' model based on unsubstantiated forecasts, but by a clear justification in terms of economic benefits.</p> <p>The PCAA note that York Aviation's report shows that only about 17% of passengers in 2015 were travelling for business which supports a review of the tourist deficit.</p> <p>We note that within the evidence papers for the Local Plan there is a Strategic Development Locations Emissions Analysis Report from the Joint Spatial Plan. This report states that 'it is necessary to meet the area's climate change target of a 50% reduction in carbon emissions by 2035'. We recognise that aviation emissions would be excluded from this target but would expect to see an analysis of the proposed Bristol Airport employment zone. This should contain information on vehicle use generated from it as well as the necessary construction of the site and the buildings. We would also expect to see a comment on car travel by passengers and staff to and from the airport within a report that covers the Local Plan period in order to see how the above target figure is to be met. The PCAA request a similar report for Bristol Airport. We also note that the West of England Joint Transport Study recognises that road transport is one of the largest sources of Carbon Dioxide (CO2) emissions, which are contributing to climate change with road transport representing 29% of the total for the region. The PCAA cannot see how the phase 1 expansion of Bristol Airport to 12 mppa will decrease emissions as there will be no mass transit or light rail but increased congestion on roads surrounding the airport. The PCAA expect the sustainability appraisal to enlighten us on how the climate target is to be met.</p>	

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			<p>The North Somerset Climate Local Commitment Update Report 2018 reflects the West of England adopted targets but fails to mention how Bristol Airport will reduce car travel and thus emissions</p> <p>There is no mention of the UK carbon budgets and how the sustainability appraisal will accommodate the budgets set by government.</p>	
Stowey Sutton Parish Council		21235137//2	<p>To date the only economic report is written by Bristol Airport. An independent report is required that includes the negative impacts on the people's well being and the environment as well as the tourist deficit.</p> <p>We recognise that aviation emissions would be excluded from the 'reduction in carbon emissions by 2035' target but would expect to see an analysis of the proposed Bristol Airport employment zone. This should contain information on vehicle use generated from it as well such as car travel by passengers and staff to and from the airport within a report that covers the Local Plan period in order to see how the above target figure is to be met. The West of England Joint Transport Study recognises that road transport is one of the largest sources of Carbon Dioxide (CO2) emissions, which are contributing to climate change with road transport representing 29% of the total for the region. SSPC expect the sustainability appraisal to demonstrate how the climate target is to be met.</p> <p>There is no mention of the UK carbon budgets and how the sustainability appraisal will accommodate the budgets set by government.</p>	
WENP	West of Engln Nature Partnership	21389665//2	<p>We would challenge the 'moderate' status of the identified issue of the protection, conservation and enhancement of internationally, nationally and locally recognised biodiversity and landscape</p>	

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			<p>character (p17). Given the proximity of the proposed SDLs to such sites, and the requirements for planning to respect such designations, we would consider this issue ‘major’ and certainly of at least the same status as the respective issue of protecting the Green Belt (‘major’).</p> <p>We would encourage a broader reframing of this issue to recognise the importance of connectivity and the support of wider green infrastructure, for example amended as follows: <i>‘Protect, conserve and enhance internationally, nationally and locally recognised biodiversity and landscape character (including the Mendip Hills AONB) and the wider green infrastructure networks that support them’.</i></p>	

<b>Document Part Name</b>	3. Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan document?
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Avon Wildlife Trust	Avon Wildlife Trust	21314273//3	No	
Cleeve Parish Council	Cleeve Parish Council	1045633//3	Few details have been given on the four Park and Ride locations suggested in the Issues and Options document which are to be located on green belt land. There has been no mention of the visual impact if these are developed. CPC believe alternative sites should be found on brown field sites or in quarries where they can be hidden from view.	

