

North Somerset Council

Report to the Executive Committee

Date of Meeting: 7 September 2022

Subject of Report: Local Plan 2038 update following consultation on Preferred Options

Town or Parish: All

Member Presenting: Councillor Mark Canniford, Executive Member for Placemaking and Economy

Key Decision: No

Reason: Report is for information and discussion

Recommendations

- To consider the consultation response to the Local Plan Preferred Options Consultation and the comments of Place Scrutiny.
- To consider the main themes and issues to be addressed in the next stage of the Local Plan 2038.
- To confirm the approach to be taken and the plan timetable.

1. Summary of Report

- 1.1 Consultation on the Local Plan 2038 [Preferred Options](#) took place between 14 March and 29 April 2022. This report summarises the principal issues which emerged from the consultation and the implications for the next stage of plan making. These were considered by the Place Policy and Scrutiny Panel on 13 July and the draft minutes of the meeting included in this report.
- 1.2 The key challenge at the next stage of plan making is the identification of the housing shortfall in relation to the government's standard method. Accommodating this scale of growth given the constraints in North Somerset is extremely challenging, and there is also uncertainty around anticipated national planning changes.

2. Policy

- 2.1 The Local Plan will provide the land use framework for the delivery of the key aims and priorities of the Corporate Plan, including measures to help address the climate emergency and nature emergency.
- 2.2 The planning system is plan-led and local authorities must prepare up-to-date local plans to provide a positive vision for the future of the area; a framework for addressing housing needs, and other economic, social and environmental priorities and a platform for local people to help shape their surroundings.

- 2.3 Local Plans must be kept up to date and correctly reflect government guidance. The existing Local Plan which consists of the Core Strategy, Site Allocations Plan and Development Management Plan covers the period to 2026. This is currently being reviewed and updated. The new Local Plan will cover a fifteen-year time frame from 2023 - 2038.
- 2.4 Government has announced a review of national policy as part of the Levelling Up and Regeneration Bill introduced into Parliament on 11th May. A prospectus on revisions to the National Planning Policy Framework (NPPF) was expected in July but is now anticipated in September.

3. Details

- 3.1 Local Plan preparation is a statutory process requiring several stages of consultation and engagement. The process for drafting a new Local Plan for North Somerset was launched in March 2020. Later that year two high-level consultations were undertaken focusing on the challenges the Local Plan would have to address (Challenges for the Future) and the broad spatial options (Choices for the Future).
- 3.2 The response to the Challenges and Choices consultations and an assessment of emerging evidence enabled the formulation of a preferred spatial strategy which would provide the framework for the next stage. This was agreed by the Executive on 28 April 2021. The Preferred Option document was subsequently prepared in accordance with the agreed spatial strategy for consultation along with supporting documents which provided the evidence and justification for the policies and allocations within the emerging plan. It did not plan at that stage to seek to allocate land for the Council's full housing requirement but sought views on how that requirement might be met.
- 3.3 The Local Plan Preferred Options consultation document represented the first full draft of the new Local Plan. It contained:
- **Strategic Policies:** These are expected to set out the overall strategy for the pattern, scale and design quality of places and make sufficient provision for housing, employment and other uses, infrastructure, community facilities, conservation and the enhancement of the built and historic environment and address climate change and mitigation. These are high level policies which provide the framework for more detailed policies in the plan and for neighbourhood plans.
 - **Locational Policies:** These comprise land use allocations and other designations which are identified on the Policies Map.
 - **Development Policies:** These are the detailed development management policies which cover a wide range of issues including design, residential infilling, climate change, net zero construction, renewable energy, drainage, transport, economic development, town centres, green infrastructure, affordable housing, rural development and infrastructure delivery.

