

**North Somerset Council**

**Hearing Statement April 2017**

**Reference: CS/1**

**Matter 1 - Sustainability Appraisal**

**1.1 Is the SAP based on a sound process of sustainability assessment (SA) and testing of reasonable alternatives, in a proportionate manner (Doc SD7)?**

1. Paragraph 009 of the Planning Practice Guidance sets out the level of detail required within a Sustainability Appraisal (SA) . It says that the SA should only focus on what is needed to assess the likely significant effects of the Local Plan (in this case this is the Site Allocations Plan). It also says that it should focus on the environmental, economic and social impacts that are likely to be significant and that it does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the Local Plan.
2. We have complied with the above requirement through the production of the SA Scoping report and SA Main report with accompanying Residential site assessment (SD6, SD7 and SD8).

**Reasonable Alternatives**

3. Regulation 12 of the regulations that transpose the SEA Directive relates ‘reasonable alternatives’ to ‘*the objectives and the geographical scope of the plan*’. As is outlined in paragraph 3.1 of the SA Main Report (SD7), the SAP is subordinate to the Core Strategy and as such the objectives of the Plan flow from those in the Core Strategy, and therefore it is not considered necessary to reappraise them. Paragraph 2.8 of the SAP outlines those Core Strategy objectives that influence the Plan.
4. Paragraph 018 of Planning Practice Guidance relating to SEA and SA, defines reasonable alternatives as ‘*the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.*’ We are content that the realistic alternatives have been adequately assessed for the main allocations within the Site Allocations Plan.
5. The Sustainability Appraisal Scoping report (SD6) says at paragraph 7.3 that the SA would be carried out on the basis of assessing the difference made by

having, as opposed to not having the spatial policies in their proposed form. This is achieved through assessment against various SA objectives with opportunities to improve the spatial options to meet those objectives identified. SD7 explains how for each allocation type we have selected a method of assessment to test the compatibility with the appropriate SA objectives. More detail is outlined below.

### **Residential site allocations**

6. The test of reasonable alternatives is done through the residential site assessment process. This process allows us to look at all possible reasonable residential sites and test these against the relevant sustainability objectives.
7. The preferred options have been identified through internal assessment processes conducted by planning officers. As outlined in para 4.4 of the Site Allocations Plan, the residential site allocations were initially assessed through the Housing & Economic Land Availability Assessment (HELAA) to determine whether they had potential for development by being broadly in accordance with national and local policies and considered to be suitable and also deliverable. Those sites identified as having potential for residential development were assessed, not only in terms of their sustainability credentials, but also in terms of their suitability, availability and achievability. Sites were discounted when in conflict with key constraints of Green Belt, Flood Zone 3b or within the Area of Outstanding Natural Beauty (AONB). Those sites which met the test set out above were identified as the preferred options.
8. Those sites identified as the preferred options were assessed alongside all other reasonable alternative sites, which were all other sites put forward by developers, landowners and other interested parties. This is outlined as Option B in para 4.6 of SD7, where we could have allocated all sites put forward through the call for sites (excluding those within the Green Belt or Flood Zone 3b).
9. The results of this assessment are seen at document SD8. By doing this the council has tested the preferred option sites against all other reasonable alternative options capable of meeting spatial planning objectives of the Local Plan (Core Strategy) to meet the housing requirement.
10. Brief details for the reasons for allocating sites or otherwise are included in SD8. To comply with the SA requirements, where there were issues of conflict with SA objectives, these were highlighted and measures to reduce or mitigate impacts are detailed in Schedule 1 of the Sites Allocation Plan (SD1) under the site specific details/notes column.
11. A third option of not allocating any sites to accompany the Sites and Policies Part 1 plan was identified as Option C – a ‘no plan’ option. This was also considered to be less favourable than the preferred option as the likelihood of

less sustainable sites coming forward through speculative planning applications was far greater given no allocations. There is also no guarantee that enough sites will come forward via this route.

12. It was therefore not considered necessary to conduct any further SA assessment than that provided through SD8. All sites were scrutinised against the relevant SA objectives, which amounted to 22 separate sub-objectives covering 4 of the 5 main SA objective themes.

### **Employment site allocations**

13. As described within the SA main report (SD7), the preferred option was to allocate employment sites identified through technical assessment through the Site Allocations process. Realistic alternatives were identified as a) retaining those allocations for employment sites identified through the Replacement Local Plan and b) the 'no plan' option, which would be to not allocate employment sites. The alternative options were tested against relevant sustainability appraisal objectives and the result of this is displayed in Appendix 2 (page 25 SD7) of the report. The results show that the preferred option meets the objectives with a positive impact on most occasions with no major adjustments required.

### **Local green space allocations**

14. As described within the SA main report (SD7), the preferred option was to allocate local green spaces identified through technical assessment through the Site Allocations process. Realistic alternatives were identified as a) retaining those allocations for Amenity Areas only identified through the Replacement Local Plan and b) the 'no plan' option, which would be to not allocate local green spaces. The alternative options were tested against relevant SA objectives and the result of this is displayed in Appendix 3 (page 28 SD7) of the report. The results show that the preferred option meets the objectives with a positive impact on most occasions with no major adjustments required.
15. Para XI of the non-technical summary of SD7 states that the main findings of the SA is that the proposed Site Allocations Plan allocations meet the SA Framework objectives more often than the reasonable alternatives. This is largely due to the fact that the technical assessment procedure carried out when selecting preferred allocations embedded sustainability criteria into the process. For this reason, it is not proposed that any of the site allocations require any alteration, as adverse sustainability implications are likely to be minimised through the adoption of the SAP.