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			Important view points in the local landscape, affected by development, should be discussed and agreed by all stakeholders and local community and the ways in which these will be protected should be included in the Local Plan.	
CPRE Avonside	CPRE Avonside, North Somerset District	20273121//4	The cumulative impacts of the whole plan - roads, traffic, housing and airport expansion.	
Environment Agency	Environment Agency	21252257//2	The objectives of the Water Framework Directive must be considered during the planning process and decisions made by the Local Planning Authority should help to achieve these goals.	
Environment Agency	Environment Agency	21252257//3	The water resource requirements of the proposed further development should be considered and early dialogue with water providers should be sought to ensure the demand can be met sustainably in line with NPPF Paragraphs 156 and 162. Policies should ensure that water resources are used efficiently. Adequate provision for treatment and disposal of waste water through environmentally acceptable methods should also be ensured.	
Environment Agency	Environment Agency	21252257//5	Developers should also deliver Net Environmental Gain as per the Defra 25 Year Environment Plan.	
J Gower-Crane		21242753//1	<u>What is a Sustainability Appraisal and will there be one for the Local Plan?</u>	

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
			"Meet the needs of the present" Whose needs, NSC or surrounding less well managed and more populated authority areas? What about local food and economic agricultural security e.g. protecting rural areas, especially for future generations?	
KMH1		21179361//1	<p>Reference is made to the traffic impacts, but the mitigations sound like wishful thinking only, not a real consideration of the problems and strategic options to address this. Reference is made to reduction flood risk because the issue is being dealt with strategically. This is a step in the right direction, but strategic planning won't reduce flood risk alone. Measures need to manage the pathways for flooding and the build resilience into the receptors.</p> <p>Finally pollution is considered only a moderate impact. I doubt existing villages reroute or Bristol City Council will feel that way once the majority of additions trips end up queuing on the A38 and A370, and chuffing out much more jobs and pm10s.</p>	
Lands Improvement		21550017//1	<p><b>2. SUSTAINABILITY APPRAISAL</b></p> <p>2.1 In formulating our response to the Issues and Options consultation we have reviewed and considered the contents of the Sustainability Appraisal (SA) Scoping Report (September 2018).</p> <p>2.2 We note and welcome the issues identified by the Council as set out within Section 2 of the SA recognising the importance of 'meeting communities needs for housing, including affordable housing' and 'pressure on the countryside/greenfield and Green Belt sites from planned development'.</p>	<a href="#">Land Improvements.pdf</a> (784 KB)

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
			<p>2.3 Table 10 identifies that significant housing growth is required over the plan period. It goes on to highlight the need for the Local Plan to secure the delivery of housing in the right places and expresses an understanding that there will be a need to look sequentially at greenfield opportunities, given that opportunities for brownfield sites to contribute are somewhat limited.</p> <p>2.4 It is however disappointing that the Green Belt does not feature within the Sustainability Appraisal Framework Objectives as set out within Table 11. This is somewhat surprising given both the scale of the Green Belt within North Somerset (which covers about 40% of land in North Somerset), the commentary within the wider Issues and Options document and the importance of it to housing delivery within the District. We consider the Objectives should be amended accordingly and suggest the following wording to be inserted to Section 5 Objectives listed on page 50 of the Sustainability Appraisal:</p> <p><i>“Minimise the impact on the Green Belt but where appropriate consider potential revisions to Green Belt boundaries.”</i></p>	
Matt Griffith	Business West Chambers of Commerce and Initiative	21403105//1	<p>We are primarily concerned that the plan is based within a framework that has failed to adequately consider or assess the underpinning sustainability issues for growth, via either a robust sustainability appraisal or green belt review, and that this will lead to unsustainable growth in some locations, with negative impacts on transport congestion, transport connectivity, transport mitigation spending, connections to employment demand and the wider ability of the plan to meet climate change emissions targets as mandated in the Climate Change Act 2008. We set these concerns out below.</p> <p><b>North Somerset and JSP Spatial Weaknesses relating to Sustainability</b></p> <p>We consider the current draft of the JSP, of which the North Somerset Issues and Options paper is based upon, to be falling significantly short of what is required for sustainable development in</p>	

