
Report on Questionnaire Answers

Questionnaire: Local Plan 2020

Question: [Q37] Phase 1 General or Other Comments

Respondent Name	User Response: Text	Response Created
Ashfield Land	<p>2.4 Thus, a fresh approach to the distribution of development, in line with a high-level Spatial Strategy, based on sound evidence is required. This requires the West of England's Combined Authority (WECA) Spatial Development Strategy (SDS) to proceed with its current timetable and set such a Spatial Strategy in advance of the Local Plan selecting sites to meet the Council's housing and employment needs. The SDS must also determine how Bristol's unmet housing need will be addressed, with it almost certain that the large uplifts it has been dealt as part of the new Standard Method cannot be met within its administrative boundaries, and therefore the surrounding Authorities must determine how this unmet need will be allocated across the wider WoE region.</p> <p>2.5 Currently it is anticipated that the SDS will be published in draft for consultation 'in the second half of 2021' with Phase 2 of the Local Plan, which will set out potential options for growth, protection and site proposals, scheduled to be subject to consultation at the end of the year.</p> <p>2.6 As it is essential that the Local Plan is informed by a regional Spatial Strategy if there is any slippage in the SDS programme the Local Plan will need to be delayed allowing for the Spatial Strategy for the region to be defined. If this does not happen then the previous mistakes relating to the JSP will be repeated, with sites selected and then a Spatial Strategy prepared that will either undermine those selected, or be prepared in a way that supports a predetermined strategy. We urge the Council to avoid this happening again as it is in no one's interest that these plans be delayed further, given the time that has been lost because of the withdrawal of the JSP.</p>	31 Mar 2021
ATA Estates (Longwell Green) LLP and Sovereign Housing Associaton	<p>The Context to this Local Plan review is an important issue and should be highlighted. Paragraph 10.10 of the Adopted Core Strategy (2013) confirmed that 'To ensure sufficient land is made available to meet housing needs to the end of the Plan period the Council will undertake a review of the Core Strategy/Local Plan to be completed before the end of 2018.'</p> <p>As the Joint Spatial Plan (JSP) has been withdrawn, the earlier Local Plan review in 2018 did not progress. Consultation on the new SDS has yet to commence and as such there is a pressing need to adopt a new Local Plan as soon as possible. Without this in place speculative development in less sustainable locations could occur and delays in the delivery of jobs and houses will continue to exacerbate the affordability gap.</p> <p>The development industry was generally supportive of the JSP as a mechanism for guiding new development, allowing Local Plan reviews across the West of England to be completed and providing certainty. Unfortunately, the approach taken in preparing the Plan was flawed with a general feeling that the evidence base had not been properly taken into account. Moving forward it is critical that lessons are learned so that the overall strategy for the area can be supported by stakeholders and rapid progress can be made in relation to a new policy framework for the area.</p>	06 Apr 2021

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	<p>With such a wide range of stated issues there will inevitably be conflict. Therefore, the Council will need to very clearly communicate how the identification of issues has led to the stated Plan priorities.</p> <p>Whilst the Local Plan Phase 1 Consultation Document considers a wide range of topics it does not consider these in combination by bringing them together in a single strategy. In accordance with the NPPF the presumption in favour of sustainable development should be a fundamental aspect of the Plan's focus. This will ensure that new development is located in the most sustainable places, in close proximity to complementary uses (i.e. houses close to jobs, shops and community infrastructure) with the least environmental impact. Whilst Climate Change and other environmental concerns are significant issues to consider the Plan should identify and provide for objectively assessed needs (NPPG Paragraph: 036 Reference ID: 61-036-20190723).</p> <p>Linked to the 'presumption' the inter relationship between South Gloucestershire and Bristol should also be included as a fundamental issue. The concentration of jobs, facilities and services in Bristol cannot be overlooked. Locating development as close as possible to Bristol is likely to result in the most sustainable form of development, subject to relevant environmental constraints and designations.</p>	
<p>Barwood Development Securities & The North West Thornbury Landowner Consortium</p>	<p>Plan Period:</p> <p>We have very significant concerns regarding the proposed Plan period of 2023 – 2038.</p> <p>First, our understanding is that the SDS would be based on a Plan period which runs from 2021 - 2041. A lack of consistency between these two Plan period will unnecessarily complicate matters. Indeed, it is unclear how the two Plans will align; notably how any deficit between 2021 - 2023 would be dealt with, and why the new Local Plan's Plan period finishes three years before the SDS.</p> <p>If the intention is not to have two aligned Plan periods, then it is noted that the housing requirement for the SDS (if based at 2020) would be out of date within just two years of the adoption of the new Local Plan – thus likely to be before any of the large strategic sites deliver a single unit.</p> <p>Second, we note that the timelines set out on p13 indicate the new Local Plan would be adopted in December 2023. This would give just a 15 year Plan period – the minimum requirement expressed in the NPPF paragraph 22. We recognise that the consultation document indicates that the timeline may change, and from our experience, it is only likely to be delayed further (we understand the SDS is already subject to a 6 month delay). It would be more efficient and transparent to extend the Plan period now, and in so doing avoid the risk that this needs to be changed later if the SDS and new Local Plan are delayed.</p>	<p>12 Apr 2021</p>
<p>Bloor Homes</p>	<p>Plan Period:</p> <p>1.4 We have a significant concern in regard to the proposed Plan period – 2023 - 2038. The NPPF requires that adopted Plans should have a 15 year Plan period (paragraph 22); and the proposed timelines at p13 of the consultation document provide no ability</p>	<p>01 Apr 2021</p>

