

North Somerset Council

Hearing Statement April 2017

Reference: CS/3

Matter 1 - Sustainability Appraisal

1.3 How does the assessment of the sustainability of service and infill villages relate to the process of assessing the sustainability of potential residential site allocations as set out in SD7?

- I. **The site allocation West of Engine Lane, Nailsea has a number of red and amber ratings compared with other sites which are not allocated. Why has this site been chosen instead of other sites with a lower number of amber and red ratings?**
 1. The Introduction to Reviewing the sustainability and settlement hierarchy of settlements in North Somerset (SD9, page 3) sets out that assessing sustainability is a two stage process. *'The first stage identifies the relative current sustainability of service and infill villages across the district. This is the purpose of this report. The second stage is a detailed assessment which looks at individual sites and how development of these sites could impact on the current and future sustainability of a settlement.'* Document SD9 therefore provides information to inform the first stage of an assessment process and document SD7 is therefore part of the second stage of the process.
 2. The purpose of SD9 is to provide an overall impression of relative sustainability of rural settlements to aid decision making. It is important to remember that other factors will be taken into account when decisions are made on site allocations. There is no expectation that the RAG ratings given to individual settlements should be slavishly followed through to decision making. In practice, different sustainability criteria assessed within an overall assessment are likely to have different weightings applied. For example the 'well served' category (access to services and facilities) in practice is likely to have more weighting than how 'well-run' a community is judged to be.
 3. SD9 is clear in saying that sources other than the assessment report will determine detailed allocations *'other technical studies will determine the appropriate amount and location of new development and to ensure that it is adequately supported by necessary infrastructure and services.'* Page 4 (para 3).
 4. There're are clear links between the two assessment processes, the detail contained in report SD9 informs the allocations identified in SD1. Some of the

evidence gathered to inform SD9 was used to inform the residential site assessments (SD8). Examples of this will include distances from town centre services and facilities (information from SD10), information on Best and Most Versatile (BMV) agricultural land quality, information on flood zones, distances to rail stations and sustainable travel opportunities within settlements and individual sites.

Engine Lane, Nailsea

5. The residential site assessment (SD8) which accompanies the SA main report (SD7) shows that each site is given a RAG rating against a range of sustainability appraisal objectives.
6. This provides the Sustainability Appraisal for the residential site allocations and provides an indication whether the preferred options perform better in terms of matching sustainability objectives compared to the reasonable alternatives, which are all the other sites assessed within SD8.
7. The RAG approach provides a way of identifying those sites which have potential conflicts with meeting sustainability objectives. It is important to note that the other factors influencing the overall planning balance will come into play in the determination of preferred sites. There may be other factors relating to individual sites which take precedence over the RAG ratings for a site. For example in the case of Engine Lane, Nailsea Town Council has promoted the site to deliver a particular mix of housing identified by the local community.
8. Paragraph 4.20 of SA main report (SD7) acknowledges that RAG ratings may not always be directly related to the preferred sites selected. It states that '*the assessment is a guide to the most appropriate residential allocations, rather than a definitive assessment.*' We recognise that those sites selected as preferred options will not always meet all SA objectives and sub-objectives. It should be noted the site at the West of Engine Lane does meet the majority of SA objectives with a green rating. It is also recognised that some of the RAG rating indicators allow for a large degree of variation between those given the same RAG rating. Two sites on the face of it may appear comparable in terms of the RAG ratings received, but in reality they could be very different in terms of meeting SA objectives. For example, sites which score amber for adverse impact on landscape setting can vary significantly between those which have a small adverse impact to those which have a much greater adverse impact. The RAG ratings are a crude measure in this regard. It is therefore identified that some of the SA objectives are perhaps difficult to define via the RAG system.
9. Paragraphs 4.14 to 4.17 of SD7 acknowledge that other considerations will come into play when selecting preferred sites for allocation. This will include whether the site is developable, whether it complies with policy or whether there are physical limitations. There could be other barriers to delivery which

may include legal or ownership problems. It is therefore not always possible to select those sites which match the sustainability objectives better than any individual alternative site.

10. It is recognised that because of the quantum of housing required, sites with less favourable sustainability scores would need to be considered. This is explained within paragraph 4.20 of SD7 where in an ideal world, sites with red scores would be removed from the pool of possible allocation sites, as the red scores highlight concerns over the possibility of sustainable development of the site. For example, it is acknowledged that the site West of Engine Lane is a greenfield site and therefore scores red under this sub objective. However, the revised housing target in the Core Strategy means that greenfield sites will be required to provide a range and choice of locations.
11. The identification of red RAG ratings are useful in highlighting possible issues and flagging up that these areas will need further investigation, including of mitigation opportunities. In most cases, the potential for negative impacts will be flagged up within Schedule 1 of SD1. Areas for concern are most likely to be addressed through EIA or other technical assessments if subsequent planning applications are submitted.