

SA Appraisal Supplementary Report - Revised Other Remitted Policies Consultation Responses

Respondent Name	Respondent ID	Respondent Organisation	Comment (formatted)
Natural England	1018753	Natural England	No comments to make on this consultation.
Environment Agency	1020673	Environment Agency	<p>Thank you for referring the above Sustainability Appraisal, which was received on 18 May 2016.</p> <p>The Environment Agency has no comments to make in respect of this Sustainability Appraisal Supplementary Report.</p>
David Lock Associates	11187745	David Lock Associates	<p>NORTH SOMERSET CORE STRATEGY – Sustainability Appraisal Supplementary</p> <p>Report - Revised Other Remitted Policies, May 2016.</p> <p>Response on behalf of Hallam Land Management</p> <p>These representations are made by David Lock Associates on behalf of Hallam Land Management in response to consultation on the Sustainability Appraisal Supplementary Report - Revised Other Remitted Policies.</p> <p>Hallam Land Management (HLM) is of the view that the sustainability appraisal supplementary report demonstrates that the consequential changes to the policies continue to reflect the most appropriate policy direction and spatial strategy to accommodate growth.</p> <p>It is however acknowledged that the Council have not undertaken a SA process exclusively to re-appraise the consequential changes to the policies CS9, CS19, CS32 and CS33. The Council consider that as it proposes no changes to the policy wording in respect of these individual policies listed, it is not necessary to conduct a further SA. HLM have made representations that the wording of policy CS32: Service Villages should be amended so as to provide flexibility to support delivery of development sufficient to meet housing needs, taking into account both the backlog in the Council's supply and the national imperative to "boost significantly" the supply of housing. HLM's position in relation to the requirement to amend the wording of CS32 is also set out</p>

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			<p>in the Hearing Statement in respect of the CS Consequential Changes Matter 3, Question 4.</p> <p>Notwithstanding HLM's clear position that amendments to the working of policy CS32 should be made to ensure that policy is positively prepared, effective, justified and consistent with national policy, it does not necessarily follow that the SA should at this stage, be revisited in respect of Policy CS32.</p> <p>The Council has carried out additional SA work to support the emerging Site Allocations Plan (Consultation Draft, March 2016), which identifies sites that would contribute to meeting the increased housing requirement. This SA has appraised sites individually. Furthermore, as part of the preparation of the emerging Site Allocation Plan, the Council have also undertaken an overarching re-appraisal of the relative sustainability of settlements which concluded that the existing service village designations and strategy for accommodating growth at villages and rural settlement remains an appropriate strategy through which to direct growth across the district.</p> <p>HLM are therefore of the view that sufficient re-assessment has been carried out by the Council to demonstrate that service villages, in particular Yatton, are capable of accommodating additional growth as now proposed by the consequential changes. Indeed, it is considered that the Service Villages could accommodate a greater proportion of the increased requirement than currently proposed (additional+1,050).</p> <p>Critically, and notwithstanding the Council's decision not to revisit the SA process for the above policies as referred to above, the policies were included in the original 2011 SA to the Core Strategy. That original SA tested a number of housing delivery options ranging from 6,711 - 26,750 dwellings, a range within which the now adopted housing requirement of 20,985 sits.</p> <p>In summary: having regard to the Inspector's conclusion that the SA process in relation to the re-examination of Policy CS13 was sound (para 27-30); noting that the spatial strategy as set out in the Core Strategy is already being delivered, and as such, the Plan making process is now only able to influence part of the strategy that defines where development should be located; and taking into account the conclusions of the SA supplementary report for policies CS14, CS28, CS30 and CS31 that no additional significant effects, (including cumulative effects) can be identified, HLM considers that the proposed spatial hierarchy, that seeks to prioritise growth at the most sustainable settlement</p>

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			categories, remains consistent with that appraised at various stages throughout the plan making process and that no new “reasonable alternatives” have been identified that would require a re-consideration of the spatial strategy.
Strongvox Homes (Pegasus Group)	11219713	Pegasus Group	<p>RESPONSE TO NORTH SOMERSET SUSTAINABILITY APPRAISAL SUPPLEMENTARY REPORT – REVISED OTHER REMITTED POLICIES ON BEHALF OF STRONGVOX HOMES</p> <p>North Somerset Core Strategy Examination Response to SA Supplementary Report June 2016 DH/NT BRS.5631</p> <p>1. THE SUPPLEMENTARY SUSTAINABILITY APPRAISAL The Scoping Report 1.1 A Sustainability Appraisal was prepared in support of the North Somerset Core Strategy in February 2011 and a Sustainability Appraisal Supplementary Statement was also provided to Inspector Sims in February 2012. Inspector Sims concluded that these were adequate to meet the legal requirements in his final report, dated 15th March 2012. However, Inspector Sims attributed limited weight to the draft NPPF at this time, prior to its publication on 27th March 2012. 1.2 The NPPF now provides a significant material consideration which was unavailable and therefore did not inform the Sustainability Appraisal Scoping Report which continues to be used. In such circumstances it is strongly recommended that the Scoping Report needs to be reviewed or that as a minimum its consistency with the NPPF needs to be considered. Policies informed by Sustainability Appraisal 1.3 The PPG (11-006) identifies that “Sustainability Appraisal is integral to the preparation and development of a Local Plan, to identify how sustainable development is being addressed, so work should start at the same time that work starts on developing the plan” and the PGG (11-018) identifies that “the development and appraisal of proposals in Local Plan documents should be an iterative process, with the proposals being revised to take account of the appraisal findings.” 1.4 The PPG (11-018) identifies that a Sustainability Appraisal “should identify, describe and evaluate the likely significant</p>