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	<p>for any slippage in the Local Plan process – both in regard to the SDS, and the nLP itself. This is a significant concern; with Plan-making frequently taking longer than originally anticipated. Providing a longer Plan period at the outset will ensure that any delays in the Local Plan process do not necessitate more substantive amendments, and the associated delays, at a later stage.</p> <p>1.5 It is also unclear how the Plan period relates to the SDS; which we had understood relates to a 20 year Plan period. The Plan period of the two levels of Plans should align, or if there is a difference, then it must be clear how difference in the Plan period, and associated housing and employment needs, are addressed between the two Plans.</p> <p>Wider Development Context:</p> <p>1.6 Notwithstanding the wider sub-regional planning context, there are changes at a national level which will come to the fore over the coming few years, and will influence the nLP as it progresses.</p> <p>1.7 We support the decision to proceed with this consultation in light of the national planning policy changes mooted in the Planning White Paper (PWP). It will also be necessary for the nLP to address the changing legislation around the Future Homes Standard, First Homes, and Biodiversity net gain (discussed further below); and the emerging national changes in regard to design. A number of these national changes will become clearer over the coming months, and as such, the next stage of the nLP will need to be informed by them.</p>	
Charterhouse Strategic Land (1) Ltd	<p>9. Generally, the Issues and Options document is well structured and logical. Some form of referencing for page numbers, paragraphs and plans would have been helpful.</p> <p>Plan Period:</p> <p>10. With the on-going changes to the planning system at the national level, it is welcomed that the Council is progressing the Local Plan and sharing its early thoughts on challenges issues and the potential approaches it will consider.</p> <p>11. From the outset the Council suggests adoption of the Local Plan by Autumn 2023. A Plan period to 2038 is suggested. This is compliant with the Framework's requirement of a Plan period of 15 years. However, we would suggest that an end date of 2040 may be appropriate to accommodate any potential slippage.</p>	07 Apr 2021
David Price	Property at the junction of Pincots Lane & Sodbury Road.	25 Mar 2021
Estrans Ltd	<p>The Consultation sets out that the Standard Methodology will be used to calculate the housing requirement for the District over the Plan period. That currently amounts to 1,412 dwellings per annum or 21,180 new homes over the 15 year Plan period (2023 to 2038).</p> <p>It also correctly recognises that in preparing a two tier development plan, it will be necessary to consider the needs of the wider sub-region and identify a total number of new homes required within the SDS. Changes to the Standard Methodology will impact on and significantly increase the number of new homes required in Bristol City,</p>	04 May 2021