Consultation statement

- 3.4 The Preferred Options Consultation Statement has been published and describes how the engagement took place in terms of the exhibitions and other events, publicity (including press and social media) and consultation tools. Over 4000 comments were received from over 700 respondents. Around 500 people responded online whilst around 200 responded by email. Respondents included town and parish councils, individuals, developers or their agents, stakeholders such as Bristol Airport, Bristol Port, Bristol University, organisations such as the Woodland Trust and CPRE, local community groups such as Backwell Residents Association (BRA) and Churchill and Langford Residents Action Group (CALRAG), neighbouring authorities such as Bristol City Council and statutory consultees such as the Environment Agency, Historic England, English Highways and Natural England.
- 3.6 The responses were summarised in the report to the Place Policy and Scrutiny Panel on 13 July. Most comments (1,555) were submitted in relation to the Strategic Policies. The following summarises the main concerns and issues raised in relation to strategic policies as summarised in the Consultation Statement. There was quite a bit of overlap in relation to comments received on these policies given the interrelationships between them.

SP1: Sustainable development

There was broad support for the high level principles contained in the policy but some concern regarding how effective in practice they would be in terms of providing clear guidance and how they are reflected in the other policies and proposed allocations set out in the plan. While the delivery of sustainable development was accepted as being a fundamental principle, some felt that as this was already set out in government guidance, the policy was unnecessary.

Some representations considered that the policy should be redrafted to be more clearly related to the other policies and the requirements made more specific rather than being presented as a checklist. Others felt that the policy should be strengthened to emphasise the climate emergency and commitment to net zero commitment.

There was quite a bit of overlap between comments received to this and several other strategic policies, particularly SP2 climate change, SP3 spatial strategy and SP8 housing which demonstrated some confusion between the scope of each. A number of respondents used the policy to demonstrate how in their view it was not being consistently applied in terms of, for example, development in villages (especially Backwell), use of Green Belt and green field sites, and implications for car use and biodiversity.

SP2: Climate change

There was a clear distinction between those representations who supported the approach and felt that it should go further, and those who expressed concerns about its deliverability. Supporters of the policy emphasised the imperative to act on climate change, the importance of the net zero and links to the nature emergency and how this should lead to a fundamental reappraisal of the form and location of new development. Others, particularly from the development industry raised concerns about the lack of viability evidence and how this might impact on delivery. Others questioned the net zero approach and the need for local standards and whether the policy was justified given changes to building regulations. There were concerns that the policy provided insufficient flexibility and also that the policy requirements lacked detail.

SP3: Spatial strategy

Policy SP3 sets out the broad framework for where development should be located and the themes covered often overlap with other strategic policy areas. In respect of those respondents who indicated that they supported the policy with amendments, there were a range of views submitted in terms of the degree of support for the strategy and which aspects they had issues with. There was often a dichotomy of views presented on the principal objectives of the strategy depending on the perspective of the respondent, with largely the local community view contrasting with the development industry promoting sites.

Overall the spatial strategy was broadly supported as the framework for delivering sustainable development. The prioritisation of previously developed sites, urban sites and optimising densities were supported, as was the principle of wherever possible locating development which was easily accessible to services, facilities, jobs and good public transport. There was a general recognition that the scale of development at villages and in the rural areas should be relatively less, and that Green Belt should be considered last.

However, while there was broad high-level agreement on the principles, there was a wide range of views on how these should be interpreted in practice. In particular, what was the appropriate scale and location of development in villages and whether this could or should be restricted to 'local community needs', whether Green Belt release was appropriate and the scale and type of development which might be acceptable, and whether development on land at risk of flooding (with appropriate mitigation) was preferable to Green Belt.

These issues are bound up with the scale of the housing challenge facing North Somerset. The Preferred Options acknowledged that there was a significant shortfall in relation to the standard method target and much of the response from the development industry in particular was in relation to ways of increasing capacity.

SP6: Villages and rural areas

There was concern from many communities that the approach to development in rural areas was too permissive and was in conflict with the broader strategic principles relating to sustainable development and climate emergency. Many responses related to the need to resist speculative development pressures in villages and there was concern that the proposed allocations in the plan were inconsistent with the policy as set out in SP6. However, there was significant support from communities and residents for the new policy approach which no longer allows development sites to come forward adjacent to settlement boundaries. It was felt this give communities more certainty regarding what development will be coming forward and stop speculative development.

In contrast many developer representations felt the approach was too restrictive and that there should be more flexibility such as by retaining the approach which allowed development adjacent to settlement boundaries. Others felt we should be encouraging growth at sustainable villages to provide deliverable housing sites to meet local needs and to support local facilities.