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
			<p>the West of England's plans, particularly the sustainability issues raised by the spatial elements of these plans.</p> <p>We have serious concerns over the approach in the JSP towards Strategic Development Locations in respect of movement and transport infrastructure, both for the Plan period and the implications for continuing growth beyond the Plan period.</p> <p>We consider that the economic prosperity of the region needs to have a spatial plan that:</p> <ul style="list-style-type: none"> <li>? Delivers housing growth as close as possible to the main economic and jobs centres in the region.</li> <li>? Does so in a way that maximises the opportunity for sustainable travel.</li> <li>? Allows as close an alignment as possible between new development and existing sustainable transport infrastructure.</li> <li>? Creates a plan with Strategic Development Locations that have the strongest viability, to allow greatest capture of land value from future development and reduce the risk of either economic shocks or lack of provision of future infrastructure jeopardising delivery.</li> </ul> <p>Many elements of the options set out in this draft paper fail to achieve these goals.</p> <p>We are particularly concerned that the current spatial elements of the plan put development too far away from employment centres and are not well aligned with transport infrastructure and that this cuts against core principles of sustainable development.</p> <p>We believe the current proposals have not been the result of a credible process of assessing the sustainability of spatial locations. We do not believe they have fairly assessed the sustainability impact, nor put forward objectively assessed locations chosen because of their relation to the West of England's current or future employment markets or its current or future transport infrastructure.</p>	

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
			<p>The current JSP does not take satisfactory or consistent account of the core planning principle of achieving sustainable development as required by the NPPF.</p> <p>In particular:</p> <ul style="list-style-type: none"> <li>? The West of England did not conduct a satisfactory or meaningful sustainability appraisal and a sustainability appraisal has not guided the key strategic decisions about spatial locations and allocations. The most recent Consolidated Sustainability Appraisal, published in 2018, finds significant sustainability shortcomings from the JSPs spatial choices, but this has not resulted in any material change to the choices within the JSP or of clearly unsustainable Strategic Development Locations (SDLs).<sup>2</sup></li> <li>? The clear sustainability implications of the Joint Transport Study have failed to properly influence and inform the decisions made by the West of England on proposed spatial locations.</li> <li>? There is a lack of proper consideration given to the connection between areas of housing need and jobs growth identified in the SHMA and the spatial locations proposed in the JSP</li> <li>? The West of England has taken key strategic decisions on spatial location in a way that was predetermined by a decision to protect the green belt and that took little to no account of the need for green belt use to be set in the wider context of achieving sustainable development.</li> </ul> <p>The November 2018 Consolidated Sustainability Appraisal highlights clearly that alternative spatial choices available to the West of England authorities (both Scenario 2: ‘Concentration at Bristol urban area’ and Scenario 3: ‘Transport focussed’) would achieve better sustainability outcomes than the current chosen spatial option of Scenario 1: ‘Protection of the Green Belt’ and that some of the current Strategic Development Locations are not currently, nor can easily be made, sustainable options. <sup>3</sup></p> <p>For example, the November 2018 Consolidate Sustainability Appraisal states:</p> <ul style="list-style-type: none"> <li>? “Scenario 2: Concentration at Bristol urban area and Scenario 3: Transport focussed are likely to have the most positive effects because they include strategic development locations that are well related to Bristol and the larger settlements in the plan area and/or sustainable transport</li> </ul>	

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
			<p>links. Therefore, there would be better access to a range of existing services, facilities and employment opportunities that would reduce the need to travel by car.” (para 4.49)</p> <p>? “Scenario 2: Concentration at Bristol urban area would help to provide new growth at locations which are well related to the more developed locations of the West of England, particularly by sustainable modes of transport. As such, given that these locations provide access to the widest range of services and facilities, a significant positive effect is expected for this approach in relation to SA objectives 1c: access to healthcare facilities, 2c: access to community facilities, 2d: access to educational facilities, and 2e: access to town centre services and facilities.” (para 4.49)</p> <p>The Consolidation Sustainability Appraisal also notes “the more isolated locations of some of the SDLs” (para 4.62) and that “higher levels of car use are likely to occur as more locations with limited sustainable transport links would be developed.” (para 4.48)</p>	
Parish Councils Airport Association	Parish Councils Airport Association	21278401//3	The cumulative impacts need to be assessed that includes Bristol Airport’s proposed development to 2040 of 20 mppa alongside the proposed housing developments in the Local Plan such as the Mendip Spring and Banwell Garden Villages and the Backwell development.	
Stowey Sutton Parish Council		21235137//3	Airport’s proposed development to 2040 of 20 mppa alongside the proposed housing developments in the Local Plan such as the Mendip Spring and Banwell Garden Villages and the Backwell development will all create a cumulative impact which must be assessed.	

