

NORTH SOMERSET SITE ALLOCATIONS PLAN EXAMINATION

MATTER 1

SUSTAINABILITY APPRAISAL

POSITION STATEMENT

ON BEHALF OF

MACTAGGART AND MICKEL HOMES LTD



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RA Ref: MACT0002

LPA Ref: -

Office Address: Number One
Queen Square Place
Bath
BA1 2LL

Telephone: +44 (0)1225 433675

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1. Introduction

1.1 This Position Statement sets out a brief response on behalf of Mactaggart and Mickel Homes (MM) to the Inspector's questions in relation to Matter 1.

1.2 It should be read in conjunction with the MM's submissions to:

- North Somerset Site Allocations Plan Consultation Draft (April 2016) (MM1)
- North Somerset Site Allocations Plan Publication Version (December 2016) (MM2)
- Position Statements relating to other matters identified by the Inspector for consideration at the Examination.

2. Issue 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)?

- 2.1 For reasons that are substantiated in response to Issues 1.3-1.5 below, the SAP is not considered to be based on a sound process of SA.
- 2.2 The purpose of the SAP is set out in the Introduction to the Plan, and is “... *to identify the allocations required to **deliver** the North Somerset Core Strategy, consistent with government guidance*” (SD1, para. 1.3, emphasis added). Some of the key NPPF requirements that are relevant to the SAP are identified, the emphasis of which is on ‘delivering’ necessary development (SD1, Section 2, Policy Context, para. 2.3). The key Core Strategy objectives that significantly influence the content of the SAP are also identified, again with an emphasis on ‘delivering’ development and growth (SD1, Section 2, Policy Context, para. 2.8).
- 2.3 Since the overarching objective of the SAP is to ensure the ‘delivery’ of the requirements for development and growth, it is a weakness of the SA, and in particular the Residential Site Assessments (SD8), that ‘deliverability’ of sites is not included in the high level objectives against which individual sites are to be tested. This is particularly so since the SA report itself expressly acknowledges the PPG guidance relating to the assessment of the deliverability of sites for housing development (SD7, para. 4.14).
- 2.4 Whilst the SA report indicates that barriers to delivery have been taken into account, this has not been undertaken in a transparent manner, and it is accepted that they “... *do not contribute to the site scoring, but are useful aspects to inform any consideration of site deliverability and/or longer term potential*” (SD7, para. 4.16).
- 2.5 Since the overarching objective of the SAP is to ‘deliver’ the strategic requirements for development and growth, it is a significant weakness of the SA that such considerations do not contribute to the scoring of individual sites. As will be clear from Section 1.3 below, assessment of sites against ‘deliverability’ considerations could impact fundamentally on the selection of sites for allocation at Nailsea.

- 2.6 Since 'deliverability' is fundamental to development being sustainable, the failure to carry out such assessment in a transparent manner, and for it to contribute to the scoring of individual sites, is considered to be a significant omission from, and weakness of, the SA framework.
- 2.7 As is also outlined in Sections 1.4 and 1.5 below, the site selection process has postponed flood risk assessment, including application of the sequential/exception tests, to the application stage. However, the SA has failed to consider an alternative portfolio of sites that excludes those within areas at risk of flooding, notwithstanding that there is no certainty that the assessments will demonstrate acceptable risk and satisfaction of the sequential/exception tests. This is considered to be a significant omission which also has implications for the deliverability of the development provisions of the Plan to meet strategic requirements.

3. Issue 1.2

Is there any correlation between the position of a settlement in the sustainability hierarchy (SD9) and the quantity of development allocated to that settlement?

- i Why does Backwell as the most sustainable village have an allocation of 65 dws, whereas Yatton as the 3rd most sustainable have an allocation of 676 dws, and Churchill in 6th place in the hierarchy have an allocation of 219 dwellings?*
- ii Long Ashton is in second place in the hierarchy but has no allocated housing sites. Can this be explained?*
- iii Bleadon is identified as having few job opportunities – is this correct, and if not was it considered for a higher level of housing allocations?*

3.1 This question relates essentially to the hierarchy of rural settlements, and the apportionment of the Core Strategy requirements for growth between them based on that hierarch. No representations were originally made by MM in relation to these matters, and therefore no submissions are made in this Position Statement.

