

Annex 1: W0E 03 Councils' Response to Inspectors Letter of 1st August 2018 (ref ED03)

Annex 1

<i>Issue</i>	<i>Councils' response</i>
<p><i>1. Additional Evidence Work</i></p> <p>It perhaps goes without saying, but it is obviously of crucial importance that this work (particularly that in relation to HRA and SA) is carried out with an "open mind" and does not seek to simply justify the approach/policies currently set out in the draft plan.</p> <p>The summaries of the work to be undertaken appear to cover the significant points we have raised to date. However, in respect of the SA work we would again emphasise that it is important that the Councils consider whether there are any, as yet untested, reasonable alternatives to any element of the plan and if they judge that there are not that an explanation of this is provided.</p> <p>Also, does the summary of work proposed to be undertaken include that which, prior to our initial letter, the</p>	<p>Comments and the advice from the Inspectors in respect to the additional work the councils are undertaking to consolidate the SA is noted and understood.</p> <p>Yes. The West of England Councils intend to publish the following additional documents:</p> <ul style="list-style-type: none"> • Paper outlining compliance with the Duty to Cooperate by the four authorities with Statements of Common Ground for each neighbouring authority

<p>Councils themselves indicated to us they are intending to carry out?</p>	<ul style="list-style-type: none"> • Updated HRA (SD10) • Consolidation of Sustainability Appraisal (SD9) • Strategic emerging findings transport report • Updated transport topic paper (SD8) • Updated evidence on viability • Updated evidence on employment (Policy 4) • Updated justification and clarification on Para 66, on the status of the Strategic Development Locations and on the criteria and requirements for each of the 12 SDLs (Policy 7). • Clarification on the wording in the publication document including, factors which the Local Plans would need to consider in respect of deleting land from the Green Belt and exceptional circumstances. • Key issues paper will be published following the November 2018 consultation (February 2019).
<p><i>2. Strategic Development Locations</i> However, in the light of your most recent letter we are now somewhat confused as to the Councils' position and intentions concerning the paragraph 66 "starting point" and "will evolve" wording in relation to these criteria/requirements. We do not seek an immediate answer to this, but request that the Councils consider the point and make clear their intentions in this respect at the time of the publication of the additional evidence base work.</p> <p>To assist us in identifying the key issues for soundness and to minimise, as far</p>	<p>Clarification will be provided for the Inspectors at the time of the publication of the additional evidence base work (see above).</p> <p>This work will be made available for the Inspectors at the time of the publication of the additional evidence base work see above</p>

as possible, the amount of hearings time it takes to consider these criteria/requirements, it would be helpful if for each of the SDLs a short paper is produced to briefly, but specifically, summarise the justification for each of the policy 7.1 – 7.12 criteria and requirements.

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