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			<p>effects on environmental, economic and social factors” and that it should “identify any likely significant adverse effects and measures envisaged to prevent, reduce and, as fully as possible, offset them.”</p> <p>1.5 The consequential changes to the remitted policies of the Core Strategy have now been proposed in response to the High Court challenge and seek to provide for the now adopted 20,985 homes (as compared to 14,000 as identified in the challenged Core Strategy). Since the adoption of this revised housing requirement, the consequential changes to the remitted policies have been consulted upon in November 2015, submitted for examination in early 2016 and Hearing Statements have been produced in May 2016. This was all done without any further iteration of the Sustainability Appraisal. As such, it is clear that these consequential changes have not been informed by a Sustainability Appraisal (beyond that which was produced in support of the adopted Core Strategy) contrary to the PPG (11-006).</p> <p>1.6 Following the submission of the Hearing Statements the Council have published a Supplementary Sustainability Appraisal Report. This identifies in paragraph 2.2 that it was undertaken in May 2016. It therefore, by its own admission did not inform the consequential changes but instead has been retrospectively produced to justify conclusions which had already been reached.</p> <p>1.7 In summary, the consequential changes have not been informed by Sustainability Appraisal as required by the PPG. The need for a further iteration of the Sustainability Appraisal</p> <p>1.8 The Council appear to accept that the consequential changes have not been informed by a further iteration of the Sustainability Appraisal and seek to argue that there are a number of factors that mean that this is not required. The first is that the policies remain largely unchanged from those remitted in the Core Strategy and so they have already been subject to Sustainability Appraisal.</p> <p>1.9 The Sustainability Appraisal published in February 2011 did indeed assess the sustainability of the policies within the emerging Core Strategy. However, it did this in the context of delivering 13,400 homes as opposed to the 20,985 homes which were subsequently adopted. As a result it assessed the sustainability of the remitted policies in a very different context.</p> <p>1.10 For example, the Sustainability Appraisal of February 2011 assessed the sustainability of limited development in Infill Villages as being neutral in terms of meeting local needs locally (SC1). Given that the overall housing requirement has increased by 57% it is self-evident that the same constraint-led policy will provide for fewer homes compared to the identified need with a corresponding negative effect on this sustainability objective. A revised Sustainability Appraisal would therefore have reached a different conclusion on the sustainability of such a policy and this</p>

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			<p>would need to be considered in the development of alternative policy-wording. However, without a revised Sustainability Appraisal having considered these effects, the sustainability of the policy in the current context has not been established and so appropriate mitigation and reasonable alternatives have not been considered. As a result, the consequential changes to the remitted policies are not informed by a Sustainability Appraisal which meets the test of adequacy and do not meet the procedural requirements.</p> <p>1.11 The second reason identified by the Council is that any changes to the remitted policies would only have a limited effect owing to the fact that there are only 1,715 homes remaining to be identified.</p> <p>1.12 It should be noted that this figure of 1,715 homes is not agreed by any participant to the examination of the consequential changes to the remitted policies, as the developable supply identified by the Council is so aspirational as to be unrealistic. These objections are set out in the Hearing Statements and are not repeated here. The true figure will be significantly greater, which in itself undermines the argument of the Council that the effect will be limited. For the remainder of this response the figures of the Council are used although it must be recognised that these significantly underestimate the residual need.</p> <p>1.13 The justification for producing a Core Strategy in advance of a Sites and Policies Plan is so that the framework is in place to identify allocations in sustainable locations. However, the Council include the emerging allocations and “other identified sites” within their supply, which entirely undermines the justification for examining the remitted policies in isolation as the distribution has already been prejudged.</p> <p>1.14 These sources of supply cannot be relied upon until they have been subject to examination. To do so would prejudice the subsequent examination of the Site Allocations Plan. Indeed, as set out in our Hearing Statement these two elements of the development plan cannot be examined in isolation as they are reliant upon one another in order to be found sound.</p> <p>1.15 Therefore, without these sites being subject to examination they must be discounted, which results in a remaining requirement for 4,329 homes (based on the figures of the Council) to be distributed between the settlements in North Somerset.</p> <p>1.16 The distribution of either 1,715 or 4,329 homes will have significant implications for some settlements and this must be informed by and the effects recognised and mitigation identified within a Sustainability Appraisal.</p> <p>1.17 Furthermore, and perhaps most critically, it is not just the residual requirement that will have significant sustainability implications, but rather the cumulative requirement. Indeed, by</p>

