

Date: 27 February 2014
Our ref: 110894
Your ref: -



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Dear Mr Reep

**North Somerset Core Strategy: Revised Policy CS13: January 2014
Sustainability Appraisal Supplementary Report and Habitat Regulations Assessment update**

Thank you for your consultations on the above dated 27 January 2014 and 18 February 2014 respectively, which were received by Natural England on the same dates.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

General

We understand that the Core Strategy is a strategic, not a detailed document and that more detailed Development Plan Documents (DPDs) are being produced that will be subject to strategic environmental assessments including, where relevant, Habitat Regulations Assessment. For example, we are aware that the Council is currently preparing its sites allocations and development management policies plan, and would expect a more detailed assessment of potential impacts on the natural environment will be possible for this 'lower tier' document.

Green infrastructure

We are also aware that the Council is in the process of preparing a Green Infrastructure Strategy for the district and would expect this to make an important contribution to the protection and enhancement of designated sites and landscapes, as well as providing a range of other social, economic and environmental benefits. Careful consideration should be given to the mitigation role of GI, as has been envisaged for it in the Core Strategy SA/SEA and HRA, as the GI strategy is being developed. We would welcome an opportunity to comment on this document in due course.

Sustainability Appraisal, incorporating Strategic Environmental Assessment

We have taken the above into account as part of our consideration of the Sustainability Appraisal Supplementary Report and are largely content that it presents a reasonably detailed and systematic assessment of the proposed changes to Policy CS13 (and the subsequent revisions to policies CS14, CS28, CS30 and CS31) in terms of the policy's consistency with the principles of sustainable development, including social and economic as well as likely environmental effects. Furthermore, we are broadly satisfied that the Supplementary Report meets the requirements of the (SEA)

Directive and that its findings appear reasonable.

Further information needed

However we are concerned about an apparent contradiction between what is being said in section 5 of the SA/SEA and the actual wording of the proposed Policy CS13.

Section 5.2 of the SA states that “*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 appears to suggest the change to Policy CS13 would remove the word minimum, thereby limiting the amount of new housing to 17,130. However the proposed policy wording set as out in Appendix A continues to refer to *delivery of a minimum of 17,130* as follows:

CS13: Scale of new housing

A supply of deliverable and developable land will be identified to secure the delivery of a minimum of ~~14,000~~ 17,130 dwellings within North Somerset 2006–2026.

With this in mind, we would be grateful for further information and clarification of this point. While we are generally satisfied that the assessment has been sufficient to judge the effects of 17,130 houses we would wish to discuss whether there is a need for further assessment of a greater number that may result from a policy that is open ended and could be seen to support a greater number of new dwellings.

Habitats Regulations Assessment

We have also considered the Habitats Regulation Assessment (HRA) update and welcome the Council’s efforts to prepare this in response to our previous comments on the proposed changes to the Core Strategy (Ref 105843, dated 17 January 2014).

In our view the HRA update provides an adequate assessment of the likely effects of the proposed policy changes on European Sites, both within and beyond the Plan area, at this strategic level and we can confirm that the conclusion of the HRA that implementation of the Plan changes is not likely to result in significant effect on European protected sites appears reasonable.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Amanda Grundy on 0300 060 1454. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Amanda Grundy
Lead Adviser, Sustainable Development network