SP7: Green Belt

The policy received strong views both for and against the use of Green Belt land. On the one hand there were representations questioning whether all available, achievable, and sustainable development options on non-Green Belt land had been fully considered, especially brownfield land, higher densities and areas at risk of

flooding (with suitable mitigation). It was not clear that exceptional circumstances had been demonstrated and that the proposed allocations had identified the most sustainable locations. Some argued that Green Belt release should be opposed given the climate change and nature emergencies and that these sites were important for reasons such as wellbeing and the retention of green infrastructure.

Others took the view that it was appropriate to use Green Belt. Some argued that using Green Belt should be sequentially preferable to development elsewhere, and several alternative Green Belt locations were proposed for development. These included employment sites such as at the Airport and Port.

There was a suggestion that the land lost should be replaced by new Green Belt, possibly extending to the Mendip Hills AONB, but also the view that if you didn't make allocations in the Green Belt, then there was no need to propose an extension at Nailsea/Backwell. Others responded with the view that the release of Green Belt sites should be phased, that new developments should exhibit exceptional sustainability credentials while remaining Green Belt should be used positively such as for biodiversity.

Where Green Belt releases were proposed there were strong objections raised by local communities.

SP8: Housing

There were many responses in relation to the overall housing target set out in the government's standard method. Many felt that the approach was flawed and should be challenged and wasn't appropriate given the constraints within North Somerset. Several responses from the development industry emphasised that the target was a minimum and recommended that this should be increased to reflect economic aspirations, support affordable housing delivery, provide flexibility and choice and take account of any unmet needs from Bristol (22,968 dwellings plus Bristol overspill was proposed).

The affordable housing target was both supported and challenged. There was general acknowledgement that there was a need for more affordable housing but concerns about the lack of viability evidence and the role of First Homes. Many comments related to the broad location of new housing. This included support for or opposition to development in the Green Belt or in areas at risk of flooding. There was much comment in relation to the amount of development which was appropriate within villages. Many communities felt that the balance was wrong and that there was too much growth proposed for the rural areas. Many developers argued that villages were sustainable locations and that more sites needed to be identified, particularly in order to provide a supply of easily deliverable sites.

The Preferred Options acknowledged that there was a shortfall in relation to the amount of housing required and a large number of representations were received either supporting the draft allocations or proposing alternative sites.

SP10: Transport

Many of the comments on this strategic transport policy related to proposed growth in key locations particularly proposed growth at Nailsea and Backwell, and the other strategic growth locations.

Many of the concerns centre on the existing congestion issues experienced in the area as well as the current propensity for car use. Whilst the principles enshrined

within the policy to promote more sustainable modes of travel were generally supported, there is some concern that these will not be delivered and what the impact of proposed growth will be.

General concern over the perceived absence of traffic assessment and detail regarding the transport strategy. Also concern over the deliverability of proposals including costing.

- 3.7 The locational policies received 933 comments across all the policies. The most comments were in relation to the policies relating to the strategic locations of Yanley Lane, Wolvershill and Nailsea/Backwell, as well as the Settlement Boundary and Green Belt policies. Below is a summary of the key concerns and issues raised in relation to some of these policies.

LP1: Strategic Location – Wolvershill (north of Banwell)

Some comments focus on the principle of development in this location including some suggestion that housing is preferable closer to Bristol, and that too much growth is proposed in this area. Conversely some support due to proximity to Weston-super-Mare, such as for employment access and infrastructure such as Worle train station.

Potential developers of the strategic site expressed broad support but questioned whether the number of dwellings should be expressed as a minimum, and whether there was potential for increased capacity on this site, and also to reduce the proposed scale of employment provision.

Some support for the principles of development as identified in draft Policy LP1 and features such as the proposed Strategic Gap between Banwell and the new development. Also support for the recognition of importance of green infrastructure, for habitat, environmental, and recreational benefit.

Significant concern over proposals related to transport and highway impacts. Traffic concerns include reference to the impacts of the Banwell Bypass on nearby communities, and also potential of closing Wolvershill Road to through traffic. Some comments referenced the need for additional transport mitigations including the J21 relief road. In general, with comments received to this, and other policies in the plan, there is support for active travel modes including cycling.