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			<p>way of example, an additional 350 homes which remain to be identified in Clevedon, Nailsea and Portishead may not have sustainability implications by themselves (although they may have and this has not been assessed) but the delivery of an additional 1,261 homes once the emerging allocations are discounted (or a total of 4,976 homes) within these settlements may have. Therefore, even if it is concluded that a Sustainability Appraisal is not necessary for the 350 homes to be identified (not that Pegasus Group would agree with this) there is a necessity for a Sustainability Appraisal to assess the cumulative impact of these as part of total requirement for 4,976 homes.</p> <p>1.18 Similarly, the Sustainability Appraisal of February 2011 identified that the proposed 8,958 homes in Weston-super-Mare would result in congestion on the strategic transport routes. However, the consequential changes now seek to direct 12,959 homes to this town and yet no Sustainability Appraisal of these effects was undertaken during the development of the consequential changes. It is clearly necessary for a Sustainability Appraisal to inform such a significant change.</p> <p>1.19 The PPG (11-021) identifies that “modifications to the sustainability appraisal should be considered only where appropriate and proportionate to the level of change being made to the Local Plan.” The level of changes including a 57% increase to the housing requirement are clearly significant and as such a new iteration of the Sustainability Appraisal is required. To argue that a 57% increase is not significant is unreasonable, and if such a line of argument were to be advanced (as it appears to be) then this logic would dictate that it would not be significant if the housing requirement were uplifted by a further 57% to 32,950 homes. If this is the case and this number of homes would not have significant effects on sustainability then this is what should be proposed through the Core Strategy in the interests of providing a significant boost to housing supply.</p> <p>1.20 In summary, a further iteration of the Sustainability Appraisal was required and this needs to have informed the consequential changes to ensure that the consequential changes represent sustainable development in the context of a significantly increased housing requirement and to ensure that reasonable alternatives and suitable mitigation is considered.</p> <p>1.21 Given the publication of the Supplementary Sustainability Appraisal following the generation of the consequential changes it cannot be concluded that this has informed these changes and so they are procedurally flawed. However, even if it is able to be demonstrated that this Sustainability Appraisal has informed the consequential changes, there are a significant number of concerns with this that go to the heart of soundness, as follows.</p> <p>The robustness of the Sustainability Appraisal</p>

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			<p>1.22 It is noteworthy that the Supplementary Sustainability Appraisal does not assess the sustainability implications of the consequential changes to Policies CS6, CS19, CS32 and CS33 as the wording has not changed from that in the challenged Core Strategy. These policies have therefore not been assessed through a Sustainability Appraisal in the context of a significantly increased housing requirement. This is procedurally flawed.</p> <p>1.23 Indeed, as an example the challenged Core Strategy proposed 805 homes in Service Villages, but the consequential changes now propose 2,133 homes. The sustainability of Policy CS32 therefore needs to be assessed as this is the policy which will provide for this housing requirement. However, it has simply not been assessed and this is a significant procedural flaw. Exactly the same applies to Policy CS33.</p> <p>1.24 Where the Supplementary Sustainability Appraisal does assess the sustainability implications of the consequential changes it identifies that these are identical in the context of achieving a housing requirement of 20,985 homes as compared to the remitted policies which sought a requirement of only 14,000 homes. This simply defies logic. The effects of maintaining constraint-led policies in response to a significantly increased housing requirement must necessarily have a negative impact on housing supply.</p> <p>1.25 The consequential changes to Policy CS14 now propose a significantly different distribution of housing (in absolute numbers if not in proportion). Indeed, by way of example, Weston-super-Mare is now proposed to receive 12,959 homes as compared to 8,958 in the remitted policies. As identified above, the Sustainability Appraisal of February 2011 identified that the 8,958 would result in congestion on strategic transport routes and this was somehow scored as having no significant effect (EC11). Notwithstanding the logic of this scoring, it is inevitable that the increase of housing provision in Weston-super-Mare will have an additional negative impact on congestion but somehow the Supplementary Sustainability Appraisal continues to consider that there is no significant impact of these additional 4,000 homes. This cannot be justified.</p> <p>1.26 Similarly, the Sustainability Appraisal of February 2011 assessed the requirements for 13,400 homes and 10,100 jobs. Since this time, Policy CS13 has been challenged and re-adopted providing for 20,985 homes alongside the 10,100 jobs identified in Policy CS20. It is acknowledged that this has the effect of diluting the employment-led strategy. However, the Supplementary Sustainability Appraisal assesses the effect on self-containment (EN1) as being identical for each of the consequential changes compared with the Publication Draft. Again this simply defies logic.</p>

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			<p>1.27 The same absence of logic is evident throughout the Supplementary Sustainability Appraisal as the increased housing requirements across North Somerset and in all of the urban areas (including Weston-super-Mare, Weston Villages, Nailsea, Clevedon and Portishead) are assumed to have no implications on any sustainability objective an in particular the following:</p> <ul style="list-style-type: none"> • Self-containment (EN1); • The loss of productive land (EN4); • Meeting economic development needs, including sufficient new jobs to at least match the increase in homes (EC1); • Reduce queuing and over-crowding on the road and rail networks (EC11); • Locate new development on sites that will not add to traffic congestion (EC12); • Meet local needs locally (SC1); • Improve accessibility to service, retail, educational, leisure and social provision (SC2); • Meet housing requirement (SC10); and • Narrow the gap between income and house prices/rents (SC11). <p>Has the Sustainability Appraisal informed the consequential changes?</p> <p>1.28 As identified in the Hearing Statements an additional document has been produced, namely the Site Allocations Plan Sustainability Appraisal of Rural Settlements (February 2016) which assesses the sustainability of individual settlements. Whilst the approach of this document is subject to significant levels of objection it identifies that the Infill Villages of Sandford and Locking are equally as sustainable as the Service Villages of Banwell, Churchill, and Wrington. However, this Sustainability Appraisal has not informed the consequential changes and there is no justification for why some settlements which are equally as sustainable are classified differently.</p> <p>Reasonable Alternatives</p> <p>1.29 The PPG (11-018) identifies that a Sustainability Appraisal “should assess all reasonable alternatives.”</p> <p>1.30 The only alternatives considered in all iterations of the Sustainability Appraisal are as follows:</p> <ul style="list-style-type: none"> • The emerging policies – which are constraint-led; • The “no plan” option - which relies upon the constraint-led policies of the Joint Replacement Structure Plan 2002; and • The “business as usual” option – which relies upon the constraint-led policies of the North Somerset Replacement Local Plan 2007. <p>1.31 It can be inferred from these options that the Council do not</p>

