



**North Somerset Council Core Strategy Consequential Changes
Examination**

Matter 1: Sustainability Appraisal

(Tuesday 21st June 2016)

Statement on Behalf of Hallam Land Management

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Question 1): Are the sustainability appraisals that have been previously carried out sufficient to demonstrate the consequential changes to the policies continue to represent the most appropriate policy direction and spatial strategy?

1. Hallam Land Management (HLM) is of the view that a satisfactory sustainability appraisal (SA) process has been undertaken to demonstrate that the consequential changes to the policies continue to reflect the most appropriate policy direction and spatial strategy to accommodate growth.
2. Whilst it is acknowledged that the Council have not undertaken a SA process exclusively to re-appraise the consequential changes to the policies subject of this examination, the remaining remitted policies (CS6, CS14, CS19, CS28, CS30, CS31, CS32 and CS33) were included in the original 2011 SA to the Core Strategy. That original SA tested a number of housing delivery options ranging from 6,711 - 26,750 dwellings, a range within which the now adopted housing requirement of 20,985 sits.
3. A further four options were then tested in a supplementary SA (January 2014) to support the revised Policy CS13. The Inspector's report to the re-examination of Policy CS13 (**CC/04**) stated that an adequate range of options has been assessed and was considered sound (para. 28).
4. Having regard to the Inspector's conclusions on the SA process in relation to the re-examination of Policy CS13, HLM considers that given the proposed spatial hierarchy, that seeks to prioritise growth at the most sustainable settlement categories, giving primacy to Weston Super Mare; and the three main towns; the service villages; and following that infill villages and countryside, remains consistent with that appraised at various stages throughout the plan making process and that no new "reasonable alternatives" have been identified that would require a re-consideration of the spatial strategy, it is entirely reasonable to conclude that any such iteration of the SA process would be unlikely to result in a difference outcome to that reported in 2011.
5. The additional impacts of higher levels of development are largely site specific in nature and are readily addressed through the process of identifying appropriate sites. Indeed, additional SA work has been carried out to support the emerging Site Allocations Plan (Consultation Draft, March 2016), which identifies sites that would contribute to meeting the increased housing requirement. The draft Plan has itself been subject to an SA

process that has appraised sites individually. The Council have also undertaken an overarching re-appraisal of the relative sustainability of settlements which concluded that the existing service village designations and strategy for accommodating growth at villages and rural settlement remains an appropriate strategy through which to direct growth across the district.

6. HLM made representations to the Draft Site Allocations Plan (representations dated 28 April 2016), confirming its support to the Council's approach, specifically in the context of assessing and identifying Yatton as one of the most important of a range of sustainable settlements capable of accommodating growth required to meet the pressing market and housing needs of the District. Moreover it is necessary to accommodate significant development in the service villages (including Yatton) to meet housing needs but also to provide a range of opportunities to support delivery rates.

7. Furthermore, and notwithstanding our argument as set out in the hearing statement for Matter 2, (that the Council's supply figures appear to be overstated, figures that are fundamental to the effectiveness of policy CS14 – Distribution of Housing), it is considered that the spatial strategy as proposed by North Somerset Council, provides the basis for accommodating increased growth, a strategy that is supported by the Sustainability Appraisal, including in its assessment of cumulative effects, and demonstrates an approach where economic growth and housing development can be planned comprehensively to promote a sustainable form of development advocated by the National Planning Policy Framework and where substantial infrastructure investment is planned.