Some comments on the potential for impact upon sensitive species and habitats as well as the AONB to the south of the proposed development.

LP2: Strategic Location – Yanley Lane (Woodspring Golf Course)

Many respondents objected to the principle of building in the Green Belt as well as loss of wildlife, open space, recreation and impact of surrounding areas. Some felt the scale of development was too big whilst others felt there needed to be a longer time horizon given to the strategic sites in order to fully understand their requirements.

The impact on traffic was a strong concern especially on Colliter's Way and the A38 which many felt were already at capacity. There was considerable cynicism about the ability to create effective public transport with some suggesting the development would still be reliant on private cars. Others suggested Mass Transit was the key to changing travel habits.

The impact on Long Ashton and local character of Yanley Lane and Glebe Road was a concern. As was the impact on watercourses and from the Barrow tanks. A heritage impact assessment needs to be undertaken and understanding of the impact of increased recreation on local areas. Regarding the site itself, issues were raised about the boundary and whether it should include the area north of the railway or be closer to the Bristol edge along the new road.

The importance of the woodland, watercourses, green infrastructure on the site and ecological connectivity with the wider area was raised together with ensuring net positive biodiversity and importance of mitigations. Comments about density were mixed. Higher density would reflect optimal use and land and support for public transport whilst lower densities would be more akin to North Somerset. The need to ensure employment provision was voiced by some.

There was strong support from the potential developer of the strategic site for the proposed allocation, although they wanted to include the area north of the railway for a combined education and employment campus and see longer term safeguarding of land south of the A38. Support for the scheme cited the need for housing, the connections with employment and good transport links with Bristol and does not impact the existing villages. The need for further work and engagement with Bristol City Council, the wider region and local communities, as part of a detailed master plan, policy and design guidance was raised.

LP3: Nailsea and Backwell

A key concern is around the scale of proposed growth and the impact this will have on existing infrastructure, character and identity of the village. In this respect greater concern appears to focus on Backwell rather than Nailsea.

Key concerns centre on traffic impact both in terms of existing situation and the need to deliver new infrastructure. In addition, wider concerns around impacts on wildlife, agricultural land, landscape quality, and flood risk. Some responses question the justification for proposed release of land within the Green Belt.

Key focus on the importance of infrastructure, notably transport infrastructure and its deliverability. Some comments consider the lack of information at this stage to support the growth proposals. Despite a majority objection to the proposals, there is some support and recognition of the need for growth at a smaller scale, and for smaller units to meet local needs.

- 3.8 There are 64 policies in the development policies section of the plan grouped into the following sections: Design and Place-making, Transport, Economic Development, Historic and Natural Environment, Life Prospects, Countryside and Delivery. A total of 1,070 comments were received for this section of the plan. The Consultation Statement provides a summary of the main issues raised.

Principal issues to address

3.9 The response to consultation highlighted a number of critical issues which need to be considered as part of the next stage of plan making. Many of these issues had been identified through the previous consultations but were now being expressed in relation to the more detailed policies and allocations proposed in the Preferred Options document. These key issues were debated by Place Policy and Scrutiny Panel at its meeting on 13 July 2022. A summary of the issues discussed at that meeting is included in section 4 below.

Housing target

3.10 The scale of the housing requirement is the biggest challenge. The Preferred Options acknowledged that the potential 18,064 dwellings identified was short of the government's standard method target which is currently 20,880 dwellings, and that the Pre-submission plan would need to address this. The standard method is a minimum requirement, and the final local plan housing requirement may be higher. Several development industry representations have argued that the housing requirement should be more than 2,000 dwellings more.

3.11 There are currently changes proposed to the planning system and some speculation that the mechanism for determining the housing requirement may change. While this will be kept under review, the priority should be to progress the local plan as quickly as possible as adopting an up-to-date new local plan is the key to successfully managing speculative development pressure.

3.12 In terms of delivery, it is important to recognise that the local plan needs to provide a balance between short and long-term sites. If there is too much dwelling capacity tied up in strategic sites with complex infrastructure requirements and long lead in times then there would be pressure at examination to identify more sites which were capable of delivery in the short term.