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			<p>consider a more positive approach to boosting housing supply through permissive policies in accordance with the NPPF as being a reasonable alternative. However, an approach that accords with national policy must by definition be a reasonable alternative and this must be considered in the Sustainability Appraisal. The Sustainability Appraisal has not therefore considered all reasonable alternatives or indeed the most reasonable alternative in accordance with national policy contrary to the PPG. The lack of such an option is indicative of the unwillingness of the Council to even consider a more progressive, NPPF-compliant approach to housing delivery.</p> <p>1.32 If such an option had been considered, including a more permissive approach to development in Service Villages and/or Infill Villages, then this would inevitably have scored better in regards of the social and economic factors as it would have facilitated local needs being met in the short term.</p> <p>Conclusions</p> <p>1.33 As identified throughout this response, the consequential changes to the remitted policies have not been informed by a Sustainability Appraisal, but instead a Sustainability Appraisal has been undertaken retrospectively to support the conclusions which had already been reached. This is procedurally flawed.</p> <p>1.34 The retrospective Sustainability Appraisal utilises a Scoping Report which was not developed in the context of the NPPF; it fails to consider the impact of the revised housing requirement and distribution; and it does not consider all reasonable alternatives.</p> <p>1.35 Furthermore, some conclusions of the Sustainability Appraisal documents have been simply ignored including the fact that Sandford is demonstrated to be equally as sustainable as many Service Villages. Notwithstanding the procedural flaws, the Sustainability Appraisal cannot be considered to pass the test of adequacy.</p> <p>1.36 In summary, the Sustainability Appraisal fails to comply with advice set out at a national level and it is respectfully requested that a revised Sustainability Appraisal is undertaken within a scoping framework which is consistent with the NPPF; which takes full account of the revised housing requirement and distribution; and which considers all reasonable alternatives. This should then be used to inform policy development rather than being used to retrospectively justify conclusions which have already been reached.</p>

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Historic England (R Torkildsen)	12476353	Historic England	<p>Thank you for inviting our comment on the Sustainability Appraisal Supplementary Report. Having considered the Report my only substantive observation relates to Policy CS30.</p> <p>Policy CS30: Weston Villages</p> <p>Historic England note the proposed increase in the ‘dwelling figure’ for this already sizeable development proposed within the vicinity of Locking Castle Schedule Monument, the Locking Head Farmstead (Grade II Listed Building) and their associated historic landscape setting.</p> <p>It is apparent from the SA (pages 76 and 77) of the potential threat to the significance of these heritage assets and their settings and the need, therefore, for greater clarity in either the Site Allocations Plan and/or revisited Weston Villages SPD of how an increased dwelling figure can be accommodated whilst fulfilling NPPF historic environment policy, and the obligations within the Ancient Monuments and Archaeological Areas Act 1979, and Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>Can the Local Authority clarify how it intends to respond to the recommendations of the SA and in doing so help to ensure the aforementioned statutory and national policy matters are addressed.</p>
Gallagher estates	14401409		<p>Please do not let the brevity of these representations distract from the fact that the SA contains fundamental flaws and falls short of the legal requirements set out in the Planning & Compulsory Purchase Act 2004 and The Environmental Assessment of Plans and Programmes Regulations 2004 (hereafter referred to as the Strategic Environmental Assessment (SEA) Regulations), as well as the tests of soundness.</p> <p>We write on behalf of Gallagher Estates who own the majority of land at Pill Green (see enclosed plan at Appendix A). This could</p>

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			<p>come forward in whole, or in part, depending on the scale of need.</p> <p>We are commenting on the North Somerset Sustainability Appraisal Supplementary Report (SA) (Consultation Draft, June 2016), which we consider has significant flaws.</p> <p>While our specialist Environmental Planning has undertaken a comprehensive critique of the SA process followed by North Somerset Council (Appendix B), our representations principally focus on the Council's failure to consider "reasonable alternatives," which includes a proper assessment of the Green Belt.</p> <p>These failings of the SA will need to be rectified to avoid any risk of challenge.</p> <p>FULL RESPONSE ATTACHED</p>
Persimmon Homes Severn Valley	14590529	Persimmon Homes Severn Valley	<p>North Somerset Core Strategy Sustainability Appraisal Supplementary Report</p> <p>Response on Behalf of Persimmon Homes Severn Valley</p> <p>The publication of the Sustainability Appraisal Supplementary Report (SASR) is a game changer. Previously the Council have always argued, successfully (eg Roland Punchon's conclusion in his paragraphs 29 and 30), that there was no need to revise the original Sustainability Appraisal. Paragraph 1.8 of the SASR repeats this contention, but argues the report has been produced '<i>for the avoidance of doubt and to inform discussion</i>'. That is not the purpose of a Sustainability Appraisal. NPPG11-006 says that '<i>Sustainability Appraisal is integral to the preparation and development of a Local Plan, to identify how sustainable development is being addressed, so work should start at the same time that work starts on developing the plan.</i>' Clearly a Sustainability Appraisal cannot be produced in the way the Council suggest merely to aid discussion. It is integral to the plan preparation process and the Council, having belatedly recognised the original Sustainability Appraisal is no longer fit for purpose, have to address the issue properly and not as an addendum. The SASR identifies no sustainability impacts of two substantial and</p>