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	<p>which is already constrained, to 3,196 dpa. The requirement for Bath & North East Somerset is 648 dpa. In total the SDS will need to include provision to distribute 5,256 dpa or 105,120 dwellings over a 20 year Plan period (which is identified for the SDS). This highlights that the development needs of the sub-region are significant and, inevitably, some of the Bristol requirement will need to be redistributed elsewhere in the sub region, including South Gloucestershire.</p>	
<p>James Carpenter - Falfield Parish Council</p>	<p>The Parish Council would like to thank the Strategic Planning Policy and Specialist Advice Team for allowing extra time for the Parish Council to submit their responses to these consultations documents.</p> <p>Councillors realise that it is important that these issues need to be addressed however the consultation document is far too long for the average resident of South Gloucestershire to read and understand. As Parish Councillors who give their time on a voluntary basis to serve their community we feel that a summary document should form part of any consultation and that a least one hardcopy is supplied free of charge.</p> <p>Councillors also felt that the four online briefings arranged between 30th November and 4th of December 2020 following the publishing of the consultation on 27th November gave little time for the consultation document to be studied. It would have been more beneficial to have held these later in December 2020 with additional briefings taking place during January & February 2021.</p>	<p>14 Apr 2021</p>
<p>Liz Pickering - Department for Education</p>	<p>General Comments:</p> <p>4. The National Planning Policy Framework (NPPF) advises that Local Planning Authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of School places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter Schools to widen choice in education (para 94).</p> <p>5. The Department supports the principle of South Gloucestershire Council safeguarding land for the provision of new Schools to meet Government planning policy objectives as set out in paragraph 94 of the NPPF. When new Schools are developed, Local Authorities should also seek to safeguard land for any future expansion of new Schools where demand indicates this might be necessary, in accordance with Planning Practice Guidance and DfE guidance on securing developer contributions for education[1]. We would be happy to share examples of best practice.</p> <p>6. The Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development[2] (2011) which sets out the Government's commitment to support the development of state-funded Schools and their delivery through the planning system.</p> <p>7. In light of the above and the Duty to Co-operate on strategic priorities such as community infrastructure (NPPF para 24 - 27)[3], DfE encourages close working with Local Authorities during all stages of planning policy development to help guide the development of new School infrastructure and to meet the predicted demand for Primary and Secondary School places. Please add the Department to your list of</p>	<p>26 Mar 2021</p>

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	<p>relevant organisations with which you engage in preparation of the Plan.</p> <p>[1] https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth</p> <p>[2] https://www.gov.uk/government/publications/national-planning-policy-framework--2</p> <p>[3] NPPF paragraph 24 - 27 specifies that this collaborative working should include infrastructure providers.</p>	
Michael Wilberforce - Bristol City Council	<p>Bristol City Council notes building block 2 ‘expanding our main urban areas through small or large urban extensions’ and references throughout the consultation document to investigating land in the Green Belt, although it is acknowledged that area or site specific proposals have yet to be presented.</p> <p>The comments made above in relation to development in the existing urban area also apply in relation to any proposals for urban extensions, with the addition of the following:</p> <ul style="list-style-type: none"> • Community involvement - Any identification of land for large scale development in Green Belt locations close to Bristol’s administrative boundaries would have an impact on adjoining communities within Bristol. In particular the Green Belt lies close to Bristol’s boundary in the Henbury, Frenchay, Conham and Brislington areas. To date these communities are unlikely to have been actively engaged in the preparation of the South Gloucestershire Local Plan. As the Plan progresses, the views of these communities will need to be effectively engaged if development is to be considered in these areas. 	26 Mar 2021
Midland Commercial	<p>4.1 We welcome the clear accessible format of the consultation document in setting out the context as an introduction to the key issues that the emerging Local Plan will need to address.</p>	26 Apr 2021
Mr. A. D. England	<ul style="list-style-type: none"> • Within the scope of these representations, we broadly support the Issues, Potential Priorities, Building Blocks and Guiding Principles identified by the Council. However, the consultation document does not go far enough in acknowledging the role South Gloucestershire will need to play to meet Bristol’s significant unmet needs. The resultant emerging Spatial Strategy, site selection and portfolio of allocations proposed (which should be of all scales; large, medium and small) will be key to ensuring the soundness of the Plan; <p>2.0 GENERAL COMMENT:</p> <p>2.1 This consultation is on Phase 1 of the Local Plan 2020. Whilst the Phase 1 document refers to the October 2020 standard methodology figure of 1,412 new homes a year in South Gloucestershire, we note that a further Phase 2 consultation due to take place late in 2021 once the WECA SDS has established the amount of new homes and jobs to be accommodated within the District. The testing of the relevant Building Blocks to inform the Spatial Strategy and site selection should not be undertaken until the level of growth has been set through the SDS. In this respect, Paragraph 26 of the NPPF states that “effective and on-going joint working between strategic policy-</p>	29 Mar 2021

