

Gladman Developments Ltd

North Somerset Core Strategy Remitted Policies Examination Hearing Statement

Matter 1 - Sustainability Appraisal May 2016



1 ARE THE SUSTAINABILITY APPRAISALS THAT HAVE PREVIOUSLY BEEN CARRIED OUT SUFFICIENT TO DEMONSTRATE THAT THE CONSEQUENTIAL CHANGES TO THE POLICIES CONTINUE TO REPRESENT THE MOST APPROPRIATE POLICY DIRECTION AND SPATIAL STRATEGY?

1.1 Context

1.1.1 The first point to make is obvious but important. The change to Policy CS13 is not a minimal or even moderate change. It is significant and fundamental with the ability to undermine key aims of the Core Strategy if not dealt with appropriately.

1.1.2 The Council argues that because the strategy proposed remains the same as the original housing distribution strategy - that was based on providing just 14,000 homes - it is not considered that a further iteration of the SA process would result in a different outcome. That is a bold statement to make when the change in number means that the spatial distribution of housing in some areas has increased significantly and in others, has more than doubled.

1.1.3 The overall strategy may remain the same, but that does not automatically mean that the suitability of the Council's original approach remains appropriate. In stark terms, the Council's approach is, a further 7,000 homes can be accommodated with no additional environmental, social or economic impact than has already been assessed. The position beggars belief.

1.1.4 The PPG makes clear that

This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. Sustainability appraisal should be applied as an iterative process informing the development of the Local Plan.¹

1.1.5 Accordingly, the appraisal is not simply about assessing how a plan can contribute towards sustainable development, but it is about identifying any adverse effects so that they can be mitigated. In failing to carry out an addendum SA, the Council is saying, there will be no adverse effects associated with an additional 7,000 homes; that would seem a highly unlikely proposition, but again, there is no assessment of it.

1.1.6 Of course it is right that the distribution of housing according to a well-established hierarchy of urban / principal settlements first and countryside last may be the most sustainable approach, but

¹ Paragraph: 001 Reference ID: 11-001-20140306

that does not mean it remains appropriate when the requirement is significantly increased, and nor does it render the numbers involved irrelevant. Plans are not supposed to be based on guesswork, and there are obvious implications that arise from significant increases in growth regardless of whether the distribution is broadly in accordance with a previous strategy for far fewer houses. It assumes the sustainability of a settlement and its ability to accommodate housing remains the same comparatively, regardless of how many houses are to be put there. There is no evidence to support such a contention.

- 1.1.7 The purpose of a Sustainability Appraisal is to ensure that plans will contribute to the achievement of sustainable development, and without having carried out the exercise in the first; it cannot be just be supposed that it will.
- 1.1.8 We note that the Council undertook an addendum SA for the purpose of the examination into Policy CS13. That was entirely the right thing to do. It was essential that an appraisal be undertaken in respect of an increase in numbers, in the same way that it is essential to undertake a further appraisal in respect of the distribution of housing numbers. The Council's production of the addendum SA at that stage of the plan making process only serves to emphasise the continuing need and duty to do so at this stage.
- 1.1.9 As an example of the potential difficulty in not carrying out that exercise, the original SA Template identified key issues and problems, such as congestion on the strategic transport routes arising from the homes/jobs imbalance, particularly at Weston-super-Mare. It is now proposed to put an additional 3,000 in the Weston Urban Area (excluding Weston Villages), but given that congestion and out-commuting is already a problem, it is essential to understand how an additional 3,000 additional homes just in the WUA will impact on that. Without a further SA that evidence is not available, and so the Council cannot demonstrate that the Strategy contributes to the achievement of sustainable development.
- 1.1.10 Further, the provision of jobs alongside homes in a balanced way is a fundamental plank to the existing strategy to improve the sustainability and economic performance of North Somerset. However, the Council is not proposing to alter Policy CS20 to bring jobs into line with additional housing growth, and by its own admission, the objective of "self-containment" will be diluted as a result². Accordingly, not only will an additional 3,000 homes give rise to a significant number of trips on an already congested road network, but without the provision of sufficient jobs, inherently unsustainable patterns of out-commuting will continue and worsen as the difference between homes and jobs increases.
- 1.1.11 In such circumstances, an alternative distribution of housing to other areas more able to accommodate the level of growth proposed without detriment to the highways network may have been preferable, and certainly should be tested.

² Appendix A of the Council's Response to Inspector's letter of 22 April 2014

- 1.1.12 It is not the point of these representations to go through every element of sustainability that might be adversely or positively affected by the increase in housing numbers and the Council's decision to stick to the original distribution strategy. Suffice it to say, it should have been obvious to the Council that such a large increase in numbers had the potential to impact on the sustainability of the original spatial strategy, such that an addendum sustainability appraisal is necessary if the Council is to comply with its legal duties under section 19 of the PCPA 2004.
- 1.1.13 Gladman would therefore contend that this exercise must be undertaken before the Inspector can properly assess whether the Remitted Policies are 'sound'.
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