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			<p>significant changes in the strategy comprising a 57% increase in the housing provision, with no commensurate increase in employment provision, which are integral to the achievement of employment-led strategy.</p> <p>The timing of the SASR raises another fundamental issue. NPPG11-018 says that <i>'the development and appraisal of proposals in Local Plan documents should be an iterative process with the proposals being revised to take account of the appraisal findings.'</i> Clearly the SASR is an afterthought, which fails to do that. We consider the preparation of the SASR, after the consideration of changes to the remitted policies, has then clearly influenced its findings. It has been produced to justify the status quo and the Council's previous position that a 57% increase in housing and no increase in employment would not impact on the sustainability of the plan.</p> <p>Further comments are set out below and referenced against paragraph numbers in the SASR.</p> <p>Paragraph 1.1 - confirms the report appraises the consequences for sustainability of revising the other remitted policies and therefore to accord with the NPPG, and if the Council considered in accordance with paragraph 11-020 considered further assessment was required, it should have been carried out at the time the remitted policies were revised. Then it could have been taken into account in revising those policies, which may have led to the need for further changes.</p> <p>Paragraph 1.2 – is based on a self fulfilling prophecy. It suggests over a 50% increase does not amount to a change strategy, so that a further iteration of the Sustainability Appraisal process will result in a different outcome. This clearly supports the Council's position before the SASR was produced but does not assess the effects of the increase and their impacts on the strategy.</p> <p>Paragraph 1.3 – suggests specific site boundaries are required to assess environmental affects. Clearly the guidance in NPPG on <i>'strategic environmental assessments and sustainability appraisal'</i> demonstrates that this is not right. Also, the conclusion that <i>'it has to be assumed that subsequent site selection will avoid sites that are environmentally sensitive'</i> is wrong because the site selection process is a separate exercise which is also dependent on a Sustainability Appraisal and should not be based on an assumption that <i>'it will be alright on the night'</i>.</p>

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			<p>Paragraph 1.4 – claims much of the housing required is now committed or identified in the Site Allocations Plan, but that plan is at a very early stage and has yet to be properly tested at examination. The assumption that the shortfall is 1,715 is therefore unsubstantiated and we consider is a considerable under estimate of the true need. If the untested sites relied upon in the Site Allocations Plan are taken out the remaining requirement would be 4,329 homes. In addition, we do not consider it is appropriate to rely on a Site Allocations Plan before the distribution policies of the Core Strategy have been examined and adopted. If the Council had wanted to do that they should have abandoned the current process and prepared a comprehensive single revised Local Plan. Otherwise the current examination of the remitted policies will be undertaken on the basis of a predetermined distribution in a separate but untested plan.</p> <p>Paragraph 1.5 – we do not accept that in the 5 years that have elapsed since the original Sustainability Appraisal there has not been a change in emphasis in Government Policy relating to Housing Policy and Provision. This began with the NPPF in March 2012, which introduced the basis of the current approach to boosting significantly the supply of homes. This developed through various Ministerial and Prime Ministerial statements, resulting in a number of housing targets being set, including 200,000 new homes per annum and other initiatives such as starter homes and self-build and custom building now clearly defined in the Housing and Planning Act 2016. Following the successful legal challenge in 2013, the original strategy and plan was found not to reflect the growth strategy and this on its own demonstrates the sustainability appraisal the Council rely upon was based on a substantially different strategy. This also raises a further issue, that in producing the SASR, the opportunities to test the alternatives of a growth strategy should have been taken and we comment further on this in response to paragraph 4.4.</p> <p>Paragraph 1.6 – the Inspector very carefully does not specifically say that the Sustainability Appraisal work was sound only that no separate sustainability appraisal process is required to justify the modifications and there was no clear evidence that the options have been incorrectly assessed.</p> <p>Paragraph 2.2 – we note that North Somerset Council have carried out all the Sustainability Appraisal work on the Core Strategy internally, which provides less confidence than when it is carried out externally (eg Bath and North East Somerset, Stroud). The impact of the timing of the document on the examination process is also of concern.</p>

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			<p>Paragraph 2.3 – sets out difficulties which actually are common to all Sustainability Appraisals and cannot be used to justify the inadequate approach of the Council in this case.</p> <p>Paragraph 4.4 – the Spatial Objectives of the plan cannot be used to justify not assessing any reasonable alternatives which have arisen since the original in this new Sustainability Appraisal. Indeed, the change in emphasis in Government Housing Policy to significantly boost housing supply demands that this should have been done anyway. Therefore we conclude that the SASR is contrary to the NPPF paragraph 47 and to NPPG guidance 11-016 to test reasonable alternatives and to identify the likely significant effects of the available options. The fact is the assessment of a growth option to boost significantly housing supply has not been undertaken and therefore it is not possible for the SASR to conclude such an approach is unrealistic.</p> <p>Paragraph 4.5 – It is incomprehensible to argue that an increase in the housing numbers of over 50%, with no increase in job numbers, as part of an employment-led strategy, necessary to address imbalances in self containment, does not change the relationship between housing and employment, particularly in Weston-super-Mare. Clearly it does and the impacts on sustainability of which self containment is a key element should be properly assessed. The assessment contained in the SASR implies the effect on Sustainability Appraisal Objective EN1 (maximising self containment of the urban areas) is identical for each consequential change as in the publication version, a conclusion which we suggest is unreliable.</p> <p>The results seen in the Site Allocations Plan is an increase in the Service Villages. However, the distribution of the numbers appears to be entirely ad hoc with no proper assessment of the capacity of each village and which completely disregards the Site Allocations Plan document entitled '<i>Assessing the Sustainability and Settlement Hierarchy of Rural Settlements in North Somerset</i>'. The supporting text of the Site Allocations Plan says that settlement boundaries define the limit of development that is necessary to preserve and maintain the character and separate identity of many of the towns and villages in North Somerset, but in the absence of a review there is no evidence to demonstrate whether this has been achieved. There is also no evidence to justify why 219 houses in Churchill, 696 in Yatton and only 65 in Backwell are appropriate. Indeed, where evidence exists it suggests a different conclusion. In particular, '<i>assessing the sustainability and settlement hierarchy of rural settlements in North Somerset</i>' clearly identifies Backwell as the most</p>