4. Issue 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?

- 4.1 In their original representations MM made no comment on the sustainability assessment of service and infill villages. Therefore, no response is made to the preliminary question raised by the Inspector. However, in MM2 they made submissions on how the Sustainability Appraisal (SA) of sites at Nailsea did not support the allocations that are proposed in the Plan.
- 4.2 The Inspector has correctly acknowledged that the Engine Lane site performs worse than other sites that are not allocated in the Plan, and questions why it has been chosen ahead of other sites. It is MM's view that the sustainability appraisal of the Engine Lane site is lacking in robustness and it actually performs worse than indicated in the SA. In particular, in terms of Objective 5.4, the site is further from the Railway Station than land north of Youngwood Lane. Moreover, the latter site has potential accessibility to the Station via an existing footpath running south-east towards Backwell. Given that land north of Youngwood Lane also scores more favourably in terms of proximity to bus stops, it has better accessibility to the Station by public transport. It is therefore considered that accessibility of the Engine Lane site to the Station should be a red rating since it is inferior to the Youngwood Lane site.
- 4.3 In response to the Inspector's question, MM have commissioned their own appraisal of the transport related sustainability credentials of their site north of Youngwood Lane compared with the Council's Proposed Allocation West of Engine Lane. A copy of the Sustainability Appraisal is appended ([*Appendix 1_Sustainability Appraisal_Land North of Youngwood Lane, Nailsea*](#)). The comparative assessment involves a GIS-based accessibility model that incorporates all available non-car travel infrastructure set against available local amenities.

- 4.4 The results of MM's analysis clearly demonstrate that the Youngwood Lane site has superior proximity to a greater number of amenities, and by a larger number of travel modes, than the proposed allocation west of Engine Lane. Having applied a score to each viable journey that reflects the combined attractiveness of the mode of travel with frequency of visits undertaken to that type of amenity, the results confirm the superior sustainability credentials of the Youngwood Lane site, with a score that is some 7.2% higher than the proposed allocation West of Engine Lane.
- 4.5 The overall conclusion is therefore that land north of Youngwood Lane has greater propensity to reduce car travel, and in consequence vehicle emissions, increase productive time in the economy, and improve health. As such, the land north of Youngwood Lane is more positively aligned with the environmental and social dimensions to sustainable development as set out in the NPPF.
- 4.6 The SA also fails to support the allocation of other sites ahead of the Youngwood Lane site. In particular, the allocated site at North-West Nailsea ranks below the omission site on grounds of flood risk. Apart from the unallocated site to the south of Nailsea, it is the only site that gives rise to any issues of flood risk. The evidence from the Environment Agency's Flood Map for Planning indicates that it could fall within Flood Zone 3.
- 4.7 There is no evidence that the site at North West Nailsea has been subject to Flood Risk Assessment, including Sequential and Exception tests. Given that there are other sites that otherwise score similarly in the SA that are in Flood Zone 1, it seems unlikely that the site would pass the Sequential Test. Should the findings of the Flood Risk Assessment be that the site falls within Flood Zone 3b, then the site ought properly to have been excluded at the initial stage (SD7, para. 4.8).
- 4.8 In relation to the other criteria set out in the SA, the allocated site at North-West Nailsea only performs better than the site at Youngwood Lane on the basis of proximity to a public leisure centre. However, this is a new objective that was only included in the SA between the Consultation and Publication draft Plans. This means that, at the time the North-West Nailsea site was allocated, it performed worse in terms of the SA than other sites, and in particular the site at Youngwood Lane with which it is otherwise identically rated apart from flood risk.

- 4.9 In terms of a fundamental sustainability criterion, which is grounded in planning policies at all levels, the allocated site at North West Nailsea performs less well than the site at Youngwood Lane. It has not been subject to Flood Risk Assessment, including Sequential and Exception tests, and it seems unlikely that it would pass the sequential test given that there are other available sites that the SA indicates to be more suitable.
- 4.10 It is also unclear why the site at North West Nailsea ranks similarly to the site at Youngwood Lane in terms of Objective 5.4. Given its greater distance from the Railway Station, and absence of direct footpath link, it performs worse in terms of this SA objective.
- 4.11 The reason given in the Residential Site Assessments for rejecting the site at Youngwood Lane are that it is too distant from the town centre and would intrude into open countryside. However, the site performs identically to the allocated site at North West Nailsea in terms of Objectives 5.1 to 5.3, and outperforms the allocated site at Engine Lane in terms of these criteria. Moreover, it is ranked identically to the sites at Engine Lane and North West Nailsea in terms of Objective 5.5.
- 4.12 Notwithstanding, and without prejudice, to the foregoing, as is correctly acknowledged in the SA, the NPPF requires judgements to be made in the plan making context as to whether a site can be considered deliverable, developable or not currently developable for housing development. This necessitates consideration of, *inter alia*, barriers to delivery, including factors such as legal or ownership problems, multiple ownerships, ransom strips, tenancies or operational requirements of landowners which would remove the realistic prospect of the site coming forward:

Other constraints whilst important considerations, may not necessarily rule a site out, but the cumulative impact of them alongside other constraints might. These do not contribute to the site scoring, but are useful aspects to inform any consideration of site deliverability and/or longer term potential. (SD7, para. 4.15).