Addressing the housing shortfall

3.13 The housing shortfall (using the current methodology) in the draft plan is a minimum of 2,834 dwellings. The agreed spatial strategy and sequential approach provide a framework for assessing additional potential sites. The sequential approach for identifying sites is as follows:

1. Maximise urban capacity.
2. Town expansion (outside the Green Belt).
3. Sites at larger villages with good public transport.
4. Other villages locations.
5. Other options.
6. Green Belt.

3.14 In numerical terms there is sufficient capacity at sites put forward by landowners and developers to meet the shortfall under the current methodology. The local plan process needs to assess the opportunities to identify which opportunities will best reflect the plan's objectives, deliver sustainable development and meet the government's housing target. The starting point for this assessment is the sequential approach set out above. The following paragraphs outline the options.

Urban capacity

3.15 It is important to revisit the approach the approach to ensure that development opportunities at the towns is maximised particularly in relation to optimising density and use of brownfield sites.

- 3.16 The existing published evidence base is considered to be robust, but if other opportunities were identified such as through the placemaking studies at the towns then this should be recognised. For example, at Wyndham Way, Portishead there may be an opportunity to deliver more housing over the plan period than is currently identified.

Town expansion (outside the Green Belt)

- 3.17 There are a limited number of opportunities around Weston given flood zone constraints and easily accessible villages such as Locking which need to be reassessed given the scale of the shortfall. This includes potential sites currently designated as strategic gaps. There may also be some opportunity to include additional parcels as part of the strategic Wolverhill development.
- 3.18 Further growth at Nailsea in addition to existing allocations is very challenging given the need for strategic transport measures. The evidence supporting the Preferred Options indicated that a crossing of the railway to either the east or west was necessary to support the scale of new development proposed. Additional transport evidence is now indicating that the preferred transport solution is likely to be a new road crossing of the railway to the east. In addition, further growth to the south and west of Nailsea is difficult to mitigate in transport terms.

Larger villages with good public transport

- 3.19 These larger villages were identified as Yatton and Backwell. There are some additional sites at both locations to be assessed, but there are transport concerns related to the scale of overall growth in both areas.

Villages

- 3.20 The next largest, most sustainable villages are identified as Banwell, Bleadon, Churchill/Langford, Congresbury, Sandford, Winscombe and Wrington. There was a significant level of concern from rural communities that the balance in the local plan was wrong and that too much development was proposed at villages, or that the sites identified were inappropriate or unsustainable. There is also strong pressure from the development industry to provide a greater range and choice of sites in the plan by making additional allocations at villages such as these. The local plan must identify the appropriate proportion of overall growth at villages given the need to deliver a mix of development opportunities.

Other options such as land at risk of flooding or new settlements

- 3.21 There were representations received from promoters of sites which were relatively well-related to the towns but required flood mitigation that these should be included and prioritised above Green Belt locations. Development in areas at risk of flooding had taken place at Weston and Portishead in the past but given the climate emergency it is not proposed that similar sites are allocated in the new local plan.
- 3.22 No representations were received specifically promoting the proposed new settlement at Mendip Spring to address the shortfall.

Green Belt

- 3.23 The government attaches great importance to Green Belts whose fundamental aim is to prevent urban sprawl by keeping land permanently open. Once established, they should only be altered where exceptional circumstances are fully evidenced and justified. Representations were received arguing that exceptional circumstances had not been demonstrated, while others called for additional use of Green Belt land such as at Portishead and Nailsea.

- 3.24 When reviewing the Green Belt, government advice is that a local planning authority should, where necessary, identify areas of safeguarded land to meet longer term needs beyond the plan period. Representations were also received suggesting that safeguarded land should be considered on the Bristol fringe.
- 3.25 The sequential approach set out in the Preferred Options concluded that given the scale of the housing target, the exceptional circumstances did exist for amending the Green Belt in relation to creating sustainable communities adjacent to urban areas. With the exception of Backwell, this excluded development at the larger villages in the Green Belt on the grounds that the exceptional circumstances were unlikely to be met at these relatively less sustainable locations.