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			<p>sustainable village in North Somerset, whereas Churchill and Yatton are identified as environmentally sensitive. The document carries out an RAG assessment where Backwell has 6 green and 2 ambers, Churchill 7 ambers and 1 red and Yatton 3 greens, 4 ambers and 1 red. There is clearly no correlation between the sustainability assessment and the allocations for each village.</p> <p>The supporting text justifies the Council's approach on the basis that as only limited development is envisaged outside the towns there is no justification for a comprehensive review of settlement boundaries. However this prejudices the development that is proposed is in the right place without in addition undertaking a settlement boundary review to support the sustainability assessments of the settlements.</p> <p>Paragraph 4.5 also claims the changes can be accommodated and this <i>'reflects the flexibility that was built into the original wording'</i>. That appears to be a convenient way to justify the no change approach of the Council and we do not consider from the evidence the Council relied upon at the CS13 examination that the level of flexibility implied was originally intended. Also the flexibility is clearly not reflected in the policy wording, where the general approach is development <i>'in'</i> not development <i>'at'</i> settlements. In particular the substantial increases in the numbers of dwellings at Churchill (25%) and Yatton (22%) do not reflect the policy wording in CS32 of <i>'residential development within'</i> and <i>'small scale residential supported by the local community,'</i> and where in Yatton the local community has opposed all new development.</p> <p>Paragraph 4.7 – We note that the policy wording in CS6, CS19, CS32 and CS33 is unchanged and this is used as a reason for not assessing the policies in the SASR. The above assessment suggests that this should have been done and having carried out the new SASR procedurally this should have assessed all policies.</p> <p>Paragraph 5.3 – one of the main negative effects is on traffic as an indirect consequence of housing growth not linked to local employment opportunities. This would appear to go to the heart of the employment-led strategy and should have led logically to an assessment of the alternatives. The predetermined no change stance means this has not been done.</p> <p>Paragraph 5.5 – suggests that Policies CS31 and CS32 provide for settlement boundaries to be relaxed to accommodate development. However the reference in CS32 to small scale developments supported by the local community <u>must</u> be brought</p>

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			<p>forward through the Site Allocations Plan or Neighbourhood Development Plan is open to interpretation and has not necessarily been applied in the past. For example the planning application for 150 dwellings at Arnolds Way, Yatton (14/P/0191/O) which is not small scale and was not brought forward through any plan was approved contrary to policy.</p> <p>Paragraph 5.6 – introduces a policy change to the employment-led policy and the aim to improve self containment. In 5.6 this is said to be <i>‘not an overriding objective, given the aim of National Policy to boost significantly the supply of housing.’</i> If this is now the policy of the Council then itself it requires further changes in policy wording to make this absolutely clear. If we accept that the employment-led strategy reflected the plan’s emphasis primarily on matching homes and jobs in Weston-super-Mare, nevertheless if the strategy and figures were right previously that balance has changed again. That change in balance resulting in more houses and no increase in jobs clearly impacts on the emphasis of matching homes and jobs in Weston-super-Mare which has not been properly assessed.</p> <p>Paragraph 5.7 – recognises the difficulties of achieving improvements at transport nodes to justify further the development. This suggests opportunities should be maximised where packages have been achieved (eg Portishead) and where new funding packages are not required (eg Backwell).</p> <p>Paragraph 5.8 – says the higher the housing figures the less scope there is to avoid damaging effects. However, we know that the overall housing figure is now fixed at a figure 50% higher than originally and despite the Council’s original intent, an SA was required to assess accommodating the numbers in the least damaging way. Therefore notwithstanding what the CS13 Inspector said about the adequacy of the previous Sustainability Appraisal it is not clear why a Sustainability Appraisal to assess the most sustainable way of accommodating the increased numbers he recommended was not carried out on receipt of his report.</p> <p>This would have informed the modifications to the other remitted policies and the preparation of the Site Allocations Plan and assessed the effects identified in paragraph 5.8.</p> <p>Paragraph 5.11 – similar comments also apply in relation to the concerns raised in paragraph 5.11 regarding the cumulative effects of increased numbers. It has to be accepted that the original housing number has increased by over 50%. It also has to</p>

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			<p>be accepted that this is a fixed figure and that this Sustainability Appraisal should have assessed how it can be accommodated in the most sustainable way. However the Council's argument is that all but 1,715 have been accommodated. This has largely been achieved through planning permissions now incorporated as proposed allocations in the Site Allocations Plan. However this means that the majority of the increase in numbers have been accommodated through the Development Management Process and have not been subject to a plan-led approach supported by a plan-Led Sustainability Appraisal.</p> <p>Paragraph 5.12 – says the Core Strategy is a high level document that relies on subsequent documents to add detail. However the reality of the process the Council have undertaken is to rely on a subsequent document, the Site Allocations Plan to lead the changes to the Remitted Policies in the Core Strategy which are concerned specifically with the distribution of development. Even if the new housing requirement is distributed broadly within the same strategy as before we suggest that there is potential for substantial local impacts which need to be assessed. In addition a significant increase is proposed in Nailsea, whilst in policy terms Nailsea is one of three towns covered by Policy CS31 and there is no assessment of why Nailsea is more sustainable than Clevedon or Portishead.</p> <p>Conclusion</p> <p>PHSV considers the SASR fails to comply with national guidance and does not properly assess the effects of changes to the employment-led strategy of the increased housing numbers on the remitted housing distribution policies of the Core Strategy.</p> <p>Paul Davis</p> <p>Strategic Land Director</p> <p>Persimmon Homes Severn Valley</p> <p>Davidson House</p> <p>106 Newfoundland Way</p> <p>Portishead</p> <p>BS20 7QE</p> <p>Tel No: 01275 396000</p>

