# North Somerset Council 

## Core Strategy

## Sustainability Appraisal Supplementary Report Revised Policy CS13

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## NON-TECHNICAL SUMMARY

The Strategic Environmental Assessment (SEA) Directive ${ }^{1}$ requires that a nontechnical summary is provided of each SEA. This is set out below under the nine areas specified. Much of the required information is contained in the February 2011 Sustainability Appraisal (SA) of the whole Core Strategy; additional information is provided here only where circumstances have changed.
(a) An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes

This was set out in the 2011 SA of the Core Strategy ${ }^{2}$. If a new housing requirement figure is adopted, Priority Objective 1 of the Core Strategy - which includes the 14,000 minimum dwelling requirement - will need to be changed to reflect this.
(b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme
(c) The environmental characteristics of areas likely to be significantly affected
(d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC ${ }^{3}$
(e) The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation

These were set out in the 2011 SA.
(f) The likely significant effects ${ }^{4}$ on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors

The 2011 SA (Main Report - Appraisal Tables) set out the likely significant effects identified. Policy CS13 has been reappraised to relate to the range of housing requirement figures considered by the council in November 2013. The Core Strategy is a high-level strategic document. It relies upon subsequent documents to add detail and so many effects are uncertain at this stage. Appraisal has identified that higher levels of housing growth have a greater adverse effect on greenfield land and may

[^0]also increase congestion in the short-term, though a combination of the employmentled approach and demographic change is likely to reduce out-commuting by 2026.
(g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme

The Core Strategy is a self-contained document and so the policies themselves contain mitigation measures, where relevant. The Core Strategy is to be read as a whole, so the mitigation measures applicable to one policy may be set out in another.
(h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information

The 2011 appraisal of Policy CS13 used six options, ranging from 6,711 to 26,750 dwellings and including the then preferred option of 13,400. The approach followed here is to maintain consistency with that previous work, adding four further options, being the range of housing requirement figures considered by the council in November 2013: the 14,000 figure previously adopted, the 17,130 'low' figure now favoured by the council and the 'mid' and 'high' figures produced from work by Edge Analytics, 19,395 and 20,220.

The SA was carried out in accordance with government guidance. It was done internally. The main difficulties encountered were that:

- the prediction of future effects is to some extent inherently subjective;
- strategic choices may conceal effects that only become apparent once proposals are further refined; and
- effects vary in their predictability in line with planning's ability to influence events, with economic and social predictions being far less assured than environmental ones.


## (i) A description of the measures envisaged concerning monitoring in accordance with Article 10

Proposals for monitoring are set out in the North Somerset Core Strategy Monitoring Framework, produced as part of the 2011 SA. Monitoring of environmental effects will be integrated with local plan monitoring generally. The results will be published in the Annual Monitoring Report.

## ABBREVIATIONS

| CS | Core Strategy |
| :--- | :--- |
| dpa | dwellings per annum (completions) |
| HRA | Habitats Regulations Assessment |
| LDF | Local Development Framework |
| NPPF | National Planning Policy Framework |
| ODPM | Office of the Deputy Prime Minister (now Department for Communities <br> and Local Government) |
| PDL | Previously developed land (also known as brownfield land) |
| RLP | North Somerset Replacement Local Plan (adopted 2007) |
| RSS | Regional Spatial Strategy |
| SA | Sustainability appraisal |
| SEA | Strategic environmental assessment |
| SEA <br> Directive | EU Directive 42/2001 EC on the environmental effects of plans and <br> programmes |
| SHLAA | Strategic Housing Land Availability Assessment |
| SHMA | Strategic Housing Market Assessment |
| SuDS | Sustainable drainage systems |
| WsM | Weston-super-Mare |

## PART I: ORIENTATION

## 1. Introduction, Purpose and Summary

1.1 This Supplementary Report appraises the consequences for sustainability of increasing the Core Strategy housing requirement (2006-2026) from 14,000 (minimum) to 17,130 dwellings. This figure is part of the wording of Policy CS13: Scale of New Housing. The report forms part of the evidence base for the re-opened Examination into Policy CS13 and associated policies.
1.2 Appraisal has identified that higher levels of housing growth have a greater adverse effect on greenfield land and may also increase congestion in the short-term, though a combination of the employment-led approach and demographic change is likely to reduce out-commuting by 2026.

## 2. Background

2.1 The North Somerset Core Strategy Publication Version was the subject of Sustainability Appraisal (which incorporates Strategic Environmental Assessment) and Habitats Regulations Assessment (screening to consider whether significant effects on nature conservation sites of European importance are likely). The SA and HRA reports were both published in February 20115. Much of the required information for an updated SA is contained in that original SA of the whole Core Strategy; additional information is provided here only where circumstances have changed.
2.2 A Supplementary Statement on Proposed Changes and Modifications was published in February $2012^{6}$. This provided a formal record of the consideration given to SA and HRA in respect of Proposed Changes (July 2011, revised November 2011), Main Modifications (January 2012) and Additional Modifications (January 2012) to the Core Strategy, i.e. those changes to the Publication Version (January 2011) which the council, having considered submitted representations and matters discussed at the hearings, was willing to make and therefore recommended to the Inspector. It was concluded that the Changes and Modifications did not raise issues from an SA or HRA perspective that would require further work at that stage and there were therefore no suggestions or recommendations for additional alterations or further assessment.
2.3 The Main Modifications included an increase in the housing requirement and the conclusions reached on this were as follows:

[^1]Table 1: Conclusions of SA of Main Modification to Policy CS13 (2012)

| Alteration | Effect on SA objectives |
| :--- | :--- |
| Housing requirement raised from 13,400 <br> to 14,000 and new distribution given <br> (objectives/CS13/CS14) | Positive on economic and social <br> objectives, negative on environmental <br> (greenfield land). No significant effects <br> identified - dependent on development <br> opportunities arising. An additional 600 <br> households will produce additional <br> environmental impacts, especially in <br> terms of resource use, though many of <br> these would occur wherever the housing <br> is located. Because the new number is <br> distributed broadly in accordance with the <br> same spatial strategy as before, specific <br> local impacts will not vary greatly either, <br> though smaller settlements take <br> proportionately more of the increase than <br> Weston. |

2.4 For the re-opened Examination, the council has put forward a revised housing requirement of 17,130 dwellings. Although it is close to the figure of 17,750 used in the Consultation Draft (November 2009) ${ }^{7}$, this has not been previously subject to SA.
2.5 It is not considered necessary to revisit comprehensively the initial stages of SA (the Scoping Report) involving review of the policy context and the baseline information. Any issues raised that may require reconsideration of aspects of these will be addressed on an ad hoc basis. There continues to be a strong emphasis on growth in more recent statements of national policy, for example in the NPPF, but this emphasis was in principle also present in previous guidance such as PPS3 and PPS4. The SA objectives used in 2011 include meeting both economic development needs (EC1) and the housing requirement (SC10). The challenge for planning continues to be to achieve this in a sustainable way, within environmental constraints.

## 3. Appraisal process

3.1 The SA was carried out in accordance with government guidance. It was undertaken internally, between November 2013 and January 2014. The detailed work is set out in the appraisal table in Appendix 1 and is summarised, with a commentary, in the body of this document.

### 3.2 The main difficulties encountered were that:

- the prediction of future effects is to some extent inherently subjective;

[^2]- strategic choices may conceal effects that only become apparent once proposals are further refined; and
- effects vary in their predictability in line with planning's ability to influence events, with economic and social predictions being far less assured than environmental ones.


## PART II: ANALYSIS

## 4. Stages and tasks

4.1 The ODPM guide ${ }^{8}$ lists a series of stages and tasks to be performed in carrying out an SA that incorporates the requirements of SEA:

Stage A - setting the context and objectives, establishing the baseline and deciding on the scope

- A1 - Identifying other relevant plans, programmes, and environmental protection objectives
- A2 - Collecting baseline information
- A3 - Identifying environmental problems
- A4 - Developing SEA objectives
- A5 - Consulting on the scope of SEA

Stage $B$ - Developing and refining alternatives and assessing effects

- B1 - Testing the plan or programme objectives against the SEA objectives
- B2 - Developing strategic alternatives
- B3 - Predicting the effects of the draft plan or programme, including alternatives
- B4 - Evaluating the effects of the draft plan or programme, including alternatives
- B5 - Considering ways of mitigating adverse effects
- B6 - Proposing measures to monitor the environmental effects of plan or programme implementation


## Stage C - Preparing the Environmental Report

- C1 - Preparing the Environmental Report

Stage $D$ - Consulting on the draft plan or programme and the Environmental Report

- D1 - Consulting on the draft plan or programme and Environmental Report
- D2 - Assessing significant changes
- D3 - Decision making and providing information

Stage E - Monitoring implementation of the plan or programme

- E1 - Developing aims and methods for monitoring
- E2 - Responding to adverse effects

Stage A - the Scoping Report stage - was carried out in 2007. Stage C - writing up the results of analysis - and most of Stage D - consultation on it - are accomplished with the publication of the present report for comment. Stage E (and Task B6 of Stage B) - monitoring - is for the future but the basis for monitoring was set out in the Monitoring Framework as part of the 2011 SA.

[^3]4.2 Stage $B$ - developing and refining alternatives and assessing effects - can be divided into six tasks. The justification for the strategic options tested is set out below. The assessment of effects is also summarised below; the detailed assessment is set out in Appendix 1.

## 5. Identifying the strategic options

## Task B1 - testing the plan or programme objectives against the SA objectives

5.1 Task B1 relates to testing of the plan objectives, so is not directly relevant here. Priority Objective 1 of the Core Strategy includes the previously adopted North Somerset housing figure ( 14,000 minimum) but remains tested through examination - and is extant - although the 14,000 number will need amendment as a consequential change to the text if the housing figure changes. Task B2 requires the identification of "reasonable alternatives taking into account the objectives and the geographical scope of the plan". The SA will assess possible housing numbers to feed into the objective, rather than ways of meeting it.
5.2 The figure in Priority Objective 1 is expressed as a minimum of 14,000 both in the objective and in the version of CS13 that was adopted but the council's revised figure of 17,130 is not. This different approach reflects the incorporation into the target of potential housing capacity that was previously additional to the 14,000 minimum and whose existence has been confirmed by further work since 2011, specifically the 2013 Strategic Housing Land Availability Assessment.