- 4.13 For reasons set out in response to Issue 1.1 above it is considered that the SA is flawed since it fails to include deliverability as an objective against which to test site options. In consequence, it is unclear how the important considerations outlined above have informed the process and influenced the selection of site allocation. The process is not transparent, and would not appear to have been robustly discharged.

- 4.14 The allocation at North West Nailsea corroborates the evidence of a lack of transparency in assessing the deliverability of site options. It has been potentially available for development since the 1990s when it was first allocated in the Clevedon, Nailsea and Portishead Local Plan 1992. Since that time the site was again allocated for residential development in the North Somerset Local Plan 2000, and was subject to applications for outline planning permission in 1993 and 2002. The planning history therefore indicates that there are deliverability constraints affecting the site.
- 4.15 In addition to the issues of flood risk outlined above, the site is also constrained by the pylons and high voltage overhead power cables that traverse it. There are also understood to be land ownership constraints. Whilst the overhead power cables may be moved as part of the infrastructure works associated with the proposed nuclear power station at Hinckley Point, there is no definite timescale for their relocation. Even if they are relocated in time for the site to deliver its capacity during the plan period, there is no certainty of resolution of either ownership or flooding constraints.
- 4.16 Given that the Plan period is now more than half its term expired, the lack of housing delivery at Nailsea for a period now exceeding 15 years and which is reflected in the population age imbalance¹, and the fact that the site at North West Nailsea accounts for approximately half of the planned capacity for the town, the risks of allocating a site of uncertain deliverability are too great.
- 4.17 The absence of a housing delivery objective from the SA has therefore enabled the continued reliance on the site at North West Nailsea to deliver a major share of the Core Strategy requirement for the town. Inclusion of such an objective would clearly confirm the inferiority of the site compared with other potential options, and in particular the site at Youngwood Lane.
- 4.18 For all of the foregoing reasons it is concluded that the site allocations at Nailsea pursuant to the strategic housing requirement for the town are not justified by the SA. In particular, the two largest allocations (at Engine Lane and North West Nailsea) that account for approximately 80% of the allocated capacity at the town, perform less well in the SA than other sites that were rejected, and in particular the site at Youngwood Lane. If a housing

¹ See MM2, paras. 3.12-3.12 and Schedule 3.1



delivery objective is properly included in the SA, then the justification for the allocated sites diminishes further.



5. Issue 1.4

To what extent has the development proposed to be allocated in the Plan been assessed for its overall impact on drainage and flooding?

- i As the allocated sites are developed, can access to the rhyne network be guaranteed for the North Somerset Internal Drainage Board?***
- ii The Environment Agency requires contributions for managing flood risk on Uphill, Cross Rhyne and Banwell catchments. Are these viable and deliverable, and how will they be secured?***

5.1 The extent of the assessment of the development proposed to be allocated in the Plan for its overall impact on drainage and flooding is only very limited.

5.2 As cited in MM1 and MM2, no fewer than 20 of the sites contained in Schedule 1 are allocated subject to a flood risk assessment and sequential/exception tests accompanying future planning applications. The sites in question are intended to make an aggregated contribution of 1,391 dwellings based on the capacities identified in the Schedule. Given that detailed risk assessments have yet to be undertaken there can be no certainty that the flood risks will be found to be acceptable and the sequential/exception tests passed.

5.3 Moreover, some other sites for which the requirement for flood risk assessment is not identified in Schedule 1 are known to be at risk from flooding. An example is the proposed allocation at North West Nailsea (with a capacity of 450 dwellings). As is evident from MM's response to Issue 1.3 above, there are suitable and available sites at Nailsea in Flood Zone 1, and which are therefore sequentially preferable to the North West Nailsea allocation.

5.4 The guidance in the NPPF is clear that:

Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:

- *applying the sequential test;*
- *if necessary, applying the exception test ... (para. 100)*

... Development should not be allocated or permitted if there are reasonably available sites in areas with a lower probability of flooding ... (para. 101)

- 5.5 The evidence base accompanying the Submitted Plan does not include a Flood Risk Assessment or a report of the application of the sequential and exception tests. Given that this is a requirement for plan-making, the inclusion of sites subject to such assessment being undertaken at the planning application stage would seem to be contrary to the NPPF and therefore a soundness issue. It creates uncertainty regarding the deliverability of the allocated capacity given that there can be no surety that the flood risks are acceptable and/or the sequential/exception tests will be satisfied. To include them would pre-empt proper and robust application of these tests.

6. Issue 1.5

Does the Plan provide sufficient safeguards for those sites which have been identified as likely to have or to contribute to flood or drainage issues?