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			Email: paul.davis@persimmonhomes.com 16th June 2016		
s.lyon	14823841		Relating to the proposal to develop the Open Space at The Uplands Nailsea - attached is a letter received from Dr Liam Fox MP which has been included with his permission and also with the permission of Mr M Passey the addressee. It is already well documented in other responses to the Site Allocation Plan that this is a highly valued public facility (including the area of woodland) which should be preserved.		
Linden Homes (Barton Willmore)	14888737	Barton Willmore	<p><u>SUSTAINABILITY APPRAISAL SUPPLEMENTARY REPORT - REVISED OTHER REMITTED POLICIES</u></p> <p>This letter provides a response to the above consultation on behalf of Linden Homes Strategic Land (Linden Limited). Linden Homes have interests in land north west of Nailsea which is proposed for allocation for residential development in the draft North Somerset Site Allocations Plan (March 2016).</p> <p>In this letter I comment, on behalf of Linden Homes, on the sustainability appraisal of the proposed changes to Policy CS31: Clevedon, Nailsea and Portishead. Those proposed changes propose an increase to the number of new homes planned to be delivered at Nailsea over the plan period from 210 in the publication version of the plan to 912, a 337% increase.</p> <p>In summary, our clients consider that the proposed changes to Policy CS31 which concentrate new housing development on Nailsea, represent the best approach to promoting sustainable development and when assessed against the sustainability appraisal objectives.</p> <p>In the remainder of this letter I provide comments on some of the specific assessment of the changes to Policy CS31 as set out in Appendix 1 of the SA Supplementary Report (May 2016).</p> <table><tr><td>SA Objective</td><td>Barton Willmore comments on proposed revised wording</td></tr></table>	SA Objective	Barton Willmore comments on proposed revised wording
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			<p>EN1. Maximise self-containment of the urban areas.</p> <p>And</p> <p>EN2. Minimise average travel-to-work distance.</p>	<p>We question whether, in the context of North Somerset's towns, self-containment of individual settlements is a realistic or appropriate environmental sustainability objective. In our view it is more realistic to consider how North Somerset and neighbouring areas work as a whole in terms of maximising opportunities for travel to work by non-car transport modes and reducing travel-to-work distances.</p> <p>Nonetheless, locating additional housing and economic development at Nailsea, which benefits from a range of services, employment opportunities and transport links, is in our view likely to contribute to reducing long-distance commuting and promoting more sustainable commuting patterns.</p>
			EN3. Limit rural development to that meeting local needs, or infrastructure needs unavoidably requiring a rural location.	We agree that development at Nailsea reduces dispersed rural development.
			EN5. Minimise flood risk.	We agree that Nailsea performs more favourably than Clevedon and Portishead in terms of flood risk constraints. We have submitted representations on behalf of our clients to the recent North Somerset Site Allocations Plan consultation which demonstrate, on the basis of technical work undertaken by Vectos, that flood risk is not a constraint to the development of the allocation at North West Nailsea proposed in that plan.

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			EN11. Avoid major development in the most environmentally sensitive areas.	Our recent Site Allocations Plan representations demonstrate that development at North West Nailsea could deliver an ecological enhancement.
			EC1. Meet economic development needs, including sufficient new jobs to at least match the increase in homes.	As above, we question whether a strict attempt to tie homes to jobs could be achieved in the context of North Somerset's towns. Nonetheless, there are opportunities to deliver economic development alongside new housing in Nailsea.
			EC2. Harness the particular economic opportunities of North Somerset.	We agree that focussing development at the main towns, including Nailsea, maximises economic opportunities.
			EC4. Maximise opportunities for regeneration and renewal within Weston-super-Mare, ahead of new development, especially ahead of major new housing.	We do not consider that development in Nailsea should be viewed as detrimental to the regeneration and renewal of Weston-super-Mare. We do not consider that development at Nailsea competes with development at Weston. Furthermore, the proposed revised wording of the plan includes a significant increase in the number of homes planned at Weston as well as increased development at Nailsea.
			EC7. Make fuller use of urban spaces and promote a	New housing development at North West Nailsea in close proximity to Nailsea's centre will support the strength of town centre uses in the town.

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			balanced night-time economy in town centres.	
			EC8. Diversify employment structure, improve choice of employment and produce greater opportunities to participate in society, paid or unpaid.	We agree that development at Nailsea will support the role of the town as a service centre.
			EC11. Reduce queuing and over-crowding on the road and rail networks. And EC12. Locate new development on sites – and access them in ways – that will not add to traffic congestion.	Development at Nailsea, particularly at North West Nailsea, reduces the need to travel by locating new housing in close proximity to services and facilities. In addition, as demonstrated in our recent Site Allocations Plan representation, opportunities for active transport would be maximised. New residents of Nailsea would have a genuine choice of transport modes for longer journeys, including bus and train, reducing impact on the road network.
			SC2. Improve accessibility to service, retail, educational, leisure and social provision.	Locating new residential development at Nailsea which is an established service centre, clearly supports this objective. It also creates opportunities to take advantage of surplus school spaces.