## Task B2 - developing strategic alternatives

5.3 Task B2 relates to developing the Core Strategy options. The ODPM guide recommends that broad strategic options are considered as opposed to detailed policy wording variants. Options need to be sufficiently distinct to highlight the different sustainability implications of each, so that meaningful comparisons can be made. The SEA Directive refers to "reasonable alternatives taking into account the objectives and the geographical scope of the plan."
5.4 The ODPM guide states that only reasonable, realistic and relevant options need to be put forward. Assuming that other elements of the objective remain unchanged, the reasonable alternatives will be those that "deliver sustainable housing development" "across North Somerset" "to meet housing needs".
5.5 The 2011 appraisal of Policy CS13 used six options, ranging from 6,711 to 26,750 dwellings and including the then preferred option of 13,400 . The six options were: the two different ways of defining 'no plan' ${ }^{\prime 0}$; the lower and upper figures suggested by Keith Woodhead ${ }^{11}$; rolling forward the Structure Plan figure ${ }^{12}$ incorporated into the Local Plan ('business as usual'); and the draft RSS figure

[^4](Proposed Changes, 2008) reflecting the most expansionist assessment of future demand.
5.6 The approach followed here is to maintain consistency with that previous work, adding four further options, being the range of housing requirement figures considered by the council in November 2013: the 14,000 figure previously adopted, the 17,130 'low' figure now favoured by the council and the 'mid' and 'high' figures produced from the work by Edge Analytics, 19,395 and 20,220. To some extent the figures now appraised are comparable in their outcomes with some of the earlier options (see Table 2 below). The three different scenarios produced by Edge incorporate different assumptions about future internal and international migration, which are explained in their report to the council ${ }^{13}$. The low figure ( 812 dpa ) is close to the council's housing trajectory figure for dwelling completions over the period 2006/07-2025/26, as referenced by Edge (806 dpa).
5.7 The report from Edge identifies nine scenarios in all, ranging from 243 dpa to $1,457 \mathrm{dpa}$. The four highest - which all exceed the 'high' figure being appraised have been discounted as undeliverable over the remaining plan period. The dwelling-led scenario - 806 dpa - is close enough to the 'low' figure not to be considered significantly different. The difference over the remaining plan period is now $6 \times 13$, or 78 dwellings. The final scenario - 243 dpa - is described as 'Net-Nil' and would only provide for natural change, with net migration at nil. This would result in a $1 \%$ fall in population but the demand for homes would continue to increase because of a falling average household size. Employment would fall as the population ages. A higher level of dependency would pose a severe challenge to the maintenance of the population's standard of living. This scenario is therefore also discounted.
5.8 Although any choice of scenario is set within the context of the plan period, to 2026, its effects if implemented will continue into the long term. Policy provides a cut-off, allowing options to be discounted as unreasonable in the short-term, but that cut-off does not exist in reality. If net in-migration is necessary to offset the economic effects of an ageing population, then if this remains so indefinitely, the population can only continue to rise, which is not sustainable environmentally. It is also the case that if a high housing figure in this Core Strategy exhausts the possibilities for locating development sustainably within North Somerset, this will make any replacement plan unsustainable if it too has to accommodate a growing population. And as with time, so with space. The plan is geographically limited to North Somerset, but its effects are not. An increased housing supply facilitates an increased population and so increased consumption of resources generally, including those drawn from outside North Somerset and outside the UK.

## 6. Appraising the strategic options

6.1 The four new options have been appraised against the 36 SA objectives (see Table 3 below). The results are shown in summary below (Table 4) and in detail in

[^5]Appendix 1. The tables combine Tasks B3, B4 and B5, which cover predicting and evaluating effects and mitigating any adverse effects / maximising beneficial effects.
6.2 Housing numbers are not wholly independent of spatial options.

Environmental constraints can suggest that North Somerset - or areas within it may be unsuitable for large-scale housing growth, which could be more appropriately located elsewhere or not at all. The appraisal has therefore been undertaken on the basis that spatial options follow a sequential approach, utilising previously developed land first. Higher housing numbers require larger allocations of greenfield land. It remains the case that lower housing numbers could be accommodated in a variety of ways and that, for example, reduced travel-to-work distance or avoidance of flood risk could be argued to outweigh urban regeneration or Green Belt protection. These are not judgments that the SA is able to make. Urban regeneration and Green Belt protection are prioritised because they reflect national policy and local preferences.
6.3 The spatial distribution of the housing requirement is known for Option A (as set out in the previously adopted CS14) and Option B (as set out in the Statement for Consultation) ${ }^{14}$. Spatial distributions do not exist for Options C and D. However, since the higher numbers rely on higher consumption of greenfield land, they are less constrained by specific locational opportunities and so their full environmental impact is less predictable.

[^6]Table 2: Comparison of 2011 and 2014 options

| 2011 option | 2014 option | Are they comparable? |
| :---: | :---: | :---: |
| 1: 6,711 | - | No - these options were included as 'no plan' options, which are not being taken forward. |
| 2: 7,353 | - |  |
| 3: 13,400 | $\begin{array}{\|l\|} \hline \text { A: } 14,000 \\ \text { CS13: } 4950+ \\ 9,050(603 \mathrm{pa}) \end{array}$ | Largely - addition of 600 dwellings was appraised as a Main Modification in 2012 and was considered not to result in significantly different effects. <br> Since 2012 it has become clear that housing delivery could significantly exceed 14,000, so while it remains a possible minimum aspiration it is now a less realistic option, particularly if plan-led development is to be preferred. |
| 4: 15,000 | $\begin{aligned} & \text { B: 17,130 } \\ & \text { Low: } 4950+ \\ & 12,180 \\ & (812 p a) \end{aligned}$ | Partly - but increase of 2,130 dwellings means that some additional environmental constraints are breached in terms of development outside established settlement boundaries. <br> The figure is close to the 17,171 dwellings identified in the 2011 SHLAA and is within $6 \%$ of the 18,099 for which provision is made by the Consultation Draft Sites and Policies Plan. |
| 5: 19,860 | $\begin{aligned} & \text { C: 19,395 } \\ & \text { Mid: } 4950+ \\ & 14,445 \\ & \text { (963pa) } \end{aligned}$ | Largely - difference is 465 dwellings. Option 5 rolled forward the JRSP annualised figure (993pa) for reference only, recognising that such a level of building reflected previously developed land opportunities at east Portishead (and subsequently the Weston Villages) that will not be repeated. Both figures are close to the overall potential supply over the CS period that is identified in the 2013 SHLAA ${ }^{15}$, namely 19,854 . |
| 6: 26,750 | $\begin{aligned} & \text { D: 20,220 } \\ & \text { High: } 4950+ \\ & 15,270 \\ & (1,018 p a) \end{aligned}$ | Partly - similar to previous option 5 (difference of 360 dwellings) but would require fewer environmental constraints to be breached than option 6. A slightly higher figure than option $6(26,800)$ has been identified as the level at which no improvement in self-containment in North Somerset is achieved over the plan period. The achievability of option 6 was doubted in 2011: evidence provided to the original Examination was that, given the lead-in times and infrastructure requirements of large strategic sites, it would be challenging to deliver anything above about 18,000 dwellings. A completion rate of 1,000 dwellings pa has not been achieved at any time during the recession (2008/09 onwards) and only 7 times in the past 20 years, and this would need to be delivered year on year. If option $D$ does represent a new upper limit of achievability, both the advantages and the disadvantages of large-scale development are reduced as compared to option 6. |

[^7]
## Table 3: Sustainability Appraisal objectives

## Environmental - protecting and managing the natural/cultural resource base of economic and

 social developmentEN1. Maximise self-containment of the urban areas.
EN2. Minimise average travel-to-work distance.
EN3. Limit rural development to that meeting local needs, or infrastructure needs unavoidably requiring a rural location.
EN4. Minimise loss of productive land, especially best and most versatile farmland.
EN5. Minimise flood risk.
EN6. Promote sustainable drainage and protect existing permeable surfaces.
EN7. Enable design to minimise resource use and contribution to greenhouse gas emissions.
EN8. Enable design to take account of higher temperatures and more extreme weather conditions.
EN9. Increase the life expectancy of buildings.
EN10. Achieve a net gain in cultural, heritage and landscape features and biodiversity of North Somerset.
EN11. Avoid major development in the most environmentally sensitive areas.
EN12. Avoid damage to irreplaceable valued features.

## Economic - promoting more sustainable patterns of production and consumption

EC1. Meet economic development needs, including sufficient new jobs to at least match the increase in homes.
EC2. Harness the particular economic opportunities of North Somerset.
EC3. Protect and expand opportunities for local businesses to utilise local resources, especially sustainable resources.
EC4. Maximise opportunities for regeneration and renewal within Weston-super-Mare, ahead of new development, especially ahead of major new housing.
EC5. Avoid prejudicing, by phasing or otherwise, the achievement of other sustainable development objectives for regeneration and quality of life.
EC6. Increase prosperity, especially in areas of concentrated disadvantage.
EC7. Make fuller use of urban spaces and promote a 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.
EC9. Increase ability to work from home.
EC10. Protect and expand genuine opportunities for small businesses.
EC11. Reduce queuing and over-crowding on the road and rail networks.
EC12. Locate new development on sites - and access them in ways - that will not add to traffic congestion.

Social - widening opportunities for all individuals and communities
SC1. Meet local needs locally.
SC2. Improve accessibility to service, retail, educational, leisure and social provision.
SC3. Increase opportunities for active lifestyles and sustainable outdoor leisure pursuits.
SC4. Develop a positive sense of place both physically and socially.
SC5. Promote positive wellbeing.
SC6. Reduce health inequalities.
SC7. Reduce crime and fear of crime, likewise anti-social behaviour.
SC8. Minimise risk to health and safety.
SC9. Avoid exposure to pollution/noise.
SC10. Meet housing requirement.
SC11. Narrow the gap between income and house prices/rents.
SC12. Improve the life chances of those living in areas of concentrated disadvantage.

