

**EXAMINATION INTO THE SOUNDNESS OF THE NORTH SOMERSET CORE STRATEGY: CONSEQUENTIAL CHANGES TO POLICIES CS6, CS14, CS19, CS28, CS30, CS31, CS32 AND CS33**

**STATEMENT ON MATTER 1: SUSTAINABILITY APPRAISAL**

The following Statement has been prepared on behalf of our client, Mead Realisations Ltd, in relation to the consequential changes to Policies CS6, CS14, CS19, CS28, CS30, CS31, CS32 and CS33 (the Remitted Policies). Mead Realisations Ltd has submitted representations at earlier stages of the process and participated in the previous examination process for remitted Policy CS13 in relation to its land interests at Parklands (within the Weston Villages), elsewhere in North Somerset and generally as an active property developer in the area.

**Inspector's Question 1.**

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

**Introduction**

- 1.1 On pages 15 and 16 of the 'Response to Inspector's Letter of 24 February 2016' North Somerset Council (the LPA) argue that a Sustainability Appraisal (SA) of the proposed changes to the remitted policies is not required as amendments do not amount to a changed spatial strategy and SA was undertaken in respect of both the Core Strategy and the re-examination of Policy CS13. Furthermore, the LPA state that an updated SA is not required as no new reasonable alternatives to their proposed strategy have been identified. The LPA's position is unjustified for the following reasons:

- The proposed changes to the remitted policies clearly amount to a changed spatial strategy.
- The SA process to date did not assess any spatial strategy scenarios in respect of a housing requirement of 20,985 dwellings.
- The LPA has not demonstrated that there are no new reasonable alternatives to their proposed strategy.

1.2 Each of these matters is addressed in turn below.

**The proposed changes to the remitted policies clearly amount to a changed spatial strategy**

1.3 The settlement hierarchy for North Somerset as set out in the Core Strategy is:

- Weston-super-Mare
- Clevedon, Nailsea and Portishead
- Service Villages
- Infill Villages

1.4 In our view it is not possible to increase a housing requirement in a Core Strategy by almost 7,000 dwellings without altering the spatial strategy. However, in order for the Council to at least try and claim that it is possible it is reasonable to assume that they would need to spread the increased housing requirement proportionately amongst the various tiers (which itself would not be an evidence based approach). However, as set out in the table below the Council has not spread the increased housing requirement proportionately amongst the various tiers. For example, the dwelling requirement for the 'Weston Villages' is proposed to increase by 18%, while

the dwelling requirement for the ‘Other Settlements and Countryside’ is proposed to increase by 128%.

Area	Current Requirement (2012 Remitted Policy)		Proposed Requirement (2015 Consultation)		Percentage Increase in Dwellings
	Dwellings	% of Total Requirement	Dwellings	% of Total Requirement	
Weston Urban Area (excluding Weston Villages)	3,458	24.7%	6,459	30.8%	87%
Weston Villages	5,500	39.3%	6,500	30.9%	18%
Clevedon, Nailsea and Portishead	3,715	26.5%	4,976	23.7%	34%
Service Villages	805	5.8%	1,861	8.9%	31%
Other Settlements and Countryside	522	3.7%	1,189	5.7%	128%
<b>Total:</b>	<b>14,000</b>	<b>100%</b>	<b>20,985</b>	<b>100%</b>	

- 1.5 On the basis of the above it is clear that the spatial strategy for the area has changed.

**The SA process to date did not assess any spatial strategy scenarios in respect of a housing requirement of 20,985 dwellings**

- 1.6 On page 15 of the ‘Response to Inspector’s Letter of 24 February 2016’ the LPA set out the Sustainability Appraisal (SA) process to date. This comprises a list of four SA documents, the most recent of which was published in January 2014 (RED-09) to support the LPA’s consultation on their proposed amendments to Policy CS13 (Scale of New Housing). At that time the LPA was proposing to increase the overall housing requirement from 14,000 dwellings to 17,130 dwellings.

1.7 The January 2014 SA included an assessment of the following range of overall housing requirements:

- Option A - 14,000 dwellings
- Option B - 17,130 dwellings
- Option C - 19,395 dwellings
- Option D - 20,220 dwellings

1.8 In this respect it is important to note that for the two highest options (C and D), both of which are below the actual housing requirement of 20,985 dwellings, the SA did not assess how the housing would be distributed. This is confirmed at paragraph 6.3 of the January 2014 SA which states:

*"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). 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."*

1.9 On the basis of the above the LPA cannot claim that the SA process to date has assessed their proposed spatial distribution of the increased housing requirement, let alone any reasonable alternatives.

**The LPA has not demonstrated that there are no reasonable alternatives to their proposed strategy**

1.10 As set out above the LPA's claim that their proposed spatial distribution of the increased housing requirement has been subject to SA is incorrect. On this basis the LPA need to undertake an SA of the proposed changes to the remitted policies before they can be found sound.

- 1.11 In this respect paragraph 016 (Reference ID: 12-016-20140306) of the National Planning Practice Guidance (NPPG) is key as it sets out the role of Sustainability Appraisal in the plan making process. It states:

*“Every Local Plan must be informed and accompanied by a Sustainability Appraisal. This allows the potential environmental, economic and social impacts of the proposals to be systematically taken into account, and should play a key role throughout the plan-making process. The Sustainability Appraisal plays an important part in demonstrating that the Local Plan reflects sustainability objectives and has considered reasonable alternatives. The Sustainability Appraisal should incorporate a Strategic Environmental Assessment to meet the statutory requirement for certain plans and programmes to be subject to a process of ‘environmental assessment’.”* (Our emphasis)

- 1.12 In the ‘Response to Inspector’s Letter of 24 February 2016’ the Council acknowledge that they have not assessed any alternative scenarios. It states:

*“There is no clear consensus from the development industry as to what an alternative spatial strategy might be, given the context imposed by the remitted policies process.”* (Paragraph 12)

*“In particular, no new ‘reasonable alternatives’ have been identified, i.e. other strategic options that could make a significant difference at this stage to the emerging distribution of housing growth over the plan period.”* (Paragraph 63)

- 1.13 As set out above the Council’s stance is that no alternatives have been considered as they have not been suggested by the development industry. This is not an appropriate position for the LPA to take as it is their role to demonstrate that alternative scenarios were considered.