

## Draft Local Plan Policy Comments

January 2024

(p18) Policy SP2: Climate change

- "The council declared a climate emergency in 2019 and has a target of being carbon neutral by 2030"
  - When were public given evidence to support this and when did the public vote on this NSC decision?

(p60) Policy LP9 Bristol Airport

- "More than two thirds of local authorities in the UK have declared their commitment to help delivering the Net Zero Transition through declaring a climate emergency."
  - Therefore one third have not - on what evidence did NSC declare one?

(p115) Policy DP15: Active and sustainable transport

- "Road transport greenhouse gas emissions represent a fifth of total UK emissions, the biggest contributor being private vehicle trips. The **transport sector is, at 49%, the largest single source of carbon emissions in North Somerset. (not farming or emissions from cows)** This is considerably higher than the regional (South West) average of 24% and the national average of 24% from transport (Department for Business, Energy and Industrial Strategy, 2019). For the West of England region, transport CO2 emissions will rise by a further 22% by 2036 if we don't act, increasing the risk of droughts, floods and extreme heat globally and in the South West.
- **Current private vehicle trips and predicted growth represents a significant challenge** in meeting national and local carbon reduction targets. It is not expected that mass take-up of low emission vehicles will solve the problem alone, nor will it solve the challenges of capacity, congestion, deteriorating health and well-being and pressure on space.
- **One of the biggest challenges in reducing highway transport emissions is encouraging behaviour change."**

(p121) Policy DP18: Travel plans

- support delivery of the North Somerset Active Travel Strategy and Climate Emergency Strategic Action Plan, encourage a greater proportion of trips by active travel modes, shape active travel neighbourhoods, **reduce car travel and encourage sustainable travel, especially walking opportunities, for journeys less than one mile.**

(p130) Policy DP22: Visitor attractions

- "Proposals must meet climate change objectives and have **no adverse impact on environmentally sensitive areas such as the Mendip Hills AONB** and areas at risk of flooding and minimise the development of permanent structures and hardstandings."

(p151) Policy DP34: Green infrastructure

- "The North Somerset Climate Emergency Strategic Action Plan identifies the need to **replenish carbon stores** in the district. GI is relevant since it **involves providing and maintaining areas of vegetation** and trees... The GIS objectives include ... the **creation of bigger, better, more and joined-up woodland, grassland** and wetland habitats to achieve the ambitions of the West of England Nature Recovery Network"
- "Where it is not possible, practical or desirable for green infrastructure provision or enhancement to be made on site, then adequate measures for **off-site provision** will be made, which may involve formal agreements and financial contributions" **How much of this off-site provision will be on food production land? How will NSC assess and offset food requirements?**

(p154) Policy DP35: Nature conservation

- "Where a development requires **off-site mitigation** for greater horseshoe bats it is expected that **developers will consider the use of the North Somerset Nature Parks strategic mitigation sites as a preferred means of achieving that mitigation**. These Nature Parks are located in areas that have been **modelled** as providing the most important habitat and connectivity for bats and encompass a mixture of existing prime habitat for protection and areas that are suitable for enhancement". **Does the modelling match real world outcomes? Will other districts also use NSC sites for offsetting their nature requirements (not only bats)? How will this effect farming, food production and security?**

(p159) Policy DP36: Biodiversity net gain (BNG)

- "If it can be demonstrated that it is not possible to achieve the required BNG on site or that there are overriding benefits in making provision elsewhere, then off site mitigation may be acceptable. Where **off-site** mitigation is required, preference will normally be given to locations close to or well related to the development site" **Has it been proven that developing on land (destroying nature in one are) and offsetting it by using an off-site mitigation actually protects or improves nature?**
- "Natural England produced a Biodiversity Metric 4.0 in July 2021 for most developments, and a Small Sites Metric (SSM) for use on small development sites in some circumstances (such as where no priority habitat, protected species, or **off-site** mitigation is involved). These (or any subsequent versions) provide the methodology for the BNG calculation. The calculation and BNG assessment must be set out in the biodiversity gain plan, including data and maps showing habitats affected and proposed."
- "... this policy requires that developers should firstly aim to avoid, then minimise, then mitigate for, adverse impacts on biodiversity on site, before resorting to **off-site mitigation**... developers may be able to demonstrate that there are clear overriding benefits in providing supporting habitat for species away from the development (perhaps where species are sensitive to disturbance), in which case off-site mitigation may also be acceptable."
- See [Bodiversity Net Gain Consulation blog](#)

(p25) Policy SP6 Villages and rural areas

- "The policy approach allows rural buildings to be converted to dwellings, subject to criteria, as it makes use of an existing resource." **How does NSC policy ensure that barns needed for feed, housing animals and machinery, etc. are not lost?**
- "Where there are no existing suitable sites within settlement boundaries, a variety of non-residential proposals may be acceptable outside settlement boundaries." **How will NSC policy ensure farming and variety of food production is not reduced?**
- NSC definition "**Rural building**: All buildings outside of settlement boundaries other than permanent dwellings ... and buildings on existing or safeguarded employment sites, quarry or waste sites. Primarily this is likely to be agricultural building"