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
WENP	West of Englnd Nature Partnership	21389665//3	<p>We welcome the recognition of the importance of accessible good quality green space in improving health and wellbeing across the district. We would strongly support an explicit reference to the role of strategically planned multi-functional green infrastructure in supporting effective delivery of this.</p> <p>We also strongly welcome the recognition of the challenges of air pollution, flooding and carbon emissions, and would similarly welcome explicit reference to how strategically planned multi-functional green infrastructure will enhance delivery, for example through SuDS and the role of trees and other GI in air filtration and carbon sequestration.</p>	

**Document Part Name**

4. Do you agree with the proposed Sustainability Appraisal Framework?

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
Andrew Morrish		20540737//1	<p>I observe that the plan acknowledges the financial aspects of the local community but fails to assess or consider it true wealth/poverty in the context of the normally accepted definition. For example there is no consideration of natural resources or the impact of the fact that considerable transportation passes through the area en route to other areas similarly poor in natural resources and production of resources for local consumption. This considerable burden means the region bears an unfair burden of 'hosting' the needs of others without any material benefit from their transit of the region - they cause real air and noise pollution, considerable time consumption that is unnecessary were alternatives available. There needs to be recognition of this considerable blight and more focus on alleviating this within the timescale of the plan. I see the region as in considerable transport and pollution poverty for which it is inadequately compensated - we need to</p>	

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
			<p>convert the value add of those transit facilities to revenues and benefit local people from them.in ways other than jobs (given the age profile of the local population)</p> <p>I also observe that the plan fails to consider the cultural poverty of the region. This is not about a lack of new cinemas and retail developments, but rather about enabling sustainable community wealth to come from the traditionally accepted definition that a wealthy society supports the arts and cultural opportunities and fosters creative and artistic pursuits. We need to see far greater range and enablement of this aspect of local development. There is a clear squeeze on outdoor sporting facilities which also brings poor long term health considerations whereas more of this type of facility together with enablement of community leadership and volunteering for sport, music, creative and performance arts would start to attract a population make-up which redresses the balance of age in the population towards the national average.</p>	
Avon Wildlife Trust	Avon Wildlife Trust	21314273//4	There is a slightly alarming, what we hope is an error, on page 60, where ‘Development which has adverse impacts on protected species and habitats’ is cited as a Positive effect, where it presumably was intended as a Negative effect.	
C Twine		21525345//1	<p><b>Sustainability Appraisal</b></p> <p>4.1 In preparing our response to the IOP we have reviewed and considered the contents of the Sustainability Appraisal (SA) Scoping Report (September 2018).</p> <p>4.2 We note and welcome the issues identified by the Council as set out within Section 2 of the SA recognising the importance of ‘meeting communities needs for housing, including affordable housing’ and ‘pressure on the countryside/greenfield and Green Belt sites from planned development’.</p>	<a href="#">Mrs Catherine Twine.pdf</a> (1.3 MB)