Infrastructure delivery

- 3.26 Delivery of the necessary infrastructure to support new jobs and homes is a key part of the Local Plan. An Infrastructure Delivery Plan (IDP) will accompany the Pre-submission Plan. It will set out what infrastructure in terms of transport, schools, parks and green spaces, leisure facilities, health services and other community facilities will be required to support new development over the plan period. Importantly the IDP will also set out how the infrastructure will be funded and when it should be delivered. In order to maintain progress in accordance with the published timetable, a clear indication will be needed as to the agreed allocations to make up the shortfall and the transport and other infrastructure required to facilitate them.

Employment

- 3.27 Delivering an attractive and vibrant place for business investment and sustainable growth is key corporate priority. The broad quantum of employment provision proposed in the plan is supported by the evidence and is considered to provide an appropriate mix of opportunities. Further work is required to explore the potential for new employment provision as part of the new strategic growth areas at Yanley Lane, Nailsea/Backwell and Wolvershill and how this can be facilitated with new infrastructure investment, particularly transport.
- 3.28 Additionally, settlement boundaries at villages have been amended to include rural employers allowing more flexibility for these businesses to expand and intensify over the plan period to support the rural economy. Representations were received from Royal Portbury Dock and Bristol Airport and it is important to take into account the role they play in the local and regional economy.

Placemaking

- 3.29 It is essential that the plan provides the mechanism to achieve high quality places where people want to live, work and spend their leisure time. There is a risk that the plan is portrayed as simply a means to meet a numerical housing requirement. The plan must deliver sustainable development which secures mixed and balanced communities and includes the necessary infrastructure with good masterplanning and high quality design.

Viability

- 3.30 Viability was a key issue raised across many policy areas including affordable housing, self-build, provision of older persons accommodation, net-zero construction, climate change adaptation and resilience, accessible and adaptable homes, biodiversity net gain and provision of infrastructure. The next stage of the plan-making process will be accompanied by a full plan viability assessment. This assessment will consider all the development requirements set out in the policies

and conclude whether the plan is viable or recommend where choices may need to be made in order to make the plan viable.

Next steps

- 3.31 The next published stage of the plan making process is the preparation of the Pre-submission document at the end of the year. This is the version of the plan which the Council intends to submit for examination and will be subject to consultation. This will need to identify how the housing shortfall will be addressed and will require either the identification of additional sites in accordance with the spatial strategy or broad locations to be considered in more detail when the plan is reviewed. However, the potential changes to the planning process through the Levelling Up and Regeneration Bill and related policies such as amendments to the NPPF could have a significant bearing on this process. The implications of any national changes will be closely monitored and further updates provided as and when appropriate.

4. Consultation

- 4.1 The subject of this report is the response received to the Local Plan 2038 Preferred Options consultation. It followed the Challenges and Choices Consultations which took place in 2020. The next stage of consultation on the Local Plan is the Pre-submission stage and is currently timetabled for the end of 2022. A Consultation Statement for the Preferred Options consultation which sets out how we consulted, who we consulted and a comprehensive summary of the responses to each policy is available to view.
- 4.2 The Pre-submission Stage (Regulation 19) is the consultation on the Council's final version of the plan that is intended to be submitted to the Planning Inspectorate for examination. At pre-submission stage the consultation focuses on whether the plan complies with relevant legal requirements. Consultation is for six weeks and the responses received to the pre-submission stage are submitted to the Inspector to consider as part of the examination process.
- 4.3 Place Policy and Scrutiny Panel considered the response to consultation on 13 July 2022. The summary of their discussion taken from the draft minute is as follows:

In discussion, the following points were raised:

- *The importance of infrastructure planning such as transport, schools, health and community facilities alongside new development.*
- *The concerns from many communities over the nature and scale of development proposed, particularly at villages. Was the amount of development proposed in rural areas too high and leading to unsustainable development patterns? There was a need to ensure that the plan contained an appropriate range and mix of sites, including locations which could be delivered in the short term.*
- *The importance of identifying how the full housing requirement would be addressed in the plan before submission for examination. If sites were to be removed, then these would need to be replaced.*
- *The need to consider potential locations in terms of the spatial strategy and sequential approach.*
- *Whether it was probable that the standard method formula for calculating housing numbers would be changed.*

- *The weight in national policy terms of protecting Green Belt as opposed to considering areas at risk of flooding. The government attached great importance to Green Belts and their role was to retain openness and prevent urban sprawl. If development was proposed in flood risk areas, then this could be seen as being contrary to the climate change objectives while the additional costs of flood mitigation could impact on resources for other aspects of infrastructure development.*

5. Financial Implications

5.1 The Local Plan will be progressed using existing budgets.

Costs

The estimated cost of preparing the Local Plan, including the supporting evidence, is anticipated to be around £442,000 over 5 years. It should be noted that the Council must also pay the costs of the examination process including the Inspector.