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	<p>making Authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.”</p> <p>2.2 It is imperative however that a mechanism is incorporated into the Local Plan 2020 to provide adequate flexibility for the Plan to come forward and be prepared in a positive manner with an appropriate level of growth (accommodating Bristol’s unmet needs) should the SDS be delayed. Any delays to the SDS’ preparation and associated delays to the Local Plan 2020 would not be in the interests of the Council, the local community or development industry and therefore appropriate flexibility to allow the Local Plan to progress if the SDS is delayed should be built in.</p>	
<p>Nicholas Small - Stagecoach West</p>	<p>2. The Role of the Plan and its relationship with higher-level policy:</p> <p>Stagecoach is somewhat perplexed that the Council is embarking on this Local Plan review before any real progress has been made preparing the Combined Authority’s Mayoral Spatial Development Strategy (SDS) which is being named the West of England Joint Spatial Framework (JSF).</p> <p>We well recognise that the Council needs to have an up-to-date Local Plan in place at the earliest opportunity, and the current review was set up on a time-line to reflect and respond to the adoption of higher level strategic policy for the wider West of England area that was emerging up to 2019 in the form of the West of England Joint Spatial Plan (JSP). The need to withdraw this Plan following its Examination in Public means that the sequential preparation of local policy under a strategic spatial plan is a great deal more challenging.</p> <p>The reprise of the strategic spatial plan by WECA as a Mayoral SDS, rather than on a more informal consortium basis, also reflects the evolution of local Government competencies since April 2020, with the CA mayor now having been granted certain spatial planning powers. Importantly, these sit alongside most of those related to transport. This means that the relevant Authorities do not start in the same place as when the JSP was initiated, in many important regards, not least that the Unitary Authorities are no longer the Local Transport and Local Highways Authorities.</p> <p>A great many of the most important issues and questions the statutory development plan as a whole for South Gloucestershire must address, can only be resolved by the JSF – not least the actual quantum of development that this Plan must accommodate. In addition, the powers to plan and execute transport strategies and projects has largely moved away from the Council to WECA.</p> <p>This being the case, we consider that in many regards the current consultation is rather premature.</p> <p>2.1. The development quantum:</p> <p>While during the currency of this consultation MHCLG has confirmed its intended position with Standard Methodology for the future, and has reaffirmed a level of endogenous growth that the Plan must seek to accommodate, at just over 1,400 dwellings per annum, it is still far from clear whether the Duty to Co-operate to fill unmet need from adjoining Authorities set out in the 2012 Localism Act will bind the</p>	<p>01 Mar 2021</p>

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	<p>Council as the Plan progresses.</p> <p>It is already abundantly clear, not least from the process of producing the Joint Spatial Plan, that Bristol City Council will not be able to accommodate all its needs within its boundaries, and neither will Bath and North East Somerset (BANES). The Government has, with no warning of any kind, elevated the City Council’s target by 35%, and while it has also said that it intends for all this to be provided within the City boundary, it is quite evident that the opportunities to meet this target within the Bristol BUA have in no way changed. In fact, one of the great weaknesses of the JSP strategy was the minimal evidence of what the credibly deliverable urban capacity of the City or indeed the wider existing built-up areas including those within South Gloucestershire, actually was or is likely to be at this writing.</p> <p>We have great sympathy with both SGC and the other WECA Authorities who are presented with a further set of challenges in establishing the housing quantum to be provided within each Plan, that go well beyond “arguments over the development quantum” that Government claims it is trying to obviate.</p> <p>Nevertheless it seems prudent to assume that at least a similar level of Bristol’s unmet need will need to be accommodated within the SGC area as was assumed in the JSP, and that the JSF will as a result of the 35% core city uplift, will be looking at a rather more challenging quantum for identification over the Plan period than the JSP had been.</p> <p>It will be exceptionally difficult for the South Gloucestershire Plan to progress very far until this matter has been established to appoint where is a figure that can be credibly relied on as being soundly based.</p>	
Oliver Lowe - Highways England	<p>We would highlight that a significant number of trips on the SRN in South Gloucestershire are made by commuters from other areas, not just South Gloucestershire residents, for example pass-through trips from Stroud District to the wider Bristol conurbation and vice versa. The Local Plan should therefore consider, through the Duty to Co-operate requirements, the need for any transport infrastructure in this context.</p> <p>The consultation document notes that the Joint Local Transport Plan (JLTP) includes strategic rail, Public Transport, walking, cycling and highway capacity schemes that will need to be incorporated into the Local Plan. The JLTP includes identifies the need for an improvement scheme such as M5 J14, as well as proposals for a new M4 J18a South of Yate. Highways England was engaged on the production of the WoE JLTP and its contents. Noting that JLTP used as a foundation the spatial distribution of new development proposed in the Joint Strategic Plan no longer being progressed, at the time Highways England was content that the contents of the JLTP was an appropriate response to the existing and predicted pressures on the SRN.</p> <p>Linked to the above, the consultation document notes that transport schemes and policy are developed in partnership with WECA, neighbouring Local Authorities and delivery partners through the JLTP.</p> <p>Highways England considers ourselves to be a delivery partner and, given the potential</p>	16 Mar 2021