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
			<p>4.3 Table 10 identifies that significant housing growth is required over the plan period. It goes on to highlight the need for the Local Plan to secure the delivery of housing in the right places and expresses an understanding that there will be a need to look sequentially at greenfield opportunities, given that opportunities for brownfield sites to contribute are somewhat limited.</p> <p>4.4 Given that brownfield opportunities are limited we would suggest that achieving 1,000 dwellings as part of intensification of urban living maybe problematic. As a result, the least sensitive greenfield locations should be prioritised.</p>	
Cleeve Parish Council	Cleeve Parish Council	1045633//4	<p>‘Sustainable development’ has been defined as development that meets the needs of the present without compromising the ability of future generations to meet their own needs. CPC believe that any further development at Bristol Airport will undermine the ability of future generations to meet their own needs. There is a conflict between further economic growth and the health and well being of the local community and the ability of the local and global environment to be resilient to an increase in greenhouse gases. There has to be an acknowledgement with a Scoping Report and Sustainability Appraisal that some development is simply too harmful to be in the Local Plan.</p>	
CPRE Avonside	CPRE Avonside, North Somerset District	20273121//1	<p>The scoping report is remiss in that weight is not given to proposals that will impact on communities and the environment.</p>	
Environment Agency	Environment Agency	21252257//4	<p>Paragraph 5.8 of Table 11: Sustainability Appraisal Framework Objectives should be re-worded from “Minimise harm to, and where possible improve, water quality and availability” to “<i>Prevent</i></p>	

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
			harm to..." to bring it in line with the requirements of the Water Framework Directive to prevent deterioration in water body status.	
Parish Councils Airport Association	Parish Councils Airport Association	21278401//4	<p>The PCAA does not agree with the Sustainability Appraisal Framework as it has only mentioned Bristol Airport three times in the document.</p> <ol style="list-style-type: none"> <li>1. The document states 'It is recognised that planned expansion has the potential to impact a range of environmental (and socio-economic) receptors, and as such an Environmental Impact Assessment will be required to demonstrate how these have been considered and where appropriate mitigated'. The PCAA expect a sustainability scoping report to highlight the range of impacts on residents and the environment over the Plan period as well as an Environmental Impact Assessment (EIA). The EIA should be for the duration of the Local Plan so that residents are aware of potential change to their quality of well being and the local environment. There is no indication of the period that the EIA is to cover. Option 3 and Option 4 would establish the acceptability of growth in principle and indicate a direction for physical expansion, allowing long-term planning to proceed with more certainty. This may give more certainty to Bristol Airport but would create considerable uncertainty for residents particularly if the impacts are not made known.</li> <li>2. Under 'improve air quality and reduce all kinds of pollution' it states 'the Plan can seek to not allocate development sites in areas where any facet of environmental quality is poor'. The PCAA agree with this point and suggest that if the sustainability framework were to investigate further growth at the airport including the road network improvements required it would become evident that it breaks all objectives and criteria of sustainability. And it states 'the Plan can require mitigation measures for developments for certain types of problem, e.g. noise/ light. This is likely to include that associated with planned Bristol Airport expansion.' The PCAA request that the sustainability framework show how there will be respite for residents situated under</li> </ol>	

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
			<p>flights path from ground and air noise received in 2036. This is a major issue as all tranquillity will be lost as the noise environment will bring transformative change within the Plan period.</p> <p>3. <a href="#">WED 010 Updated Habitats Regulations Assessment</a> and appendices (West of England). This report does not mention Bristol Airport once. The PCAA has put in an objection to the West of England JSP claiming that it is non-complaint with the EU Habitats Directive. The JSP takes no account of the cumulative impact of growth at Bristol Airport and the Strategic Development Locations (SDL) in North Somerset. This is despite the fact that North Somerset and Mendip Bats Special Areas of Conservation (SAC) are located within 4km of the Banwell, Backwell, Nailsea and Churchill SDLs and construction of new homes could result in loss, damage or fragmentation of off-site habitat and in recreational pressures. Meanwhile Bristol Airport is located 2 km from the SAC (to the west, at Kingswood) and, in addition, the closest recorded hibernation roost is located at Brockley Combe, approximately 500m to the North of the airport. Thus the SACs lie within 7km of four SDLs: Banwell, Churchill, Nailsea and Backwell with Bristol Airport situated in the middle. This is without additional impacts from road infrastructure for Bristol Airport and the SDL's.</p> <p>Similarly, the cumulative impacts of air pollution through atmospheric nitrogen deposition have not been assessed. This should include the impacts of Bristol Airport and the SDL's on surrounding areas such as SSSI's .</p> <p>The PCAA conclude that the JSP to 2036, which covers the same growth period as Bristol Airport's planned growth to 20 mppa, has again failed to mention or take account of any cumulative environmental impacts of development at the airport. There is an underlying assumption throughout the JSP that the airport will grow, mentioning further growth opportunities through the employment zone and growth outlined in the Joint Transport Plan, with infrastructure improvements justified by an assumption that there will be an increase in air transport movements.</p>	