Table 4: Appraisal Table Summary for Policy CS13: Scale of New Housing
The following codes are used:
++ $\quad$ positive in principle; no suggestions for enhancing effect
$+\quad$ positive but can be enhanced
$=$ mixed effect
? uncertain effect
0 no significant effect

- $\quad$ negative but can be mitigated


## -- $\quad$ negative in principle; no suggestions for mitigating effect

|  |  | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| OptionA:14,000 | EN | + | + | ++ | + | - | = | = | 0 | 0 | ? | ? | ? |
|  | EC | + | ++ | 0 | ++ | + | = | ? | ++ | ? | ? | + | + |
|  | SC | ? | + | + | + | ? | ? | 0 | 0 | 0 | -- | 0 | = |


|  |  | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Option <br> $\mathrm{B}:$ <br> 17,130 | $E N$ | + | + | -- | - | - | $=$ | $=$ | 0 | 0 | $?$ | $?$ | $?$ |
|  | $E C$ | + | ++ | 0 | ++ | + | $=$ | $?$ | ++ | $?$ | -- | - | -- |
|  |  | $S C$ | + | + | - | $=$ | $?$ | $?$ | 0 | 0 | 0 | ++ | 0 |


|  |  | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Option | $E N$ | + | + | - | -- | - | $=$ | $=$ | 0 | 0 | $?$ | $?$ | $?$ |
|  | C: | $E C$ | + | + | 0 | ++ | + | $=$ | $?$ | ++ | $?$ | - | - |
| 19,395 | $S C$ | + | + | - | $=$ | $?$ | $?$ | 0 | 0 | 0 | ++ | $?$ | $=$ |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |


|  |  | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Option D: <br> 20,220 | EN | + | ? | -- | -- | - | = | = | 0 | 0 | ? | ? | ? |
|  | EC | + | + | 0 | ++ | + | $=$ | ? | ++ | ? | -- | -- | - |
|  | SC | + | + | - | = | ? | ? | 0 | 0 | 0 | ++ | ? | = |

## Task B3 - predicting effects

## General commentary

6.4 Low growth options (A and B) perform best on certain environmental criteria, such as the protection of natural resources and sensitive environments, and on those relating to transport, this being because a lower population minimises congestion, although this is dependent on sufficient jobs being available locally. Demographic change is likely to reduce out-commuting by 2026. These options allow urban regeneration to go ahead, with the possibility of balancing the growth in homes and jobs and maybe even improving on the status quo. However, with all four options, the consequences for the environment include several that are mixed or uncertain.
6.5 High growth options (C and D) fail to deliver sustainable development because the risk is that the housing exceeds the locally available employment, resulting in increased out-commuting to where the jobs are and/or a growing proportion of the population who are not working, being either unemployed or retired. Demographic change is likely to reduce out-commuting by 2026, though the fall under the high growth options is not as substantial as under the low growth options. While physical regeneration may still occur, these options fail to deliver the goal of more selfcontained and self-supporting communities.

### 6.6 From an environmental perspective, too little development can have adverse

 consequences, although these are not as complex as the problems caused by too much development. Under-investment can lead to deterioration of the built environment and a spiral of decline that becomes difficult to reverse. However, new housing can only contribute positively by bringing into use vacant sites, or buildings to be converted from non-residential use. In other circumstances it can have a negative effect by diverting funds away from maintenance of the existing housing stock. Much physical decline, especially in Weston-super-Mare, has occurred despite very considerable housing growth on the peripheries. This is especially true of tourism-related assets, whose survival has little to do with housing unless a change of use becomes appropriate.6.7 From an economic perspective, housing is valued principally for its ability to house the workforce, although any increase in households will also generate sales of goods and services locally and the construction of homes too has a positive economic effect, albeit a transient, tokenistic one that may not have a strong local connection. Under-provision of housing during boom conditions can choke off growth but over-provision can have consequences damaging to business confidence as low demand housing is abandoned. A smaller economy provides fewer employment opportunities - and a smaller range of possible occupations - than a larger one does but it is a moot point whether net welfare is not maximised by less congestion, noise and stress.
6.8 From a social perspective, new homes meet demands for housing that are not being satisfactorily met from within the existing stock. Deficiencies may be qualitative - insufficient housing suitable for the elderly or disabled, or for large families - or quantitative - too few houses to match aspirations for separate household formation. However, some demand is for re-location to North Somerset
and simply building more homes does not guarantee that local residents will obtain priority. (Better training opportunities may have a greater effect in enabling residents to obtain better-paid jobs.) There are serious problems of definition with 'housing need' as a whole, which is potentially open-ended, and with 'local housing need' in particular, which depends upon the assumption that existing residents will wish to remain in the area. Large-scale private house-building could increase the supply of affordable housing reserved for people with local connections but comes at a social cost: under current policy, two market homes for each affordable one. A high housing number that does not reflect a realistic view of likely employment growth would most likely result in increased sales to retired in-migrants able to outbid prospective purchasers from within North Somerset. With increasing age, such purchasers ultimately add to the cost of local services borne by other residents ${ }^{16}$.
6.9 There can also be synergistic effects across all three perspectives. Too low a housing number, if it leads to a falling population, can bring about the loss of local facilities, including the jobs they provide, and cause residents to travel longer distances to use facilities that survive. However, this connection is not automatic, as facilities can sustain some retraction so long as it does not pass below critical thresholds. For example, the survival of village primary schools in North Somerset is not dependent on further housing development. Retraction can be easier to manage than expansion, especially if additional resources are not guaranteed.

## Commentary on specific impacts

6.10 Population Numbers/Distribution. If the rate of housebuilding is cut back, compared to recent years, then the environmental effects on North Somerset specifically are mostly positive but the population not accommodated will be displaced elsewhere, where negative effects may result. There are a very large number of options for accommodating population elsewhere, the area of search being no less than the rest of the planet. It is beyond the scope of this SA to assess whether the consequences overall are better or worse. In addition, the Core Strategy is based on meeting locally arising housing needs and makes no provision for 'overspill' from adjoining areas, although the adopted Bristol Core Strategy indicates that the city is planning to accommodate its housing needs within its boundaries. While this may seem, on both counts, to be straightforward 'nimbyism', it is a fact that no mechanism exists to ascertain and enforce an environmentally optimum distribution of population regionally, nationally or internationally. The South West is an area of environmental stress that has limited ability to accommodate additional population without breaching environmental limits ${ }^{17}$. Submission of the Core Strategy occurred before the 'duty to co-operate' on strategic matters ${ }^{18}$ came into force but the duty will apply to any future review.

[^8]6.11 All population growth increases the rate at which non-renewable resources are consumed, unless technological improvement proceeds at a faster rate. In general therefore, a net addition to housing stock will be a move away from sustainability, in environmental terms. This is because a larger population will tend to consume more resources and this is also true where a stable population is redistributed over a greater number of households, each separately equipped. The Brundtland definition ${ }^{19}$ of sustainable development requires both that the needs of the present are met and that the ability of future generations to meet their own needs is not compromised. The UK Sustainable Development Strategy ${ }^{20}$ states that for a policy to be sustainable it must respect all the guiding principles of that strategy, though some policies will place more emphasis on certain principles than on others.
6.12 Housing Affordability. The 2009 Strategic Housing Market Assessment ${ }^{21}$ identified a total annual net need for affordable housing of 904 dpa, which exceeds any realistic contribution from any of the options appraised here. The 2014 SHMA will review this finding. A number of potential broad socio-economic consequences of not being able to meet identified affordable housing need have been identified ${ }^{22}$. These include:

- increasing levels of overcrowding and sharing and concealed households leading to potential health and stress issues;
- growing social housing waiting lists and housing benefit bill for households supported in the private rented sector;
- employers finding it increasingly difficult to attract staff, particularly in lower paid roles;
- children having to live longer with their parents.

These consequences are not automatic for all areas. In North Somerset, for example, employers are competing in a sub-regional market and there would be environmental advantages if staff vacancies were filled by existing residents currently working elsewhere in the West of England.
6.13 The 2009 SHMA modelled the effects of different housing supply scenarios on affordability. Increased supply reduces house prices and improves affordability. Improved affordability in turn reduces need. However, the SHMA does emphasise that supply would have to be increased across the country to achieve these positive effects. Increasing supply across the Housing Market Area alone would have much less impact and very little impact if only applied within a single local authority area. In the circumstances, a single local planning authority can do little unilaterally to address structural affordability issues ${ }^{23}$. The house price to income ratio for North

[^9]Somerset is 3.83 , substantially the lowest of the four West of England areas ${ }^{24}$, which suggests that locally it is the higher priced housing that is lacking.
6.14 Additional housing has only a marginal effect on house prices and hence on affordability. The vast majority ( $80-90 \%$ ) of housing for sale at any one time is second-hand; new completions are competing for entry to this market and will be priced accordingly. Table 5 sets out past performance in North Somerset:

Table 5: New and second-hand homes: past performance

| Year | Housing stock at year end <br> Census-based estimate. 2001 Census figure for households used for 2000, new home sales per annum added to obtain subsequent years to 2009. 2011 Census figure for households used for 2010. | Number of home sales ${ }^{25}$ (\% of housing stock) \% estimated, based on column 2 | Turnover of private housing stock ${ }^{26}$ owneroccupied + private rented | New build sales ${ }^{27}$ (\% of housing stock) $\%$ estimated, based on column 2 | New build sales as \% of all sales ${ }^{28}$ |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 2000 | 79985 | $\begin{gathered} 1407 \\ (1.76 \%) \end{gathered}$ | 1.7\% | $\begin{gathered} 196 \\ (0.25 \%) \end{gathered}$ | 13.93 |
| 2001 | 80757 | $\begin{gathered} 5071 \\ (6.28 \%) \\ \hline \end{gathered}$ | 6.12\% | $\begin{gathered} 772 \\ (0.96 \%) \\ \hline \end{gathered}$ | 15.22 |
| 2002 | 81580 | $\begin{gathered} 5390 \\ (6.61 \%) \end{gathered}$ | 6.5\% | $\begin{gathered} 823 \\ (1.01 \%) \end{gathered}$ | 15.27 |
| 2003 | 82605 | $\begin{gathered} 5015 \\ (6.07 \%) \\ \hline \end{gathered}$ | 6.05\% | $\begin{gathered} 1025 \\ (1.24 \%) \\ \hline \end{gathered}$ | 20.44 |
| 2004 | 83461 | $\begin{gathered} 4898 \\ (5.87 \%) \\ \hline \end{gathered}$ | 5.91\% | $\begin{gathered} 856 \\ (1.03 \%) \\ \hline \end{gathered}$ | 17.48 |
| 2005 | 84460 | $\begin{gathered} 4573 \\ (5.41 \%) \\ \hline \end{gathered}$ | 5.52\% | $\begin{gathered} 999 \\ (1.18 \%) \\ \hline \end{gathered}$ | 21.85 |
| 2006 | 85362 | $\begin{gathered} 5855 \\ (6.86 \%) \\ \hline \end{gathered}$ | 7.06\% | $\begin{gathered} 902 \\ (1.06 \%) \\ \hline \end{gathered}$ | 15.41 |
| 2007 | 85874 | $\begin{gathered} 5523 \\ (6.43 \%) \end{gathered}$ | 6.66\% | $\begin{gathered} 512 \\ (0.6 \%) \end{gathered}$ | 9.27 |
| 2008 | 86270 | $\begin{gathered} 2397 \\ (2.78 \%) \\ \hline \end{gathered}$ | 2.89\% | $\begin{gathered} 396 \\ (0.46 \%) \\ \hline \end{gathered}$ | 16.52 |
| 2009 | 86662 | $\begin{gathered} 2836 \\ (3.27 \%) \\ \hline \end{gathered}$ | 3.42\% | $\begin{gathered} 392 \\ (0.45 \%) \end{gathered}$ | 13.82 |
| $\begin{aligned} & 2010 \\ & \text { (Nov) } \\ & \hline \end{aligned}$ | 91694 | $\begin{gathered} 1704 \\ (1.86 \%) \\ \hline \end{gathered}$ | 2.06\% | $\begin{gathered} 180 \\ (0.2 \%) \\ \hline \end{gathered}$ | 10.56 |