- 6.1 Given the response to Issue 1.4, and that flood risk assessments have yet to be undertaken for a substantial number of sites that are allocated in the Plan, sufficient safeguards have not been provided for those likely to have flood or drainage issues.
- 6.2 Having regard to paragraph 102 of the NPPF, it is the responsibility of site-specific flood risk assessments to demonstrate that there are sufficient safeguards for those sites that give rise to flood risk issues. Since such assessments, including application of the sequential and exception tests, have yet to be undertaken for allocated sites within flood risk zones, it cannot be demonstrated that sufficient safeguards have been provided. The NPPF is clear that both elements of the test will have to be passed for development to be allocated or permitted. Since the tests have yet to be applied it cannot be demonstrated that they have been passed, and therefore that their allocation is NPPF-compliant.



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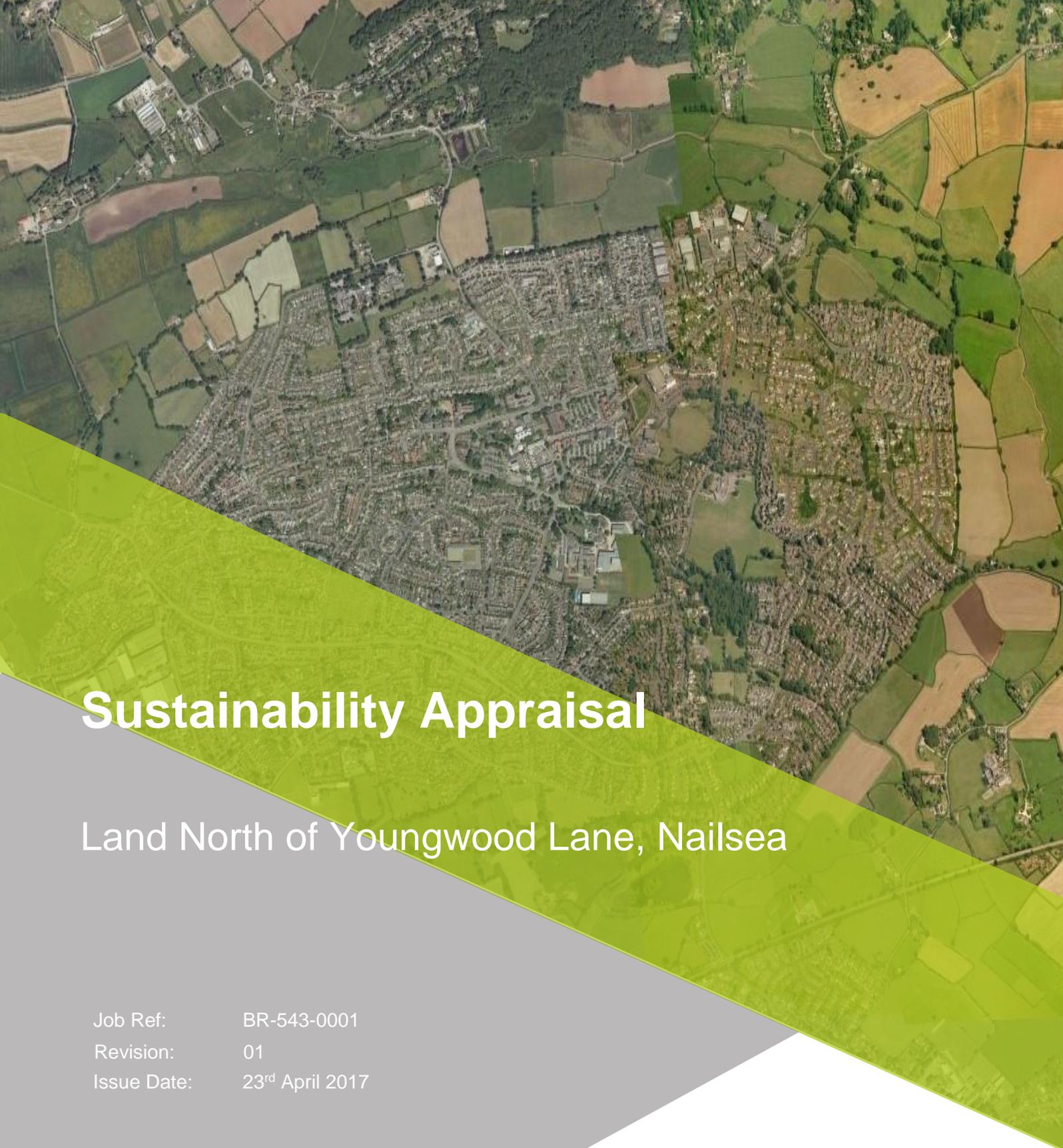