Funding

The plan is progressed using existing budgets and reserves.

6. Legal Powers and Implications

6.1 The Local Plan is being progressed under the Town and Country Planning Act 1990 (as amended) and related Regulations. There is a requirement for all local planning authorities to have an adopted local plan in place.

7. Climate Change and Environmental Implications

7.1 The new local plan will play an important role in defining and delivering the Council's response to the climate emergency. It will set out the approach to climate change and environmental issues in terms of, for example, the location and form of development, renewable energy, minimising car use, encouraging green infrastructure and biodiversity, avoiding sensitive areas such as areas at flood risk and minimising waste.

8. Risk Management

8.1 The absence of an up-to-date development plan incurs risks related to the uncertainty of future investment decisions and speculative development proposals potentially leading to increased planning appeals and less sustainable development solutions.

9. Equality Implications

9.1 An Equalities Impact Assessment accompanied the Preferred Options consultation. Feedback from the consultation will inform the next stage of the plan.

10. Corporate Implications

10.1 The new Local Plan 2038 will be a significant tool in delivering the Corporate Plan vision and objectives and has significant implications for a wide range of Council services in terms of, for example, the future location of population, jobs and infrastructure.

11. Options Considered

11.1 The Local Plan preparation process requires various strategic development and policy options to be considered as set out in the background papers. Not preparing a Local Plan will expose the Council to significant risks from speculative development; increased planning appeals; and other potential interventions.

11.2 There are a number of options which have been considered in relation to the housing requirement in the new local plan. These are whether:

- To plan on the basis of the standard method housing requirement but as an alternative to fully allocating all sites it is possible to identify some longer term 'broad locations for growth' to be considered when the plan is reviewed.
- The constrained nature of North Somerset means that it is inappropriate to plan for the full requirement given nationally important designations such as Green Belt, AONB, habitats sites and land at risk of flooding. This means it is very challenging to accommodate the growth required in sustainable locations. Government guidance is that authorities should follow the standard method 'unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals' (NPPF paragraph 61).
- To revise the plan's timetable to enable the outcome of the national planning reforms and possible changes to the standard method to be considered.

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Appendices:

None

Background Papers:

Preferred Options consultation document:

[North Somerset Local Plan 2038, Consultation draft, Preferred Option \(n-somerset.gov.uk\)](https://www.n-somerset.gov.uk/sites/default/files/2020-07/Local%20Plan%202038%20-%20Preferred%20Option%20Consultation%20draft.pdf)

Challenges for the future consultation document.

<https://www.n-somerset.gov.uk/sites/default/files/2020-07/Local%20Plan%202038%20-%20Challenges%20for%20the%20Future.pdf>

Challenges for the future consultation statement.

[https://www.n-somerset.gov.uk/sites/default/files/2020-10/Local%20Plan%202038%20Consultation%20Statement%20October%202020.pdf](https://www.n-somerset.gov.uk/sites/default/files/2020-10/Local%20Plan%202038%20-%20Consultation%20Statement%20October%202020.pdf)

Choices for the future consultation document.

<https://www.n-somerset.gov.uk/sites/default/files/2020-11/North%20Somerset%20Local%20Plan%202038%20challenges%20and%20choices%20part%20two%20-%20Choices%20for%20the%20future.pdf>

Choices for the future consultation statement.

<https://www.n-somerset.gov.uk/sites/default/files/2021-02/Choices%20Consultation%20Statement.pdf>

Preferred Options Consultation Statement.

[Preferred Options Consultation – 2022 | North Somerset Council \(n-somerset.gov.uk\)](#)