The above method of calculation is based on sales registered with the Land Registry and relies on a property being registered with the year built. Otherwise, it is assumed to be a resale. For this reason, numbers of new build sales will be significantly lower than those shown in new build completions records. There may also be a delay in converting completions into sales or vice versa.

[^10]Table 6: New homes under options A-D

| Option | Dwelling requirement | Housing stock 2026 (85833 <br> 29 <br> +dwelling requirement) <br> (\% increase in brackets) | Average <br> annual increase |
| :---: | :---: | :---: | :---: |
| A | 14000 | $99833(16.31 \%)$ | $603(0.70 \%)$ |
| B | 17130 | $102963(19.96 \%)$ | $812(0.95 \%)$ |
| C | 19395 | $105228(22.60 \%)$ | $963(1.12 \%)$ |
| D | 20220 | $106053(23.56 \%)$ | $1018(1.19 \%)$ |

6.15 Resource Use. The natural resource implications of different housing number scenarios can be calculated, as was done in the 2011 SA. This exercise has not been repeated for options $A$ to $D$ as it would simply quantify the point that larger populations consume more resources (see para. 6.11 above) and generate more waste, CO2, etc. than smaller ones and so, other things being equal, are less sustainable environmentally. This would not help in selecting a preferred option. The economic and social effects of a larger population are in theory that there is a larger pool of people - human resources - to support a wider range of commercial and voluntary activities. The ability to do so in practice depends on whether infrastructure, including soft infrastructure such as training opportunities, keeps pace with population, and ultimately on whether environmental capacity, locally or elsewhere, can support the basic needs of a larger population.
6.16 Agricultural Land. One environmental effect that can be readily predicted from housing numbers is agricultural land-take. Local planning authorities are asked by the NPPF (para. 112) to take into account the economic and other benefits of the best and most versatile agricultural land. The issue of long-term food security has been highlighted in a number of expert reports ${ }^{30}$.
6.17 The lower housing figures can be more easily accommodated on previously developed land (PDL), including Winterstoke Village (former Weston Airfield) and part of Parklands Village (former RAF Locking). The 2013 SHLAA identifies an overall potential supply over the CS period of 19,854 dwellings. Of this, 'identified potential' (site-specific provision not yet with planning permission agreed in principle) amounts to 8,113 dwellings, which compares well with the residual requirement (less commitments) associated with the 17,130 figure (Option B), of 8,084 (see Table 7 below). The identified potential comprises sites considered to have potential for development but with no guarantee that permission would be granted. Further work to identify the split between brownfield and greenfield reveals the following:
$\begin{array}{ll}\text { PDL: } & \text { 164.2ha } \\ \text { (brownfield) } & 4,418 \text { dwellings }\end{array}$
$\begin{array}{ll}\text { Non-PDL: } & \text { 199.1 ha } \\ \text { (greenfield) } & \text { 3,695 dwellings }\end{array}$
6.18 The land area for non-PDL is higher, reflecting the significant land potential identified in the countryside (and conversely a lower capacity for residential development across those countryside sites), though not all of these would be

[^11]expected to come forward. Therefore it cannot be assumed that the figures above reflect what is planned in the future but rather what the site potential, largely influenced by landowner aspirations, is showing. The position that is actually being planned for through the Sites and Policies Plan may be more favourable to PDL. The SHLAA figures assume some greenfield extensions to service villages and, in this context, because of the large sites coming forward and the very high dwelling figures being calculated, a nominal cut-off of 30 dwellings has been applied to each of these sites. In theory therefore there could be even greater number of dwellings attached to the non-PDL figures, though again balanced with the caveat that not all would be expected to come forward. The SHLAA is not comprehensive, but simply illustrates the range of opportunities which could be assessed, along with other sites, should additional housing sites be required as part of the plan-making process in the future.
6.19 Until 2003/04, greenfield land accounted for over half of housing completions in North Somerset, since when the proportion has dropped to as low as one-eighth (2006/07) but has since climbed again (see graph below). Higher housing growth has the potential effect of increasing greenfield land loss as compared to the previously adopted CS13. A detailed trajectory of the split between greenfield and previously developed land is not practical, given that the policies require the submission of supporting evidence and in some cases a specific site allocation, which will enable alternatives to be tested. However, it can be said that under all four options the emphasis placed on the Weston Villages and on urban regeneration will ensure that most new housing continues to be on previously developed land.

6.20 Even if PDL is prioritised, higher figures will exhaust the supply sooner and therefore have a greater negative impact on greenfield land (see Table 7). The SHLAA includes a figure of 1,820 for 'broad locations' for development 2019-2026. Adding this figure makes up most of the difference between Options B and C, though it can also be viewed as interchangeable with some of the identified potential, which may therefore not need to come forward. The broad locations mainly represent the continuation of trends currently accounted for as windfalls, so would be predominantly PDL. However, where they result from restructuring of businesses or services they may not themselves be consuming greenfield land but may have an
indirect effect in terms of greenfield land being released for new economic development or community facilities to replace older premises.

Table 7: Residual dwelling requirements, commitments and land availability

| Option | Dwelling requirement - completions = | - sites with pp agreed in principle ${ }^{31}=$ | Identified potential (PDL) + other $\text { SHLAA }^{32}=$ | Identified potential (non-PDL) | Surplus I shortfall ${ }_{33}$ (overall) | Surplus / shortfall (using PDL etc. only) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| A | $\begin{aligned} & 14000-5992 \\ & =8008 \end{aligned}$ | $-3054=4954$ | $\begin{gathered} 4418+ \\ 2695= \\ 7113 \end{gathered}$ | 3695 | $\begin{gathered} 10808= \\ 4954= \\ 5854 \end{gathered}$ | $\begin{gathered} 7113- \\ 4954= \\ 2159 \end{gathered}$ |
| B | $\begin{aligned} & 17130-5992 \\ & =11138 \end{aligned}$ | $-3054=8084$ | $\begin{gathered} 4418+ \\ 2695= \\ 7113 \end{gathered}$ | 3695 | $\begin{gathered} 10808- \\ 8084= \\ 2724 \end{gathered}$ | $\begin{gathered} 7113- \\ 8084= \\ -971 \end{gathered}$ |
| C | $\begin{aligned} & 19395-5992 \\ & =13403 \end{aligned}$ | $-3054=10349$ | $\begin{gathered} 4418+ \\ 2695= \\ 7113 \end{gathered}$ | 3695 | $\begin{gathered} 10808- \\ 10349= \\ 459 \end{gathered}$ | $\begin{gathered} 7113- \\ 10349= \\ -3236 \end{gathered}$ |
| D | $\begin{aligned} & 20220-5992 \\ & =14228 \end{aligned}$ | $-3054=11174$ | $\begin{gathered} 4418+ \\ 2695= \\ 7113 \end{gathered}$ | 3695 | $\begin{gathered} 10808- \\ 11174= \\ -366 \\ \hline \end{gathered}$ | $\begin{gathered} 7113- \\ 11174= \\ -4061 \end{gathered}$ |

6.21 Traffic. A further environmental consequence of higher housing numbers is the effect on road traffic. The combination of additional population and increased prosperity would lead to increased car use, and potentially congestion. Work for the Joint Local Transport Plan showed that congestion on target routes would increase even if likely transport improvements were implemented. It was predicted that by 2011, a $7 \%$ increase in car and bus travel would be accommodated but would be accompanied by a $14 \%$ increase in journey times ${ }^{34}$.
6.22 Increasingly-efficient technology may offset some of the additional resource consumption and carbon emissions but the scope for further technical improvements will diminish over time. Road and air transport's share of oil demand in Britain has risen to more than $50 \%$ of overall consumption ${ }^{35}$.
6.23 While it is possible for an increased population, located at transport nodes, to enhance the viability of public transport, including investment in new infrastructure, the funding packages involved can be complex and outcomes uncertain. The expansion of Portishead was accompanied by expectations that the railway to Bristol would be re-opened to passenger traffic but these expectations have yet to be met. Strategies dependent upon transforming infrastructure through large-scale development carry a high risk of stalling at an inconvenient point.

[^12]
## Task B4 - evaluating effects

6.24 This task requires us to say which of the effects will be significant.

Environmental significance is defined by reference to Annex II of the SEA Directive.
Policy CS13 on housing numbers has significant environmental effects because:

- the CS sets the framework for projects, including by influencing other plans and programmes, and integrates the relevant environmental considerations; and
- the developments it steers are likely to happen and to have effects that are irreversible, at least over the plan period, and also cumulative.