APPENDIX 1

**SUSTAINABILITY APPRAISAL
LAND NORTH OF YOUNGWOOD LANE,
NAILSEA**





Sustainability Appraisal

Land North of Youngwood Lane, Nailsea

Job Ref: BR-543-0001
Revision: 01
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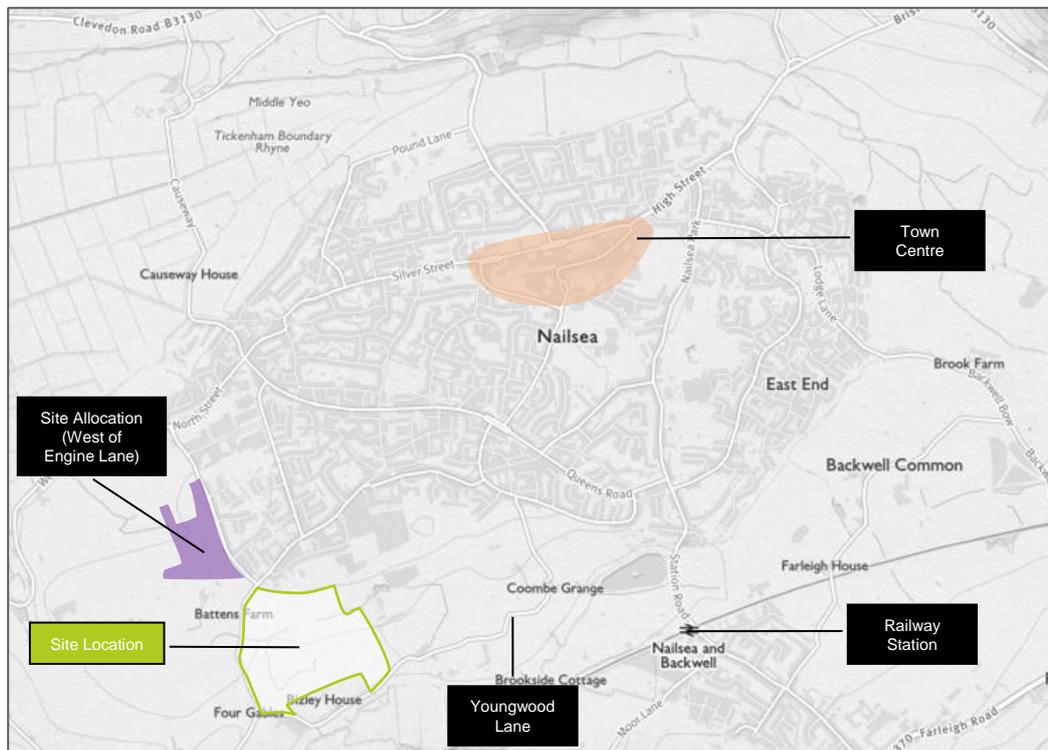
1. Introduction

1.1 Background

1.1.1 Calibro has been appointed by Mactaggart & Mickel Homes to provide an appraisal of the transport related sustainability credentials of their site at Youngwood Lane, Nailsea (herein referred to as “the site”) in support of its on-going promotion for residential development via the North Somerset Allocations Plan Examination.

1.1.2 The site is shown below for context.

Figure 1-1 Site Location



1.1.3 The sustainability appraisal focuses on the performance of the site relative to the nearby site allocation known as West of Engine Lane (identified above in Figure 1-1), and has been commissioned with the purpose of providing a more thorough analysis than has been undertaken by Council and their more rudimentary Sustainability Appraisal (SA).

1.1.4 Indeed, the Council’s SA takes a relatively blunt and unsophisticated approach in their analyses, comparing a limited number of parameters and presenting the results for each site using a simple traffic-light system based on defined bands.

- 1.1.5 Whilst the Council's approach has its placed in providing an 'early indication' of a site's likely performance, it does not by any means represent a rigorous assessment.
- 1.1.6 The Local Plan Inspector has also queried the use of the Council's SA in determining draft allocation sites and Issue 1.3 (copied below) queries why some site allocations have been included over other sites that have a greater number of favourable ratings within the Council's SA.

“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.”*

- 1.1.7 The purpose of this appraisal is therefore to provide the Inspector with a reliable evidence base of the relative performance of the site and the site allocation at West of Engine Lane.

1.2 Structure of the Report

- 1.2.1 The report sets out the various considerations under the following structure:

Section 2.0: Strategic Accessibility Model

This section of the report provides a concise critique of the Council's SA and identifies an appropriate methodology that responds to the various omissions. The results of the mode are also discussed.