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
			<p>North Somerset Council should provide the cumulative environmental impacts of these developments in documents supporting the draft North Somerset Local Plan.</p> <p>The PCAA note that no green infrastructure plan has been provided in the JSP, therefore it is not possible for the public to assess the validity of green infrastructure. For example</p> <ul style="list-style-type: none"> <li>• Funding and governance of the green infrastructure to be provided. It should clearly set out in order the accountability and transparency of the green infrastructure plan indicating who is ultimately responsible for the bats and the up keep of green open spaces and dark corridors.</li> <li>• Are the ‘dark corridor’ suggested to be created well before developments commence? Examples of ‘dark corridors’ have not been given or their success in sustaining a population of a rare species.</li> </ul>	
Stowey Sutton Parish Council		21235137//4	<p>SSPC does not agree with the Sustainability Appraisal Framework as it has only mentioned Bristol Airport three times in the document.</p> <p>The <i>Environmental Impact Assessment</i> should be for the duration of the Local Plan so that residents are aware of potential change to their quality of well being and the local environment. There is no indication of the period that the EIA is to cover. Option 3 and Option 4 would establish the acceptability of growth in principle and indicate a direction for physical expansion, allowing long-term planning to proceed with more certainty. This may give more certainty to Bristol Airport but would create considerable uncertainty for residents particularly if the impacts are not made known.</p> <p>2. Under ‘improve air quality and reduce all kinds of pollution’ it states ‘<i>the Plan can seek to not allocate development sites in areas where any facet of environmental quality is</i></p>	

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
			<p><i>poor</i>'. SSPC agree with this point and suggest that if the sustainability framework were to investigate further growth at the airport including the road network improvements required it would become evident that it breaks all objectives and criteria of sustainability. SSPC request that the sustainability framework show how there will be respite for residents situated under flights path from ground and air noise received in 2036.</p>	
WENP	West of Englnd Nature Partnership	21389665//4	<p>We note an apparent error on page 60, where <i>'Development which has adverse impacts on protected species and habitats'</i> is cited as a <i>Positive effect</i>, where it presumably was intended as a <i>Negative effect</i>. Pg 60 – we strongly support the indicators <i>'No. of application approvals that generate significant improvements to biodiversity impacts'</i> and <i>'% of planning approvals likely to lead to a net gain in local biodiversity'</i> and welcome exploration of how you intend to measure such improvements in biodiversity.</p> <p><i>We welcome that the decision-making criteria for sub-objective 5.2 takes a more strategic landscape-scale approach and includes impacts (including severing wildlife corridors) on wider GI networks and opportunities to enhance such networks.</i></p> <p>Pg 64 &amp; 65 – we would strongly welcome an indicator reflecting the incorporation of SuDS in development schemes which deliver multiple benefits for flood management, water quality, biodiversity and recreational value.</p> <p>To strengthen the integration of strategic multi-functional green infrastructure across multiple related themes, we would support an explicit sub-objective for the effective delivery of strategic green infrastructure, with relevant linkages across health and wellbeing, transport, air quality, flooding and carbon emissions.</p>	

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents

**Document Part Name** 5. Is the proposed methodology for the next stages of the Sustainability Appraisal correct?

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
Avon Wildlife Trust	Avon Wildlife Trust	21314273//5	Yes	
Cleeve Parish Council	Cleeve Parish Council	1045633//5	It is only correct if the responses to the Scoping Report are incorporated in the Appraisal and that suggested alternatives are properly evaluated	
CPRE Avonside	CPRE Avonside, North Somerset District	20273121//5	The methodology is insufficient for the volume of development proposed to 2036.	
Hayes Family and Mr Cope		21487905//1	Having studied the SA Scoping Report that supports this Issues and Options consultation, we note that the same effect criteria has been used as that within the JSP SA documentation. We welcome this approach for consistency with the JSP which will ensure that all sites are assessed fairly and objectively.	<a href="#">400 A3 CC 181207 Reps to NLP Issues Options - Land west of the M5 (Part 1 of 2).pdf (5.3 MB)</a>