It is less likely to have adverse effects on especially valuable or vulnerable characteristics, including designated areas or landscapes or on human health, because these are effects that planning policy seeks to avoid. However, the higher the housing figure is set, the less scope there is to avoid these effects and the greater the pressure to seek trade-offs. Economic pressures may mean that these are less than comprehensive (see also 6.29 below).
6.25 The SEA Directive includes economic ('material assets') and social ('population') factors. Material assets are not defined but are commonly understood to include housing and service and social infrastructure and can also include previously developed land, minerals and 'environmental infrastructure' such as woodland, farmland and tourist facilities ${ }^{36}$. The economic and social effects of the different housing options are discussed above. It is difficult to identify effects that are economically significant or socially significant because the methods of environmental science do not transpose easily to these other aspects. Equivalent valuable or vulnerable characteristics, if they can be identified, would not appear to relate directly to housing numbers, though they might relate to housing mix.
6.26 The effects of the housing options are not exceptional. They range from those to be found throughout southern England to the more intense effects associated with growth areas. The strategic nature of the CS means that it is not possible to establish whether environmental quality standards or limit values are exceeded by any option. The rate of change, as such, is not an indicator of this and more detailed study is needed of the specific environments that change would affect. However, specific capacity concerns do exist in some parts of North Somerset with regard to traffic congestion ${ }^{37}$ and flood storage ${ }^{38}$. There are also concerns about the deliverability of higher numbers. Too high a number would produce the worst of all worlds - stalled regeneration on urban brownfield sites plus development on rural greenfield sites that could stall at an inconvenient point in the delivery of necessary associated infrastructure.

[^13]6.27 Concerns also exist with regard to the cumulative effect of development in this and other areas. In global or even national terms, North Somerset adds little to the problems of resource consumption but that is true of all areas; it is the summation of individually insignificant contributions that creates a significant total.

## Task B5 - mitigating/maximising effects

6.28 The Core Strategy is a self-contained document and so the policies themselves contain mitigation measures, where relevant. The Core Strategy is to be read as a whole, so the mitigation measures applicable to one policy may be set out in another.
6.29 Housing numbers as such do not allow for mitigation; this is done through other policies that specify how the numbers are to be delivered. Relevant matters could include location, density, tenure and design (e.g. sustainable construction). Developer contributions are also routinely sought towards the provision of infrastructure, including associated uses such as employment and community facilities. The relevant policies are set out in the Core Strategy and, pending its replacement by other planning documents, the Replacement Local Plan. However, the NPPF (paras. 173-177) now emphasises viability and deliverability, including the ability to facilitate development throughout the economic cycle. This may call into question how much mitigation is achievable, particularly in the early part of the remaining plan period.

## Task B6 - monitoring

6.30 Proposals for monitoring are set out in the North Somerset Core Strategy Monitoring Framework, produced as part of the 2011 SA. Monitoring of environmental effects will be integrated with local plan monitoring generally. The results will be published in the Annual Monitoring Report.

## Conclusions

6.31 The 2011 SA (Main Report - Appraisal Tables) set out the likely significant effects identified. Policy CS13 has been reappraised to relate to the range of housing requirement figures considered by the council in November 2013. The Core Strategy is a high-level strategic document. It relies upon subsequent documents to add detail and so many effects are uncertain at this stage.
6.32 The environmental effects of the four options are the most readily definable. They show that the optimum housing number is that which enables urban regeneration but is otherwise held to the minimum. Economic and social effects are much more speculative. Much of the evidence that exists is subject to assumptions on the future direction of market trends and so is not reliable in any scientific way.
6.33 Any figure higher than the minimum needed to secure urban regeneration would generate the environmental problems associated with housing growth without providing any direct additional environmental benefit. Additional development at Weston could help fund improved flood risk management infrastructure but this
development need not be residential and in terms of homes/jobs balance it is better that it not be. The sole environmental justification for the remainder of the housing number is the contribution of the Weston Villages (the former Weston Airfield and RAF Locking) to a level of employment growth beyond simply matching provision. It will be noted that Policy CS13 specified 14,000 as a minimum figure. If all urban regeneration sites were to be developed, including these two, this figure would be exceeded and so it allows a high degree of flexibility. The higher figures allow still more flexibility.
6.34 It is easier to justify additional housing that responds to the natural change element of population growth, though it is also possible to argue that out-migration is preferable to accommodating those for whom no work can be found locally. Inmigration that is not supported by employment growth is an unambiguous burden, either in terms of increased out-commuting or in terms of increased social care costs.

## PART III: CONSULTATION

## 7. Publication

7.1 The supplementary SA report is being published for comment alongside the council's proposed new housing requirement figure for the Core Strategy, consultation on which ran from Friday, 29 November 2013 to Friday, 17 January 2014. The SA consultation period is five weeks, opening on Monday, 27 January 2014 and closing at midnight on Friday, 28 February 2014.
7.2 Regulations require us to consult with the three statutory environmental agencies (English Heritage, Natural England and the Environment Agency). We also welcome comments from other sources.
7.3 Responses can be made by filling in the comments box online at www.nsomerset.gov.uk, by email to david.robins@n-somerset.gov.uk or by post to:

Planning Policy Team
North Somerset Council
Town Hall
Walliscote Grove Road
Weston-super-Mare
BS23 1UJ

## 8. Next steps

8.1 Comments received on the SA will be available to the Inspector conducting the re-opened independent Examination of the Core Strategy as part of the evidence base for the revision proposed to Policy CS13.
8.2 If significant defects in the SA are identified as a result of consultation, we will consider producing a further supplementary report to address these, where necessary to meet legal requirements.
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APPENDIX 1: Appraisal table for Policy CS13: Scale of New Housing

| SA Objectives | Operational definition/ targets | Can the effect be quantified? | Option | Effects over time | Comments/ explanation | Characteristics of likely significant effects | Adjustments |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| EN1. <br> Maximise selfcontainment of the urban areas. | Homes: jobs ratio (acknowledging that there is no guarantee that residents will take up local job opportunities) | Yes <br> (a). Number of economically active residents in settlement as ratio of jobs in settlement (Note: this does not measure selfcontainment as such, as jobs may be taken by incommuters) | A: 14,000 | + | Figure will allow a mix of employment and housing to come forward, at a ratio of 1.388 homes per job, increasing the district ratio from 1.02 to 1.07 as the population ages. The Statement for Consultation shows self-containment improving from 65\% in 2006 to $76 \%$ in 2026. However, as housing provision is now considered likely to significantly exceed this minimum, the ratio may be unrealistic unless additional jobs are created. Edge Analytics calculate that a 'Zero Jobs Growth' scenario requires 708 dpa, whereas Option A is for 603 dpa; improved selfcontainment would reduce this | Short to long term Permanent | Linking mechanism imperative to avoid imbalance (already adopted through Policy CS20) |

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|  |  |  |  |  | calculate that a 'Zero Jobs Growth' scenario requires 708 dpa, whereas Option C is for 963 dpa; improved selfcontainment would reduce this requirement. |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | D: 20,220 | + | Figure will allow a mix of employment and housing to come forward, at a ratio of 2 homes per job, increasing the district ratio from 1.02 to 1.14 as the population ages. The Statement for Consultation shows self-containment improving from 65\% in 2006 to $71 \%$ in 2026. <br> Edge Analytics calculate that a 'Zero Jobs Growth' scenario requires 708 dpa, whereas Option D is for 1,018 dpa; improved selfcontainment would reduce this requirement. | Short to long term <br> Permanent | Linking mechanism imperative to avoid imbalance (already adopted through Policy CS20) |
| EN2. <br> Minimise average travel-to-work distance. | Distance from major employment area | Yes <br> (a). Distance from centre point to Bristol/WsM or to employment site | A: 14,000 | + | Figure will allow a mix of employment and housing to come forward | Short to long term <br> Permanent | Linking mechanism imperative to avoid imbalance (already adopted through Policy CS20) |
|  |  | with estimated 1,000+ jobs <br> (b). Distance to | B: 17,130 | + | Figure will allow a mix of employment and housing to come | Short to long term <br> Permanent | Linking mechanism imperative to avoid imbalance (already |

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|  |  |  |  |  | allocations |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | D: 20,220 | -- | Figure cannot be accommodated without major greenfield allocations | Short to long term Permanent | X |
| EN4. <br> Minimise loss of productive land, especially best and most versatile farmland. | Loss of agricultural/forestry land | Yes <br> (a). Area of agricultural/forestry land developed (b). Area of BMV agricultural land developed | A: 14,000 | ++ | Figure can be accommodated without major greenfield allocations | Short to long term <br> Permanent | X |
|  |  |  | B: 17,130 | -- | Figure cannot be accommodated without major greenfield allocations | Short to long term Permanent | X |
|  |  |  | C: 19,395 | -- | Figure cannot be accommodated without major greenfield allocations | Short to long term Permanent | X |
|  |  |  | D: 20,220 | -- | Figure cannot be accommodated without major greenfield allocations | Short to long term <br> Permanent | X |
| EN5. <br> Minimise flood risk. | NPPF flood zone categorisation. <br> Note: Strategic Flood Risk Assessment refines approach. | Yes <br> (a). Area of land developed in flood zone 2 <br> (b). Area of land developed in flood zones 3a and 3b (c). Risk of flooding from additional runoff (+ve, -ve or neutral effect) | A: 14,000 | - | Key development opportunities involve land in FZ3a | Short to long term Permanent | Exception Test needed for development in FZ3a |
|  |  |  | B: 17,130 | - | Key development opportunities involve land in FZ3a | Short to long term <br> Permanent | Exception Test needed for development in FZ3a |
|  |  |  | C: 19,395 | - | Key development opportunities involve land in FZ3a | Short to long term Permanent | Exception Test needed for development in FZ3a |
|  |  |  | D: 20,220 | - | Key development opportunities involve land in FZ3a | Short to long term <br> Permanent | Exception Test needed for development in |

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|  |  |  |  |  |  |  | FZ3a |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| EN6. <br> Promote sustainable drainage and protect existing permeable surfaces. | Existence of SuDS opportunities (commentary). Effect on existing permeable surfaces. | Yes <br> (a). Existence of SuDS opportunities (+ve, -ve or neutral effect) <br> (b). Effect on existing permeable surfaces (+ve, -ve or neutral effect) | A: 14,000 | = | Key development opportunities involve building on permeable surfaces, though effects may be mitigated by SuDS | Short to long term <br> Permanent | Effects may be mitigated by SuDS |
|  |  |  | B: 17,130 |  | Key development opportunities involve building on permeable surfaces, though effects may be mitigated by SuDS | Short to long term <br> Permanent | Effects may be mitigated by SuDS |
|  |  |  | C: 19,395 | = | Key development opportunities involve building on permeable surfaces, though effects may be mitigated by SuDS | Short to long term <br> Permanent | Effects may be mitigated by SuDS |
|  |  |  | D: 20,220 | = | Key development opportunities involve building on permeable surfaces, though effects may be mitigated by SuDS | Short to long term <br> Permanent | Effects may be mitigated by SuDS |
| EN7. <br> Enable design to minimise resource use and contribution to greenhouse gas emissions. | Existence of opportunities (commentary), e.g. for CHP relative to location or scale | No <br> (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 | $=$ | Larger schemes have the potential to maximise energy efficiency, e.g. CHP, though any additional housing is likely to add to total energy demand even at the highest standards | Short to long term <br> Permanent | X |