Section 3.0: Report Summary & Conclusion

A summary of the findings of the report is provided within this section of the report together with an overriding conclusion.

2. Strategic Accessibility Model

2.1 Review of the Council's Sustainability Appraisal

- 2.1.1 The Council has undertaken its own Sustainability Appraisal to support the Local Plan allocations process. It adopts a three-tier performance threshold which corresponds with a 'traffic light' system of bandings. In this way, each measure of sustainability considered by their SA is summarised against a good, average or bad score (as indicated by a green, amber or red colour banding, respectively).
- 2.1.2 The SA applies this approach in respect of a relatively limited number of measures (see below) which include broad categories of local amenities, including "health facilities", primary and secondary education facilities, employment and proximity to the nearest bus stop. However, the analysis attaches equal importance to each amenity and thereby ignores the fact that the potential to access to some amenities by non-car modes could have a greater (positive) impact on the environment than others.
- 2.1.3 Indeed, whilst all of the specified amenities (and some not included in the analysis) have a contribution to the social dimension of sustainability, as defined under the terms of the NPPF, the visitation rates to some amenities is significantly less than others. For example, it is common for people to travel to and from work five out of seven days each week, whereas visits to post offices and libraries are undertaken on a less frequent and more ad-hoc basis.
- 2.1.4 The Council's SA also makes no attempt to reflect the number of jobs that may be accessed by each site.
- 2.1.5 Consequently, a site that affords the greatest opportunity to access those most frequently visited amenities by non-car travel modes, have the greatest potential reduce car use and thereby offer the greatest potential to use natural resources prudently, minimise pollution and support a movement towards a low carbon economy, in line with Paragraph 7 of the NPPF.
- 2.1.6 Thus, whilst the Council's approach provides a concise evaluation which may be useful in certain circumstances, it ignores the true complexity of the accessibility question and by extension is therefore unable to determine with any confidence whether a site under consideration is more sustainable than any other.

2.2 Updated Sustainability Appraisal

Methodology

- 2.2.1 To address the deficiencies in the Council’s SA, an updated Sustainability Appraisal has been undertaken which focuses on the relative performance of the site relative to the site allocation at West of Engine Lane, Nailsea. Notwithstanding the technical limitations of the Council’s assessment, the need for an updated and more thorough analysis is further justified by the scale of the potential development at West of Engine Lane combined with the extent of local opposition that has been voiced towards that proposal.
- 2.2.2 The analysis has been informed by use of a GIS-based accessibility model which was constructed to include all available non-car travel infrastructure within and around the settlement of Nailsea. This therefore incorporated roads with contiguous footways, footpaths or ‘quiet roads’ where it was considered informal walking within the carriageway could be undertaken without detriment to highway safety. In the context of the site, it was assumed that infrastructure would be required to connect to the existing infrastructure network but no further allowance has been made.
- 2.2.3 The model also incorporated the most up-to-date public bus timetable information for the area and was supplemented by geo-referenced amenity data for the following types of local services.

Table 2-1 Modelled Amenities

Community	Education	Foodstores	Health & Wellbeing	Employment
Post Office	Primary Schools	Supermarket	Hospitals	Jobs*
Library	Secondary Schools	Convenience Store	Doctor’s Surgeries	
	Further Education		Dental Practices	
			Pharmacies	
			Sports & Leisure	

**employment centres modelled by reference to Work Place Zones using population weighted centroids from ONS data.*

- 2.2.4 The accessible catchments for non-car travel modes between the sites and above amenities have been modelled from data points set at 50-metre intervals within the boundary of each site, with the most favourable journey (i.e. shortest distance / time) being adopted for the purpose of the assessment. This avoids the need to make assumptions regarding future on-site infrastructure.

2.2.5 A journey between the site and an amenity was assumed to be viable if it satisfied the following conditions:-

- A maximum walk threshold of 2-kilometres for all trips other than food shopping, in line with guidance provided within the IHT’s document entitled ‘Planning for Journeys on Foot’;
- A maximum cycle threshold of 5-kilometres was adopted for all trip types, in line with industry-standard assumptions; and
- A maximum bus journey of 38-minutes was adopted for all journey purposes, which reflects the average bus journey as given by the Department for Transport in its document entitled Transport Statistics Great Britain 2015, for journeys in the South West of England.

2.2.6 The opportunities afforded by rail access were excluded from the analysis on the basis that both sites would utilise the same rail services to access jobs, shops and services. Consequently, its inclusion would have no bearing on the results of the analysis. However, the opportunities and distances involved in the journey to the rail station have been considered within the above using the above catchment limitations.