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	implications of the Local Plan on the SRN, would welcome future Local Plan consultations documents acknowledging us as such.	
Redrow Homes (SW)	6.1 We are pleased to see the SGC Local Plan being progressed and it appears that the documents prepared have gone back to the beginning. We urge the Authority to not be tempted to fall back into making the same mistakes as that within the JSP and ensures that the evidence base underpins the most sustainable strategy and in particular meets Climate Change goals.	29 Apr 2021
Tom Sheppard	<p>I'd also like to add that comments submitted by Cromhall Parish Council to date proposing a new settlement boundary to Heathend were done without consultation to the Parish or specifically residents of Heathend.</p> <p>I live in Heathend and would like to make some comments having only recently been made aware of reps made by the Parish Council.</p> <p>First of all the suggested boundary changes, to include Heathend within a new settlement boundary hasn't been consulted on with residents within the Parish.</p> <p>Heathend is detached from the main settlement of Cromhall. It is remote from facilities, School, shop and Church and therefore much less sustainable than Cromhall itself.</p> <p>I don't think a new boundary is required.</p> <p>The plans, which suggested a new settlement/development boundary for Heathend, have been drawn using out of date mapping, which doesn't include the recent development at the Burltons.</p> <p>The boundary includes areas of land that are not residential, fields, paddocks and open countryside, that aren't appropriate to be included in a settlement boundary. Large gardens are also included, that in due course would be developed.</p> <p>In previous sustainability assessments the main settlement of Cromhall scored relatively low, so to extend a boundary some 1km from the core of the village seems inappropriate and unnecessary.</p> <p>By introducing a new or altered settlement boundary this would define new development limits, so anything within the boundary could be considered acceptable for development. You'll appreciate the remoteness of Heathend to facilities etc, so doesn't make sense to categorise it at a level the same as the main part of the village.</p> <p>The suggested boundary at Heathend contains lots of land which is currently undeveloped, outside of residential curtilage etc and is open countryside. To include this land within a new settlement boundary would potentially lead to unsustainable development.</p> <p>I don't disagree that a settlement boundary would in some ways be helpful, but it needs to be drawn to closely following developed land, existing residential curtilage, so that development can be suitably managed. In fact it is not uncommon for farms, paddocks</p>	07 Jul 2021

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	<p>that are associated to existing homes and even gardens to be located outside of settlement boundaries, to ensure the openness of locations like Heathend are maintained. Of particular concern is the inclusion of paddocks, fields and long gardens in and around Cowship Lane.</p>	
Vistry Group	<p>Section 1: What must the Local Plan 2020 do?</p> <p>Before embarking on the preparation of the SGLP the Council must first have a clear understanding of what the Local Plan should achieve. Section 1 of the Consultation Document advises that The Local Plan 2020 will cover a 15-year period and establish a new growth strategy for the delivery of homes, jobs, and infrastructure. While this is the role of a single tier Local Plan, the circumstances influencing the scope and content of the Local Plan in South Gloucestershire are different because the Local Authority falls within the West of England Combined Authority (WECA) area. Strategic planning policies governing the strategy for growth in the period to 2040 will be contained within the Mayor's Spatial Development Strategy (SDS), which will, when adopted, form the upper tier of the Development Plan guiding development across the Combined Authority area. The starting point for the SGLP is, therefore, the SDS.</p> <p>The NPPF provides guidance and sets out the scope of strategic and non-strategic policies forming part of a Development Plan. With regard to strategic policies, Paragraph 17 of the NPPF confirms that the development plan must include strategic policies to address each Local Planning Authority's priorities for the development and use of land in its area - these strategic policies can be produced in different ways, depending on the issues and opportunities facing each area. They can be contained in:</p> <ul style="list-style-type: none"> a) Joint or individual Local Plans, produced by Authorities working together or independently (and which may also contain non-strategic policies); and/or b) A spatial development strategy produced by an elected Mayor or Combined Authority, where Plan-making powers have been conferred. <p>The latter is the case in South Gloucestershire.</p> <p>The West of England Combined Authority Order 2017 requires WECA to prepare and publish a SDS for the area and authorises a number of functions relating to the preparation and publication of a SDS that should be followed[1]. The scope and content of the SDS is prescribed by The Combined Authorities (Spatial Development Strategy) Regulations 2018 (as amended) (SDS Regulations) - the legislation requires the SDS to include the Mayor's general policies in respect of the development and use of land in the relevant area, and statements dealing with general spatial development aspects of the Mayor's other policies and proposals. The SDS deals only with matters which are of strategic importance and must include reasoned justification and a key diagram. It may also contain inset diagrams to a larger scale illustrating the Mayor's general policies affecting specific parts of the area covered by the SDS. The SDS may also include diagrams in addition to the key diagram and the inset diagram, which identify strategic allocations; such diagrams may be on a map base albeit it is understood that WECA is proceeding at this stage on the basis that SDS will not make site allocations.</p>	06 May 2021