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|  |  |  | B: 17,130 | = | Larger schemes have the potential to maximise energy efficiency, e.g. CHP, though any additional housing is likely to add to total energy demand even at the highest standards | Short to long term Permanent | X |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | C: 19,395 |  | Larger schemes have the potential to maximise energy efficiency, e.g. CHP, though any additional housing is likely to add to total energy demand even at the highest standards | Short to long term <br> Permanent | X |
|  |  |  | D: 20,220 |  | Larger schemes have the potential to maximise energy efficiency, e.g. CHP, though any additional housing is likely to add to total energy demand even at the highest standards | Short to long term <br> Permanent | X |
| EN8. <br> Enable design to take account of higher | Existence of opportunities (commentary), e.g. for adaptive design | No <br> (a). Existence of opportunities (+ve, -ve or neutral | A: 14,000 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | Indicates importance of open space/ landscaping provision |
| temperatures and more extreme weather conditions. | relative to location or scale. More light surfaces, green space and water features |  | B: 17,130 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | Indicates importance of open space/ landscaping provision |
|  | needed to address urban heat island effect. |  | C: 19,395 | 0 | Housing numbers are unlikely to influence whether | No significant effect | Indicates importance of open space/ landscaping |

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|  |  |  |  |  | this objective is met |  | provision |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | D: 20,220 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | Indicates importance of open space/ landscaping provision |
| EN9. Increase the life expectancy of buildings. | Existence of opportunities (commentary), e.g. relative to location or scale, including retention of energy embedded in existing buildings | No <br> (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 | 0 | Housing figures within the range derived locally represent a match of provision to need, in quantitative terms. The existing stock will therefore continue to perform its current role. Over-provision of new housing would lead to demolition or change of use of existing housing in lower demand areas. | No significant effect | Avoidance of demolition may require strategies for encouraging change of use where suitable or prioritising demolition of housing least suitable for other uses |
|  |  |  | B: 17,130 | 0 | Housing figures within the range derived locally represent a match of provision to need, in quantitative terms. The existing stock will therefore continue to perform its current role. Over-provision of new housing would lead to demolition or change of use of existing housing in lower demand areas. | No significant effect | Avoidance of demolition may require strategies for encouraging change of use where suitable or prioritising demolition of housing least suitable for other uses |
|  |  |  | C: 19,395 | 0 | Housing figures within the range derived locally represent a match of | No significant effect | Avoidance of demolition may require strategies for encouraging |

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|  |  |  |  |  | provision to need, in quantitative terms. The existing stock will therefore continue to perform its current role. Over-provision of new housing would lead to demolition or change of use of existing housing in lower demand areas. |  | change of use where suitable or prioritising demolition of housing least suitable for other uses |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | D: 20,220 | 0 | Housing figures within the range derived locally represent a match of provision to need, in quantitative terms. The existing stock will therefore continue to perform its current role. Over-provision of new housing would lead to demolition or change of use of existing housing in lower demand areas. | No significant effect | Avoidance of demolition may require strategies for encouraging change of use where suitable or prioritising demolition of housing least suitable for other uses |
| EN10. <br> Achieve a net gain in cultural, | Existence of opportunities (commentary), e.g. | No <br> (a). Existence of opportunities | A: 14,000 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
| heritage and landscape features and | relative to location or scale | (+ve, -ve or neutral effect) | B: 17,130 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
| biodiversity of North Somerset. |  |  | C: 19,395 | ? | Effects dependent on detailed location and design | Uncertain effect | X |

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|  |  |  | D: 20,220 | ? | Effects dependent on detailed location and design. Scale of offset needed to compensate for landscape loss potentially very considerable. | Uncertain effect | X |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| EN11. <br> Avoid major development in the most environmentally sensitive areas. | Effect on national and local designations and on tranquillity/dark skies | No <br> (a). Effect on national designations (+ve, -ve or neutral effect) <br> (b). Effect on local designations (+ve, -ve or neutral effect) <br> (c). Effect on tranquillity/dark skies (+ve, -ve or neutral effect) | A: 14,000 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
|  |  |  | B: 17,130 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
|  |  |  | C: 19,395 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
|  |  |  | D: 20,220 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
| EN12. <br> Avoid damage to irreplaceable valued features. | Effect on national and local designations, excluding effects that can be satisfactorily mitigated by alternative provision | No <br> (a). Effect on national designations (+ve, -ve or neutral effect) <br> (b). Effect on local designations (+ve, -ve or neutral effect) | A: 14,000 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
|  |  |  | B: 17,130 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
|  |  |  | C: 19,395 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
|  |  |  | D: 20,220 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
| EC1. <br> Meet economic development needs, including sufficient new jobs to at least | Homes: jobs ratio (acknowledging that there is no guarantee that residents will take up local job opportunities) | (a). Number of additional economically active residents in settlement as ratio of additional jobs in | A: 14,000 | + | Figure will allow a mix of employment and housing to come forward, at a ratio of 1.388 homes per job, increasing the | Short to long term Permanent | Linking mechanism imperative to avoid imbalance (already adopted through Policy CS20) |

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| match the increase in homes. |  | settlement (Note: this does not measure selfcontainment as such, as jobs may be taken by incommuters) |  |  | district ratio from 1.02 to 1.07 as the population ages. The Statement for Consultation shows self-containment improving from 65\% in 2006 to $76 \%$ in 2026. However, as housing provision is now considered likely to significantly exceed this minimum, the ratio may be unrealistic unless additional jobs are created. Edge Analytics calculate that a 'Zero Jobs Growth' scenario requires 708 dpa, whereas Option A is for 603 dpa; improved selfcontainment would reduce this requirement. |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | B: 17,130 |  | Figure will allow a mix of employment and housing to come forward, at a ratio of 1.696 homes per job, increasing the district ratio from 1.02 to 1.10 as the population ages. The Statement for Consultation shows self-containment improving from 65\% in 2006 to $74 \%$ in 2026. | Short to long term Permanent | Linking mechanism imperative to avoid imbalance (already adopted through Policy CS20) |

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|  |  |  |  |  | Edge Analytics calculate that a 'Zero Jobs Growth' scenario requires 708 dpa, whereas Option B is for 812 dpa; improved selfcontainment would reduce this requirement. |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | $\text { C: } 19,395$ | + | Figure will allow a mix of employment and housing to come forward, at a ratio of 1.92 homes per job. The Statement for Consultation shows self-containment improving from 65\% in 2006 to between $71 \%$ and $74 \%$ in 2026. <br> Edge Analytics calculate that a 'Zero Jobs Growth' scenario requires 708 dpa, whereas Option C is for 963 dpa; improved selfcontainment would reduce this requirement. | Short to long term <br> Permanent | Linking mechanism imperative to avoid imbalance (already adopted through Policy CS20) |
|  |  |  | D: 20,220 | + | Figure will allow a mix of employment and housing to come forward, at a ratio of 2 homes per job, increasing the district ratio from 1.02 to 1.14 as the population ages. <br> The Statement for | Short to long term <br> Permanent | Linking mechanism imperative to avoid imbalance (already adopted through Policy CS20) |

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|  |  |  |  |  | Consultation shows self-containment improving from 65\% in 2006 to $71 \%$ in 2026. <br> Edge Analytics calculate that a 'Zero Jobs Growth' scenario requires 708 dpa, whereas Option D is for 1,018 dpa; improved selfcontainment would reduce this requirement. |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| EC2. <br> Harness the particular economic opportunities of North Somerset. | Existence of opportunities (commentary), e.g. relative to location or scale | (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 | ++ | Housing growth will proceed in line with expected employment growth. Flexibility if growth is higher is provided because CS13 expresses figure as a minimum. | Short to long term Permanent | X |
|  |  |  | B: 17,130 | ++ | Housing growth will proceed in line with expected employment growth | Short to long term <br> Permanent | X |
|  |  |  | C: 19,395 | + | Although housing growth will enable economic opportunities to be taken up this may be inhibited by other effects such as congestion | Short term: commuting expected to decrease in line with working population as population ages <br> Temporary | Particular need for monitoring to identify any adverse impacts |
|  |  |  | D: 20,220 | + | Although housing growth will enable economic opportunities to be | Short term: commuting expected to decrease in line | Particular need for monitoring to identify any adverse impacts |

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|  |  |  |  |  | taken up this may be inhibited by other effects such as congestion | with working population as population ages <br> Temporary |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| EC3. <br> Protect and expand opportunities for local businesses to utilise local resources, especially sustainable resources. | Existence of opportunities (commentary), e.g. relative to location or scale | (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | X |
|  |  |  | B: 17,130 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | X |
|  |  |  | C: 19,395 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | X |
|  |  |  | D: 20,220 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | X |
| EC4. <br> Maximise opportunities for regeneration and renewal within Weston-superMare, ahead of new development, especially ahead of major new housing. | Existence of opportunities (commentary), e.g. relative to location or scale | (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 | ++ | Numbers allow for significant urban regeneration | Short to long term <br> Permanent | X |
|  |  |  | B: 17,130 | ++ | Numbers allow for significant urban regeneration | Short to long term <br> Permanent | X |
|  |  |  | C: 19,395 | ++ | Numbers allow for significant urban regeneration | Short to long term <br> Permanent | X |
|  |  |  | D: 20,220 | ++ | Numbers allow for significant urban regeneration | Short to long term <br> Permanent | X |
| EC5. <br> Avoid prejudicing, by phasing or otherwise, the achievement of other sustainable development objectives for | Existence of constraints (commentary), e.g. relative to location or scale | (a). Existence of constraints (+ve, -ve or neutral effect) | A: 14,000 | + | New facilities can be funded from developer contributions, proportionate to the scale of new development | Short to long term <br> Permanent | Some facilities may also benefit existing residents of North Somerset. Tariff could be designed to prioritise these. |
|  |  |  | B: 17,130 | + | New facilities can be | Short to long term | Some facilities may |