2.2.7 The optimum journey time / distance is shown for each site and each amenity in the below table.

Table 2-2 Optimum Journey Distance / Time – Youngwood Lane (The Site)

Category	Amenity	Mode of Travel		
		Walk	Cycle	Bus
Community	Post Office	-	8	12
	Library	25	8	11
Education	Primary Schools	7	3	6
	Secondary Schools	22	7	10
	Further Education	-	-	31
Foodstores	Supermarket	13	4	7
	Convenience Store	10	3	8
Health & Wellbeing	Hospitals	-	-	34
	Doctor’s Surgeries	-	8	12
	Dental Practices	25	8	11
	Pharmacies	-	8	12
	Sports & Leisure	6	4	6
Rail	Nailsea & Backwell Station	-	9	19
Employment	Jobs	2,595	6,036	9,473

Table 2-3 Optimum Journey Distance / Time – West of Engine Lane

Category	Amenity	Mode of Travel		
		Walk	Cycle	Bus
Community	Post Office	-	9	12
	Library	-	9	11
Education	Primary Schools	11	4	7
	Secondary Schools	25	8	11
	Further Education	-	-	32
Foodstores	Supermarket	9	3	8
	Convenience Store	11	3	9
Health & Wellbeing	Hospitals	-	-	35
	Doctor's Surgeries	-	9	12
	Dental Practices	-	9	12
	Pharmacies	-	-	12
	Sports & Leisure	11	4	10
Rail	Nailsea & Backwell Station	-	11	19
Employment	Jobs	2,595	6,036	8,735

2.2.1 Comparison of the Table 2-2 and Table 2-3 enables a simply comparison to be undertaken as to which site is more proximate to each of the modelled amenities, and this is shown in the below Table 2-4.

Table 2-4 Journey Comparison

Category	Amenity	Is Youngwood Lane Better?		
		Walk	Cycle	Bus
Community	Post Office	SAME	BETTER	SAME
	Library	BETTER	BETTER	SAME
Education	Primary Schools	BETTER	BETTER	BETTER
	Secondary Schools	BETTER	BETTER	BETTER
	Further Education	SAME	SAME	BETTER
Foodstores	Supermarket	WORSE	WORSE	BETTER
	Convenience Store	BETTER	SAME	SAME
Health & Wellbeing	Hospitals	SAME	SAME	BETTER
	Doctor's Surgeries	SAME	BETTER	SAME
	Dental Practices	BETTER	BETTER	BETTER
	Pharmacies	BETTER	BETTER	SAME
	Sports & Leisure	BETTER	SAME	BETTER
Rail	Nailsea & Backwell Station	SAME	BETTER	SAME
Employment	Jobs	SAME	SAME	BETTER

2.2.1 It is evident from the above that the site is more proximate to more amenities than the site allocation at West of Engine Lane. Indeed, the site allocation at West of Engine Lane performs better than the site in respect just two measures, these being access to supermarkets by walk and cycle. However, the site performs better than the site allocation at West of Engine Lane on 23 measures but is identical in respect of 17 measures.

2.2.2 An interim conclusion would therefore indicate that the site is more sustainable (in the context of the social dimension of sustainability) than the site allocation at West of Engine Lane. Nonetheless, this would ignore the relative attraction value of each amenity and the subsequent environmental savings that might be accrued by reducing car use and the associated emissions.

Scoring Process

2.2.3 To overcome some of the criticisms of the Council's SA, a scoring system has been developed which takes accounts of the relative attraction value of each amenity and of the non-car travel mode by which it is accessible. This reflects the fact that, whilst a site may be accessible by bus or cycle, an alternative site that is accessible by foot should be favoured due to the fact it can be undertaken by anyone, without the need for special equipment, can be undertaken as an unplanned journey, offers personal health benefits and does not result in vehicle emissions.

2.2.4 The scores are calculated on the basis of the below:-

- i. The Department for Transport's National Travel Survey: England 2015¹ (as the most up-to-date release) has been used to identify the proportion of all trips associated with each type of amenity. For example, all amenities fall within a community use, shopping or commuting.
- ii. The National Travel Survey (NTS) has also been used to identify the mode share of trips undertaken in respect of each type of amenity.
- iii. The number of jobs that lie within the accessible catchment areas, weighed in accordance with the mode shares for commuting trips (as 'ii' above).

2.2.5 The resultant scores are shown in the below Table 2-5.

¹ NTS0409 Table – Average Number of Trips (Trip Rates) By Purpose and Main Mode - 2015

Table 2-5 Scoring Methodology

Category	%age of Trips	Mode Share			
		Walk	Bicycle	Bus	Rail
Commuting	19.50%	36.20%	13.90%	28.10%	21.80%
Leisure	19.50%	59%	9.70%	22.30%	9%
Personal Business	23.20%	68.50%	4.10%	23.70%	3.70%
Shopping	23.20%	66.50%	3.60%	27.70%	2.20%
Education	14.60%	74.60%	2.90%	20%	2.40%
Total	100.00%	-	-	-	-

2.2.6 Combination of the above yields factors by which to reconcile the attraction of the amenity type and the mode by which you may travel there. The resultant scores are shown in the below Table 2-6.