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			<div> <div>SC4. Develop a positive sense of place both physically and socially.</div> <div>We agree that supporting Nailsea’s role as a service centre supports this objective.</div> </div>	
			<p>Thank you for taking these representations into account in the ongoing plan examination. I would be grateful if we could be included in any updates on the examination going forward.</p>	
Mactaggart and Mickel Homes	15135393	Rocke Associates Ltd	See attached sheets.	
Moor Park (North Somerset) Ltd	15139169	Rocke Associates	See attached sheets.	
Nailsea Town Council	706241	Nailsea Town Council	<p>Para 5.5. The relaxation of the settlement boundary in order to achieve well-defined benefits of development is acceptable.</p> <p>CS31. North Somerset Council’s refusal to conduct a green belt review, which currently precludes the urban expansion of Bristol into the Ashton Vale puts development pressure on the towns and villages, and within Nailsea creates a pressure to build on inappropriate sites. A development south of Bristol would reduce commuting, capitalise on the new southern ring road and offers the chance to develop a sustainable, self-contained community in proximity to all the facilities of the city.</p> <p>EN4. The description “productive land” needs to be more clearly defined.</p> <p>More employment in Nailsea would be welcome and the Town Council has no objection to the principle of employment-led growth. This is mentioned in EN1, EN2, EC1, EC11, EC12, but as a specific policy employment-led growth is unrealistic for the town.</p> <p>It is inevitable that a significant proportion of people living in Nailsea will continue to work elsewhere, particularly Bristol. Out-commuting is inevitable and should be reflected in appropriate infrastructure development, such as an improved, appropriate and</p>	

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			<p>integrated public transport system. The aspiration of EC11 to “reduce queuing and over-crowding on the road and rail networks” is laudable, but the proposed solution is simplistic. EC12 offers a more strategic approach to the subject.</p> <p>An existing constraint in creating new jobs is the availability of suitable employment sites. This is compounded by North Somerset Council’s refusal to conduct a green belt review which would allow consideration of sites suitable for residential, leisure and employment to the north of the town. Therefore, the unitary authority is proposing an employment-led policy which it is itself inhibiting as a result of its green belt policy.</p>
Congresbury Parish Council	7688737	Congresbury Parish Council	<p>Congresbury Parish Council believes that paragraph 4.7 needs to be re-evaluated. It states that ‘the wording of policies CS6, CS19, CS32 and CS33 is proposed to remain unchanged from that submitted and so no further SA of these policies is needed at this stage’.</p> <p>Congresbury and local parishes have been affected by the additional of a considerable number of large scale housing developments which will put pressure on an already stretched infrastructure including roads, transport, education and medical services. Therefore it is considered that a Sustainability Appraisal needs to be completed for CS32 and CS33 which takes into account the cumulative effect of all developments.</p>
Highways Agency (S Walsh)	8141345		<p>Thank you for providing Highways England with the opportunity to comment on the Sustainability Appraisal supplementary Report in regards to the revised remitted policies to the Core Strategy.</p> <p>We have considered the comments in the report and consider they are generally reasonable.</p> <p>We would however encourage the Council to amend the policy wording, relating to increased housing and employment at Nailsea in particular, in order to establish the link between housing and jobs in the same way as the policy relating to Weston does.</p> <p>Such a policy will, we believe offer opportunities to maximise self-containment of Nailsea and minimise out-commuting from the town.</p>

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Gladman Developments	9334241	Gladman Developments	<p>These representations concern the following matters:</p> <p>SASR preparation process Analysis of the SASR Results of the SASR</p> <p>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.</p> <p>The SASR is nothing more than a tick box exercise, undertaken by the council at the 11th hour, to try to justify the decision to continue to follow the existing spatial strategy when accommodating the additional 7,000 units required as a result to the change to Policy CS13.</p> <p>The timing of the release of the information does not allow this significant piece of evidence to be carefully analysed and assessed by stakeholders to ensure it is robust and justified and to feed into the examination.</p> <p>The 'reasonable alternatives' that the council have considered throughout the SA process are 'business as usual' and 'no plan'. These are not considered to be reasonable alternatives and certainly do not assess all the possible spatial options for accommodating the substantial increase in the housing requirement brought about by the change to Policy CS13.</p> <p>The council should have considered other options such as distributing a greater proportion of growth to the Service Villages to accommodate the additional housing requirement rather than simply directing a predominance of the growth to Weston-Super-Mare.</p> <p>Therefore Gladman consider that the underlying premise set out in para 1.8 of the SASR that the council maintain that further SA of the remitted policies in unnecessary, is fundamentally flawed. The council are approaching the whole issue of the SA in a back-to-front fashion by first determining the strategy and then using the SA to justify that choice.</p> <p>FULL COMMENTS ATTACHED</p>

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Tom Leimdorfer	936033		<p>The document is flawed in that it avoids a Sustainability Appraisal relating to the granting of planning permission on several large greenfield sites outside settlement boundaries of service villages and other settlements. Paragraph 4.7 (p13) claims that no further SA is needed relating to policies CS32 and CS33. It is clear from the table on p.21 of the report (appendix 1.1) that in percentage terms the largest increase in housing allocation since the adoption of the Core Strategy in 2012 has been in the service villages (131%) and other settlements (128%). North Somerset Council has failed to look at the cumulative effects either in a single area (Yatton, North End) or in consideration of adjoining service villages subject to closely linked sustainability issues. This is the case for Yatton, Congresbury and Churchill/Langford, where large new housing developments put pressure on already overstretched infrastructure. The SEA directive relating to 'cumulative effects' (p.129) has been ignored by the Council and this report avoids the subject by not considering policies CS32 and CS33. It is also very weak to claim that such effects cannot be identified because of the 'high degree of uncertainty associated with some outcomes'. The whole of that section reflects a lack of understanding or willingness to engage with the concept of cumulative effects.</p>

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