(p27) Policy SP7: Green Belt

- "The Green Belt is regarded as a multifunctional asset which not only carries out the traditional purposes set out nationally by maintaining openness and protecting land from inappropriate developments, it also ensures productive farmland ..." **Bleadon is not in a green belt area**

(p31)SP9 Employment

- "Updated economic forecasts have been used to assess the requirements for **employment land** demand over the plan period (Employment Sites and Premises Requirements Evidence, Hardisty Jones Associates, 2023). This assessed economic forecasts across a range of sectors using data from Cambridge Econometrics and Oxford Economics. The assessment **modelled** the corresponding demand for employment land and premises across the range of business land typologies in North Somerset and across the West of England." **81.25ha** over WSM, Wolverhill, Clevedon and Portishead. **Do the models reflect real world requirements? How much of this is greenfield food production land?**

(p130) Policy DP22: Visitor attractions

- "Changes to farming policy and support payments are likely to result in an increasing number of farmers and landowners looking to diversify their businesses and potentially include visitor accommodation, camping and glamping" Will current or increased levels of food production be guaranteed or reduced?

(p162) Policy DP37: Trees, woodlands and hedges

- "Proposals for **off-site provision** is made where tree planting is not appropriate or practical on site" Is food production to be used as tree off-site provision?

(p165) Policy DP38: Landscape

- "Where some harm to the local landscape character is unavoidable, but a development is otherwise deemed beneficial, then positive mitigation measures should be secured by a landscape condition or planning agreement involving works on or **off-site** as necessary."
- Will "rolling valley farmland" continue to be productive in a range of food produce (arable, sheep, cows, pigs, etc) especially if landowners (not necessarily farmers) may be encouraged to diversify into solar panels (possibly with just sheep and no dairy produce) , wildflower meadows, trees/forestry, etc.?

(p208) Policy DP55 Agriculture and land based rural businesses

- Definition of "Land based rural business development: A business which requires a rural location and is totally dependent on the use of the surrounding countryside for its business success such as horticultural, equestrian development, farming" (Glossary p294) Not just food production
- "Planning permission will be granted for agricultural or forestry development on existing and new holdings, or development for the purposes of farm based and other land-based rural businesses or diversification provided that:" Will NSC guarantee that there will be no adverse effect on food production (for people and animals), e.g. with the rise in planting trees?
- "Farm diversification activities can contribute to the local economy by providing opportunities for employment or recreation for residents and visitors and by resulting in increased patronage for local shops and services. Such activities, where they come within planning control, will generally be supported provided that the character and appearance of the countryside are not harmed." Will food production be 'harmed', character and appearance over necessary function of food production?

(p209) Policy DP56: Equestrian development

- "Permission for equestrian development will be permitted provided that either individually or cumulatively:..." a number of exceptions that do not include the protection of food production? Equestrian use removes land from food system category.

(p214) Policy DP58: Conversion or re-use of rural buildings

- "Retailing will not be permitted, other than farm shops, small scale village stores, proposals under 200m<sup>2</sup> or proposals that are ancillary to the main use.
- If the building was completed within 10 years of the application being submitted for an agricultural or equestrian use the applicant will need to demonstrate that the conversion of this building is essential for the long-term benefit of the associated agricultural/forestry/equestrian operation." How does this policy protect farms who rent rural building for the housing of animals, feed, machinery, etc.? How will this use be 'offset'?

(p218) Policy DP60: Employment on green field land in the countryside

- "Development proposals for new buildings for business use (Use Classes B2, B8 or E(g)) on previously undeveloped sites outside settlements will only be permitted where no suitable redevelopment sites or redundant rural buildings suitable for re-use are available and: • The proposal relates to processing locally grown produce or other land based rural business; However, how does this policy prevent the other caveats from reduces food production?

(p221) Policy DP62: Visitor accommodation in the countryside including camping and caravanning

- "The construction of new buildings for use as visitor accommodation outside the Green Belt and AONB will be permitted provided that: ...(conditions)
- Proposals for new or extended touring and static caravan sites outside the Green Belt and AONB will be permitted provided that:... (conditions)
- All visitor accommodation should: Not have a significant adverse effect on the living conditions of adjoining occupiers or adversely affect the operation of working farms;... (does this also include rotated land use for crops and animals?)
- Proposals to use mobile homes on longstanding existing holiday parks for permanent residential accommodation will only be permitted if:
  - They are outside flood zone 3; and They are easily accessible in relation to existing facilities and services."
- How does this policy prevent 'caravan creep' and protect food production?