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
			<p>3.6 However, we would suggest that a more detailed approach to the scoring system is adopted which will provide a clearer method of assessment for each objective. Throughout the SA process for the JSP it is clear that the criteria had to be refined to ensure consistency.</p> <p>3.7 At the current time there is no indication of how a site might score in respect to each criteria and this needs to be rectified for the next stage of the Local Plan preparation. For example, for objective 1.5 – ‘achieving reasonable access to educational facilities’, the current SA process sets out that a site should be assessed in the following way:</p> <p><b><u>Positive Effect</u></b></p> <p><b>Development within reasonable distance of education facilities. Development which adds to capacity of educational facilities, where known capacity issues exist.</b></p> <p><b><u>Negative Effect</u></b></p> <p><b>Development beyond reasonable distance of education facilities. Sites located with access to schools which do not have pupil capacity.</b></p> <p><b><u>Indicators</u></b></p> <p><b>Reasonable distance of: Primary School 800m / Secondary School 1,500m</b></p> <p>3.8 We are of the opinion that this does not provide sufficient criteria by which to assess sites and then rank them on their suitability for development on each objective. The primary issue is that the above extract taken from the scoping report does not reference the scoring system (i.e. ++, +, =, -, --) and therefore in the minimum this needs to be included during the next stage.</p>	

Respondent Name	Respondent Organisation	Comment ID	Comment	Attached documents
			<p>3.9 During the process of the JSP preparation it became apparent that sites were not being ranked consistently on the above criteria and amendments were required to the methodology. We would suggest the following in relation to criteria 1.5 to be more consistent with the JSP methodology:</p> <p><b>++ (Significant Positive) - Site lies within both reasonable distances (800m from Primary School and 1,500m from Secondary School).</b>  <b>+ (Positive) - Site lies within one reasonable distance, and within proximity to another.</b>  <b>= (Neutral) - Site lies just outside of both reasonable distances (i.e. 1,000m for a primary school and 1,700m for a secondary school).</b>  <b>- (Negative) - Site does not lie within either distance but there are reasonable public transport options available.</b>  <b>-- (Significant Negative) - Site does not lie within either distance and there are no reasonable public transport options available.</b>  <b>? (Unknown) - Site lies in proximity of education facilities but there are known capacity issues.</b></p> <p>3.10 Distinguishing the criteria in this way will allow sites to be scored and ranked in a more objective way. A more detailed methodology such as the one set out above is required for each objective to ensure consistency between the assessment of sites.</p> <p>3.11 We would also request that the criteria for each objective is given a number rather than a symbol such as ‘++’; this allows a score to be added up and more meaningful comparisons be drawn between the assessment of sites.</p> <p>3.12 Finally, we consider that it is important to create a ‘baseline’ assessment of sites so they are all scored objectively at the first stage, with no mitigation considered. This is because in our view, some of the sites selected in the JSP process were found more favourable early on because they were assessed with mitigation from the outset, whereas others were not. As the plan progresses</p>	

<b>Respondent Name</b>	<b>Respondent Organisation</b>	<b>Comment ID</b>	<b>Comment</b>	<b>Attached documents</b>
			and evidence is submitted which provides details of mitigation, this will show clearly how the sustainability objectives have been considered and allows the SA to inform the selection of sites and plan process.	
Parish Councils Airport Association	Parish Councils Airport Association	21278401//5	From the above points it is clear that the proposed methodology is unacceptable as it excludes the detrimental impacts of airport expansion on residents and the environment to 2036.	
Stowey Sutton Parish Council		21235137//5	From the above points it is clear that the proposed methodology is unacceptable as it excludes the detrimental impacts of airport expansion on residents and the environment to 2036.	
WENP	West of Englnd Nature Partnership	21389665//5	We consider the proposed approach to be appropriate.	

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