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|  |  |  |  |  | needs. <br> Opportunities to participate in society are unlikely to be affected as social dynamics are not directly related to population size. |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | D: 20,220 | ++ | Higher housing and therefore population - figures imply greater diversity of economic needs. <br> Opportunities to participate in society are unlikely to be affected as social dynamics are not directly related to population size. | Short to long term <br> Permanent | X |
| EC9. Increase ability to work from home. | Existence of opportunities (commentary), e.g. relative to location or scale | (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
|  |  |  | B: 17,130 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
|  |  |  | C: 19,395 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
|  |  |  | D: 20,220 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
| EC10. <br> Protect and expand genuine opportunities for small businesses. | Existence of opportunities (commentary), e.g. relative to location or scale | (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 | ? | Effects dependent on detailed location and design | Uncertain effect | X |
|  |  |  | B: 17,130 | -- | Housing growth in excess of local employment opportunities would increase pressure on | Short to long term <br> Permanent | X |

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|  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |

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|  |  |  |  |  | commuting, adding to pressure on transport infrastructure | decrease in line with working population as population ages <br> Temporary | development were located close to Bristol and served by new transport infrastructure but (a) deliverability of this is questionable and (b) other spatial options also exist. |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| SC1. <br> Meet local needs locally. | Existence ofopportunities(commentary), e.g.relative to location orscale | (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 | ? | Local housing needs would only be met if those in need locally were able to outbid in-migrants or were able to benefit from local occupancy controls. Affordable housing provision would be <180 a year. | Uncertain effect | X |
|  |  |  | B: 17,130 |  | Local housing needs would only be met if those in need locally were able to outbid in-migrants or were able to benefit from local occupancy controls. Increased provision would allow higher numbers of affordable homes (<245 a year) to be delivered. | Short to long term <br> Permanent | Increased affordable housing provision depends on overall deliverability and relies upon large sites offering $30 \%$ affordable housing |
|  |  |  | C: 19,395 | + | Local housing needs would only be met if those in need locally were able to outbid in-migrants or were able to benefit from local occupancy | Short to long term Permanent | Increased affordable housing provision depends on overall deliverability and relies upon large sites offering $30 \%$ |

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|  |  |  |  |  | controls. Increased provision would allow higher numbers of affordable homes (<290 a year) to be delivered. |  | affordable housing |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | D: 20,220 | + | Local housing needs would only be met if those in need locally were able to outbid in-migrants or were able to benefit from local occupancy controls. Increased provision would allow higher numbers of affordable homes (<305 a year) to be delivered. | Short to long term <br> Permanent | Increased affordable housing provision depends on overall deliverability and relies upon large sites offering $30 \%$ affordable housing |
| SC2. <br> Improve accessibility to service, retail, educational, leisure and social provision. | Average distance to facilities, making appropriate assumptions on additional provision as part of development | (a). Distance to post office <br> (b). Distance to bank/ATM <br> (c). Distance to supermarket <br> (d). Distance to | A: 14,000 | + | New facilities can be funded from developer contributions, proportionate to the scale of new development | Short to long term <br> Permanent | Some facilities may also benefit existing residents of North Somerset. Tariff could be designed to prioritise these. |
|  |  | local centre <br> (e). Distance to nearest comparison centre (f). Distance to nearest regional centre | B: 17,130 | + | New facilities can be funded from developer contributions, proportionate to the scale of new development | Short to long term <br> Permanent | Some facilities may also benefit existing residents of North Somerset. Tariff could be designed to prioritise these. |
|  |  | (g). Distance from centre point to primary school (h). Distance to secondary school <br> (i). Quality of | C: 19,395 | + | New facilities can be funded from developer contributions, proportionate to the scale of new | Short to long term <br> Permanent | Some facilities may also benefit existing residents of North Somerset. Tariff could be designed to |

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|  |  | (j). Quality of secondary school <br> (k). Distance to library <br> (I). Distance to cinema (m). Distance to theatre <br> ( n ). Distance to community centre (o). Distance to health care facility (p). Distance to hospital (A\&E) | D: 20,220 | + | development <br> New facilities can be funded from developer contributions, proportionate to the scale of new development | Short to long term <br> Permanent | prioritise these. <br> Some facilities may also benefit existing residents of North Somerset. Tariff could be designed to prioritise these. |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| SC3. <br> Increase opportunities for active lifestyles and sustainable outdoor leisure pursuits. | Availability of footpaths, cycleways, accessible open space, making appropriate assumptions on additional provision as part of development | (a). Extent of footpath links per km <br> (b). Quality of footpath links <br> (c). Access to cycle path network <br> (d). Cycle path network quality <br> (e). Distance to public park <br> (f.) Distance to indoor leisure centre <br> (g). Distance to public green space <br> (h). Distance to outdoor playing fields <br> (i). Availability of children's play area | A: 14,000 | + | New housing is likely to be designed for sustainable living but opportunities for those remaining in existing housing will be unchanged. | Short to long term <br> Permanent | Strategy could consider how new housing is integrated into older areas to create wider community benefits, e.g. strategic cycle routes |
|  |  |  | B: 17,130 |  | Higher housing numbers require loss of greenfield land, including public recreational access | Short to long term <br> Permanent | Development on greenfield land needs to offset loss of recreational access, which could severely limit gross density, thus increasing loss of greenfield land if numbers are to be met |
|  |  |  | C: 19,395 |  | Higher housing numbers require loss of greenfield land, including public recreational access | Short to long term Permanent | Development on greenfield land needs to offset loss of recreational access, which could severely limit gross density, thus |

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|  |  |  |  |  |  |  | increasing loss of greenfield land if numbers are to be met |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | D: 20,220 |  | Higher housing numbers require loss of greenfield land, including public recreational access | Short to long term Permanent | Development on greenfield land needs to offset loss of recreational access, which could severely limit gross density, thus increasing loss of greenfield land if numbers are to be met |
| SC4. <br> Develop a positive sense place both physically and socially. | Existence of opportunities (commentary), e.g. relative to location or scale | (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 | + | Numbers do not require major new settlements or urban extensions - Weston Villages already agreed in principle. Likely concentrations of new housing form well-defined blocks. Social development requires significant resourcing. | Short to long term Permanent | For larger developments, social development requires particular attention |
|  |  |  | B: 17,130 |  | Higher housing numbers allow for greater design flexibility - within tighter landscape constraints - but social development requires significant resourcing. May lead to skewed demography in longer term as development ages uniformly. | Short to long term Permanent | For larger developments, social development requires particular attention |

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|  |  |  | C: 19,395 | = | Higher housing numbers allow for greater design flexibility - within tighter landscape constraints - but social development requires significant resourcing. May lead to skewed demography in longer term as development ages uniformly. | Short to long term Permanent | For larger developments, social development requires particular attention |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | D: 20,220 |  | Higher housing numbers allow for greater design flexibility - within tighter landscape constraints - but social development requires significant resourcing. May lead to skewed demography in longer term as development ages uniformly. | Short to long term <br> Permanent | For larger developments, social development requires particular attention |
| SC5. <br> Promote positive wellbeing. | Existence of opportunities (commentary), e.g. relative to location or scale. <br> 'Positive wellbeing' goes beyond absence of illness. The relevant policy interventions are primarily economic and social, outside the planning system. In the environmental | (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 | ? | Stress would be reduced if people are provided with housing more appropriate to their needs but the housing numbers alone do not guarantee this. Higher housing numbers do imply greater pressure on countryside and social infrastructure | Uncertain effect | X |

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|  | and fully functioning environment) <br> - access to recycling facilities and other means of contributing to 'making a difference' |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| SC6. Reduce health inequalities. | Existence of opportunities (commentary), e.g. relative to location or scale | (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 | ? | Stress would be reduced if people are provided with housing more appropriate to their needs but the housing numbers alone do not guarantee this. | Uncertain effect | X |
|  |  |  | B: 17,130 | ? | Stress would be reduced if people are provided with housing more appropriate to their needs but the housing numbers alone do not guarantee this. | Uncertain effect | X |
|  |  |  | C: 19,395 | ? | Stress would be reduced if people are provided with housing more appropriate to their needs but the housing numbers alone do not guarantee this. | Uncertain effect | X |
|  |  |  | D: 20,220 | ? | Stress would be reduced if people are provided with housing more appropriate to their | Uncertain effect | X |

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|  |  |  |  |  | needs but the housing numbers alone do not guarantee this. |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| SC7. <br> Reduce crime and fear of crime, likewise antisocial behaviour. | Existence of opportunities (commentary), e.g. relative to location or scale | (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | X |
|  |  |  | B: 17,130 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | X |
|  |  |  | C: 19,395 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | X |
|  |  |  | D: 20,220 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | X |
| SC8. Minimise risk to health and safety. | Existence of opportunities (commentary), e.g. relative to location or scale | (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | X |
|  |  |  | B: 17,130 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | X |
|  |  |  | C: 19,395 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | X |
|  |  |  | D: 20,220 | 0 | Housing numbers are unlikely to influence whether this objective is met | No significant effect | X |
| SC9. <br> Avoid exposure to pollution/noise. | Existence of opportunities (commentary), e.g. relative to location or scale | (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 | 0 | Effects dependent on detailed location and design | No significant effect | X |
|  |  |  | B: 17,130 | 0 | Effects dependent on detailed location | No significant effect | X |

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| prices/rents. | scale |  | B: 17,130 | 0 | Average annual increment on 2011 housing stock: 812 (0.89\%) | No significant effect ( $<1 \%$ ) | X |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | C: 19,395 | ? | Average annual increment on 2011 housing stock: 963 (1.05\%) | Uncertain effect: depends on housing mix | X |
|  |  |  | D: 20,220 | ? | Average annual increment on 2011 housing stock: 1,018 (1.11\%) | Uncertain effect: depends on housing mix | X |
| SC12. <br> Improve the life chances of those living in areas of concentrated disadvantage. | Existence of opportunities (commentary), e.g. relative to location or scale | (a). Existence of opportunities (+ve, -ve or neutral effect) | A: 14,000 |  | Housing growth generally will allow for additional affordable housing (target currently $30 \%$ ) but resultant larger workforce could depress wage rates | Short to long term Permanent | X |
|  |  |  | B: 17,130 |  | Housing growth generally will allow for additional affordable housing (target currently $30 \%$ ) but resultant larger workforce could depress wage rates | Short to long term Permanent | X |
|  |  |  | C: 19,395 | $=$ | Housing growth generally will allow for additional affordable housing (target currently $30 \%$ ) but resultant larger workforce could depress wage rates | Short to long term Permanent | X |
|  |  |  | D: 20,220 | = | Housing growth generally will allow | Short to long term | X |