Table 2-6 Resultant Score Factors

Category	Mode Share			
	Walk	Bicycle	Bus	Rail
Commuting	7.1	2.7	5.5	4.2
Leisure	11.5	1.9	4.4	1.8
Personal Business	7.9	0.5	2.7	0.4
Shopping	15.4	0.8	6.4	0.5
Education	10.9	0.4	2.9	0.4

2.3 Model Results

2.3.1 Application of the above scores shown at Table 2-6 above provides a rounded view of the relative accessibility of each the sites considered within the model. The results are shown in the below Table 2-7.

Table 2-7 Updated Sustainability Appraisal - Model Results

Category	Considered Site	
	Youngwood Lane	West of Engine Lane
Community	18	18
Education	37	34
Foodstores	58	58
Health & Wellbeing	51	43
Employment	4	3
Access to Rail	11	11
Total	179	167

2.4 Section Conclusion

- 2.4.1 It is evident from the analysis undertaken that the site (Youngwood Lane) performs better than the site allocation at West of Engine Lane. Indeed, the relative difference amounts to some 7.2% and is therefore considered to be material in the context of concluding which of the sites would more closely contribute to the environmental and economic dimension of sustainability, as set out under the NPPF.
- 2.4.2 Thus, the Local Plan Inspector was right to seek clarification in Issue 1.3 as to why the site allocation at West of Engine Lane has been selected over other sites which have been proven, by both this assessment and by the more rudimentary assessment undertaken by the Council, to be more compliant with current policy.
- 2.4.3 Indeed, evidence supports an alternative conclusion that the site (Youngwood Lane) should be allocated above West of Engine Lane.

3. Report Summary & Conclusion

3.1 Report Summary

3.1.1 Calibro has been appointed by Mactaggart & Mickel Homes to provide an appraisal of the transport related sustainability credentials of their site at Youngwood Lane, Nailsea in support of its on-going promotion for residential development via the North Somerset Allocations Plan Examination.

3.1.2 The findings of the report may be summarised as follows:-

- i. The Council has undertaken its own Sustainability Appraisal to support the Local Plan allocations process. It adopts a three-tier performance threshold which corresponds with a 'traffic light' system of bandings. However, this is considered to be too simplistic and failed to reflect the relative attraction of different types of amenities.
- ii. The Local Plan Inspector also sought clarity on the way in which the Council's SA had been applied in the selection of allocation sites and the purpose of this report is to provide further evidence in support of their review.
- iii. An updated Sustainability Appraisal was undertaken on the basis of a GIS-based accessibility model that was constructed to incorporate all available non-car travel infrastructure set against available local amenities. This was used to identify the journey distances / time between each site and the respective amenity from data points set at 50-metre intervals within the sites. The most favourable measurement was selected for the appraisal.
- iv. Stated maximum journey distances informed by industry-standard data were used to identify viable journeys. Where journeys exceed the maximum allowable travel time, they were considered to be inaccessible to that amenity.
- v. The results at this stage were compared for each site with the results clearly demonstrating the Youngwood Lane site was more proximate to a larger number of amenities, by a larger number of travel modes, than the site allocation at West of Engine Lane. It is therefore concluded that the Youngwood Lane site is more aligned with the social dimension of sustainability, as set out under the NPPF.

- vi. A score was applied to each viable journey that reflected the combined attractiveness of the mode of travel and the frequency of visits undertaken to that type of amenity.
- vii. The results indicate that the Youngwood Lane site would perform better than the site allocation at West of Engine Lane, with a score some 7.2% higher. This indicating that the Youngwood Lane site would offer greater potential to reduce reliance on car travel and thereby reduce potential vehicle emissions, increase productive time in the economy and improve health. The Youngwood Lane site would therefore be more closely aligned with the environment and economy dimensions of sustainability, as set out in the NPPF.

3.2 Report Conclusion

- 3.2.1 On the basis of the evidence presented within this Sustainability Appraisal, it is evident that the site allocation at West of Engine Lane is sub-optimal in the context of an alternative site that is available for development at Youngwood Lane, Nailsea.
- 3.2.2 The Local Plan Inspector was therefore justified to seek clarity on the proposed selection of sites and the evidence suggests that the Youngwood Lane site should be allocated for residential development.



hello@calibro-consultants.com
www.calibro-consultants.com