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	<p>[1] In accordance with the Greater London Authority Act 1999.</p> <p>As the strategic tier of the Development Plan, it is the role of the SDS to set the strategic policies for the area which, in accordance with paragraph 20 of the NPPF, should contain the overall strategy for the pattern, scale and quality of development, and make sufficient provision for:</p> <p>a) Housing (including affordable housing), employment, retail, leisure and other commercial development;</p> <p>b) Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);</p> <p>c) Community facilities (such as health, education and cultural infrastructure); and</p> <p>d) Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address Climate Change mitigation and adaptation.</p> <p>The role of the SGLP is to set out the more detailed non-strategic policies for specific areas, neighbourhoods and types of development. In accordance with paragraph 28 of the NPPF, this can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving, and enhancing the natural and historic environment, and setting out other development management policies. While the SGLP may also include policies that are strategic in nature, these must be in entirely in conformity with the SDS, which serves as the upper tier in the Development Plan. Any tension between the SDS and SGLP will fundamentally undermine the purpose of the SDS, which is to set the overarching strategy for growth across the sub-region in a co-ordinated and holistic way.</p> <p>According to the ‘West of England Joint working on Strategic Planning Memorandum of Understanding’ (June 2020) the SDS will set out the shared strategic priorities. Key cross boundary strategic themes that will shape the SDS are summarised within the outline Statement of Common Ground (SOCG) (September 2020) signed by the WECA Authorities and North Somerset informing the SDS preparation, which include (but are not limited to): Carbon emissions and air quality; Health inequality; Housing; Employment; Green Belt; Development Quality and Transport; and Green Infrastructure. Evidence base documents relating to these matters have been commissioned by WECA and will inform the preparation of the SDS but are not yet available to view in full.</p> <p>The SGLP Phase 1 Consultation Document refers to numerous matters and issues that should properly be addressed at the strategic level via the SDS, not in isolation as part of the preparation of the SGLP. If the SDS is to succeed in supporting economic recovery and delivering a co-ordinated and sustainable response to the substantial housing need in the sub-region it is crucial that issues of a strategic nature are dealt with by WECA, and are supported by the necessary evidence base that informs the overarching growth strategy. It is paramount that the SGLP strategic priorities align</p>	

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	<p>with the SDS to address the key cross boundary themes and issues identified. Any deviation from SDS would undermine the combined objectives of the WECA Authorities and strategic function of the SDS.</p> <p>It is not appropriate for each constituent Authority to establish its own independent Spatial Strategy in isolation of the SDS process – in this regard the West of England Authorities must learn from the mistakes highlighted during the preparation of the Joint Spatial Plan, notably the need for the spatial and locational strategy to be approached holistically having regard to all reasonable alternatives. This is even more pertinent in the West of England where Green Belt release in the sub-region is inevitably to be considered as a component of the growth strategy. Given the nature of the sub-region and the significant housing overspill that will arise from Bristol City there is a need to assess options in a joined-up manner.</p> <p>With regard to the Plan period referenced in the Consultation Document, it is concerning that the Council intends to plan for the minimum 15-year period required by the NPPF with an identified Plan period of 2023 - 2038. This period does not align with the SDS, which will have a 20-year life span. There is a fundamental disconnect between the SDS and SGLP which should be rectified now to ensure that the two Plans align to deliver the strategic objectives for the sub-region (see further comments under Section 4). It should also be noted that draft proposed changes to the NPPF (2021)[2] state that ‘where larger scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.’</p> <p>[2] National Planning Policy Framework and National Model Design Code: consultation proposals January 2021.</p>	

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