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|  |  |  |  | for additional <br> arfordable housing <br> (target currently <br> $30 \%)$ but resultant | Permanent |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- | :--- |
| larger workforce |  |  |  |  |  |
| cold depress wage |  |  |  |  |  |
| rates |  |  |  |  |  |$\quad .$|  |
| :--- |
|  |

## APPENDIX 2: Compliance with SEA requirements

References to 'Annex 1' are to Annex 1 of the SEA Directive

| Source | Requirements | Compliance | Notes |
| :--- | :--- | :--- | :--- |
| Annex 1 (a) | Provide an outline of the <br> contents, main objectives <br> of the plan or programme <br> and relationship with <br> other relevant plans and <br> programmes | SA Main Report <br> 2011, Appendix 3 |  <br> Initiatives <br> Document |
| Annex 1 (b) | Provide information on <br> the relevant aspects of <br> the current state of the <br> environment and the <br> likely evolution thereof <br> without implementation of <br> the plan or programme | Topic Papers <br> SA Main Report <br> 2011, Appendix 4 |  |
| Annex 1 (c) | Provide information on <br> the environmental <br> characteristics of areas <br> likely to be significantly <br> affected | Topic Papers |  |
| Annex 1 (d) | Provide information on <br> any existing <br> environmental problems <br> which are relevant to the <br> plan or programme <br> including, in particular, <br> those relating to any <br> areas of a particular <br> environmental <br> importance | SA Template <br> See also <br> Habitats <br> Regulations <br> Assessment |  |
| Annex 1 (f) | Provide information on <br> the likely significant <br> effects (see below), <br> including on issues listed | Appraisal Table <br> (Appendix 1 <br> above) |  |
| Arovide information on <br> the environmental <br> protection objectives, <br> established at <br> international, Community <br> or Member State level, <br> which are relevant to the <br> plan or programme and <br> the way those objectives <br> and any environmental <br> considerations have <br> been taken into account | Strategies \& Main Report <br> 2011, Section 3 | Initiatives <br> Document |  |




| issues to include | the likely significant effects on biodiversity, fauna and flora |  | EN11, EN12 |
| :---: | :---: | :---: | :---: |
|  | Provide information on the likely significant effects on population and human health |  | $\begin{aligned} & \text { Objectives SC3, SC5, } \\ & \text { SC6, SC7, SC8, SC9, } \\ & \text { SC10, SC12 } \end{aligned}$ |
|  | Provide information on the likely significant effects on soil |  | Objectives EN4, SC9 |
|  | Provide information on the likely significant effects on water |  | Objectives EN5, EN6, EN7, SC9 |
|  | Provide information on the likely significant effects on air |  | Objective SC9 |
|  | Provide information on the likely significant effects on climatic factors |  | Objectives EN1, EN2, EN3, EN7, EN8 |
|  | Provide information on the likely significant effects on material assets |  | Objectives EN4, EN9, EC2, EC4, EC7, EC9, EC11, SC4, SC10 |
|  | Provide information on the likely significant effects on cultural heritage including architectural and archaeological heritage |  | Objectives EN10, EN11, EN12 |
|  | Provide information on the likely significant effects on landscape |  | Objectives EN10, EN11, EN12 |
|  | Provide information on the likely significant effects on the interrelationship between the above factors |  | The Appraisal Table refers to cross-cutting issues where relevant |
| Annex 1 (g) | Provide information on the measures envisaged to prevent, reduce, and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme |  | The Appraisal Table makes judgements on the extent to which the policy seeks to minimise negative effects. Where possible, it also suggests possible improvements to the revised wording. Improvements to other options are not suggested, as these are not options that we plan |


|  |  |  | to take forward. <br> Where no entry is made in the 'Adjustments' column it is marked with an ' $X$ ' to demonstrate that the matter has been considered but no change identified. |
| :---: | :---: | :---: | :---: |
| Annex 1 (h) | Provide an outline of the reasons for selecting the alternatives dealt with | SA Main Report 2011, Section 5; Appendix 10. SA <br> Supplementary Report 2014, Section 5 |  |
|  | Provide a description of how the assessment was undertaken including any difficulties encountered in compiling the required information | SA Main Report 2011, Section 6. SA <br> Supplementary Report 2014, Section 3 |  |
| Annex 1 (i) | Provide a description of the measures envisaged concerning monitoring in accordance with Article 10 | SA Main Report 2011, Section 7; Monitoring Framework |  |
| Annex 1 (j) | Provide a non-technical summary of the information provided under the above headings | Non-technical summary (SA Main Report 2011 and SA Supplementary Report 2014) |  |

This publication is available in large print, Braille or audio formats on request.

Help is also available for people who require council information in languages other than English.

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[^0]:    ${ }^{1}$ Annex 1 (j)
    ${ }^{2}$ http://www.n-somerset.gov.uk/Environment/Planning policy and-
    research/localplanning/Documents/Core\%20Strategy/sustainability\%20appraisal\%20(pdf).pdf
    ${ }^{3}$ These Directives are known as the Birds Directive (79/409/EEC) and the Habitats Directive (92/43/EEC).
    ${ }^{4}$ The footnote to Annex 1 states that "These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects."

[^1]:    ${ }^{5}$ http://www.n-somerset.gov.uk/Environment/Planning policy andresearch/localplanning/Documents/Core\%20Strategy/sustainability\%20appraisal\%20(pdf).pdf ${ }^{6}$ http://www.n-somerset.gov.uk/Environment/Planning policy andresearch/localplanning/Documents/Core\%20Strategy/ED38\%20SA\%20and\%20HRA\%20statement\%2 0(pdf).pdf

[^2]:    ${ }^{7}$ http://consult-ldf.n-somerset.gov.uk/consult.ti/CoreStrategyCD/consultationHome

[^3]:    ${ }^{8}$ ODPM (2005), A Practical Guide to the Strategic Environmental Assessment Directive https://www.gov.uk/government/uploads/system/uploads/attachment data/file/7657/practicalguidesea. pdf

[^4]:    ${ }^{9}$ CS Priority Objective 1
    10 'Minimise change - revoke RLP allocations' and 'No further action - abandon LDF'
    ${ }^{11}$ Keith Woodhead (2010), North Somerset Council: Determining a locally derived District Core Strategy housing requirement to 2026: Stage 2 Report
    ${ }^{12}$ Joint Replacement Structure Plan (2002), Policy 33

[^5]:    ${ }^{13}$ http://www.n-somerset.gov.uk/Environment/Planning policy andresearch/localplanning/Documents/Core\%20Strategy/Edge\%20Demographic\%20analysis\%20forecast s\%20(pdf).pdf

[^6]:    ${ }^{14}$ http://www.n-somerset.gov.uk/Environment/Planning policy andresearch/localplanning/Documents/Core\%20Strategy/North\%20Somerset\%20statement\%20for\%20co nsultation\%20November\%202013\%20(pdf).pdf

[^7]:    ${ }^{15}$ http://www.n-somerset.gov.uk/Environment/Planning policy and-research/localplanning/Pages/Strategic-housing-land-availability-assessment-FAQs.aspx\#e

[^8]:    ${ }^{16}$ The evidence paper, North Somerset Population Profile: Older People (NSC, 2010) shows that, currently, the 65+ age group make up a smaller percentage (15\%) of net in-migration than of the existing population $(20 \%)$. This will in future be affected by economic factors such as the level of economic growth.
    ${ }^{17}$ Land Use Consultants (2008), South West Regional Spatial Strategy Proposed Changes Sustainability Appraisal Final Report, pp 236-239
    ${ }^{18}$ Localism Act 2011, section 110

[^9]:    ${ }^{19}$ Brundtland Commission (1987): "development that meets the needs of the present without compromising the ability of future generations to meet their own needs"
    ${ }^{20}$ HM Government (2005), Securing the Future, p 17
    ${ }^{21}$ http://www.westofengland.org/planning--housing/housing-market-partnership/strategic-housing-market-assessment
    ${ }^{22}$ Bristol City Council (2010), Position Paper: Bristol Core Strategy Overall Housing Provision, para. 4.5 (quoting West of England Strategic Housing Market Assessment and National Housing and Planning Advice Unit)
    ${ }^{23}$ Bristol City Council (2010), Position Paper: Bristol Core Strategy Overall Housing Provision, paras. 3.8, 3.36

[^10]:    ${ }^{24}$ Audit Commission area profiles
    ${ }^{25}$ Land Registry data
    ${ }_{27}^{26}$ Land Registry data
    ${ }^{27}$ Land Registry data
    ${ }^{28}$ Land Registry data

[^11]:    ${ }^{29}$ There were 79,985 households in North Somerset at the 2001 Census. Adding 5,848 net completions between 2001 and 2006 gives a CS base figure of 85,833 . This method of calculation differs from that used in Table 5 but uses more comparable data.
    ${ }^{30}$ References were given in the 2011 SA.

[^12]:    ${ }^{31} 3054=1972+1082$ (2013 SHLAA Land Availability Summary, D and E)
    ${ }^{32} 2695=130+745+1820$ (2013 SHLAA Land Availability Summary I, J and K)
    ${ }^{33} 10808=7113+3695$
    ${ }^{34}$ West of England Partnership Joint Transport Team, Congestion Delivery Plan (June 2007), paras. 1.7, 2.8
    ${ }^{35}$ Economic and Social Research Council (2010), Britain in 2011, p 11

[^13]:    ${ }^{36} \mathrm{http}: / / w w w . c c w . g o v . u k / l a n d s c a p e--$ wildlife/managing-land-and-sea/environmental-assessment/strategic-environmental-assess.aspx?lang=en
    ${ }^{37}$ Joint Local Transport Plan (2006/07-2010/11), Fig. 3.2
    ${ }^{38}$ Approximately $30 \%$ of North Somerset is in Flood Zones 2 and 3 (see North Somerset Strategic Flood Risk Assessment, Level 1 Report (2008), p 35). Among English local authority areas, North Somerset ranks second in terms of properties at risk (see http://news.bbc.co.uk/1/hi/sci/tech/8107920.stm).

