

Sustainability Appraisal Consultation comments



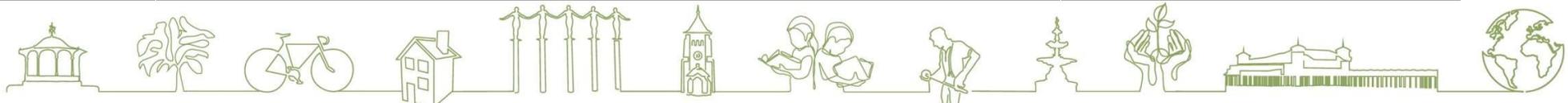
Comments from statutory consultees:

Respondent	Comment	Officer response
Environment Agency	<p>1. Have all relevant plans, programmes and policies been referenced?</p> <p>We support inclusion of UKCP18 which is due to be updated in 2020, this update needs to be included within the emerging SFRA Level 1 as proposed.</p>	<p>Noted. This will be included in the new SFRA when finalised.</p>
Environment Agency	<p>2. Is any significant economic, social or environmental data missing or misrepresented?</p> <p>The Environmental Baseline text should make reference to the Water Framework Directive, the directive should be followed when developing along watercourses.</p> <p>Biodiversity and landscape character area protection – Page 45</p> <p>The reference to Local Biodiversity Action plans has now largely been superseded by Action for priority species under NERC 2006.</p>	<p>The baseline references local and national documents only. It is assumed that international documents are translated into National and Local policy.</p> <p>Noted and table 11, page 45 now references NERC 2006.</p>

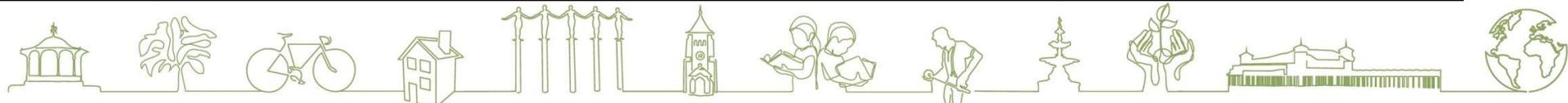
	<p>Although the North Somerset LBAP appears to still be a relevant supplementary planning document, it is now 15 years old and will need to be updated with guidance on Biodiversity Net Gain, the Governments 25-year Plan and the new Environment Bill 2020.</p> <p>Invasive non-native species should be included as an existing biodiversity problem, with the promotion of good and effective biosecurity practices.</p> <p>The promotion of and adopting of Natural Flood Management methods are encouraged for reasons of improved biodiversity and reduction in flood risk.</p> <p>Water Quality:</p> <p>The Environment Agency supports sustainable development, in particular the encouragement of resource efficiency, specific emphasis should be placed on the issue of waste minimisation and recycling.</p> <p>The specific inclusion of text highlighting the need to protect ground and surface waters is welcomed, in terms of both quality and quantity, it is considered essential to convey a greater appreciation of the overall environmental setting.</p> <p>The water quality theme should, as detailed above, include ground and surface waters, in terms of both quality and quantity.</p> <p>Wastewater infrastructure should include phosphate stripping.</p>	<p>NSC will publish a Green Infrastructure strategy this year which will reflect these plans.</p> <p>Added detail on non-native species in table 11, page 45.</p> <p>Added detail in para 3.68 regarding natural flood management methods.</p> <p>Added paragraph 3.34 to reflect this about resource efficiency.</p> <p>Noted</p>
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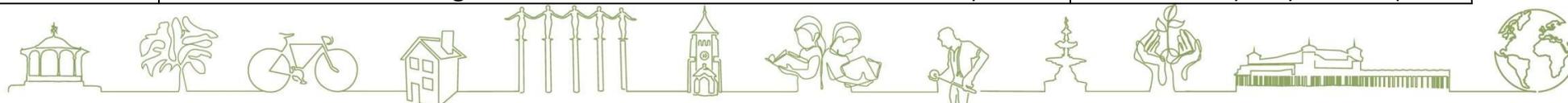
	<p>The theme of 'making efficient use of land' should include reference to PPS23 as a source document.</p> <p>Flood Risk:</p> <p>A Strategic Flood Risk Assessment Level 1 is currently being updated to include climate change which is supported.</p> <p>Green Infrastructure:</p> <p>The inclusion of aspirations for greening river corridor for biodiversity improvements are welcomed, set back of development would create recreation and access for maintenance benefits. Any lighting should be set back and suitably designed with wildlife in mind.</p> <p>Rewilding:</p> <p>Tree planting for rewilding is encouraged and supported for biodiversity, giving improvements for wildlife and climate change.</p> <p>When planting alongside watercourses access for maintenance must be considered.</p> <p>Net Gain:</p> <p>We support and encourage the principle of Net Gain which is established within the SA, to make contributions for environmental gains either on or off-site. This aspiration is detailed in the National Planning Policy Framework and is further supported by the 25 Year Environment Plan. This sets an expectation for development,</p>	<p>PPS23 replaced by NPPF</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>New Green Infrastructure strategy will reflect this.</p>
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	<p>including housing and infrastructure, by all organisations and individuals, that will help deliver net gain. The Agency would expect guidance to be given for calculation of levels and look forward to future policy detailing how you will embed the environmental net gain principles.</p>	<p>Added detail to objective 3.6 to greater reflect biodiversity net gain.</p>
<p>Natural England</p>	<p>1. Have all relevant plans, programmes and policies been referenced?</p> <p>Having reviewed the Pre-commencement and SA Scoping documents we welcome the acknowledgement of the opportunity to step back and reassess the strategic context and spatial strategy options. That reassessment should be supported by the best available evidence and will benefit from the evidence gathered through the JSP process and other ongoing local initiatives. In particular we would highlight the following:</p> <ul style="list-style-type: none"> • Evidence from the SA and HRA for the JSP, particularly that which identified need for a strategic solutions to protect key nature conservation interests in North Somerset, including rare bats and habitats sensitive to recreational pressures. • Evidence presented in the Joint Green Infrastructure Strategy that illustrates how key priorities for nature, health, climate and can be delivered through an integrated approach to protection and provision of GI, prioritising key strategic projects. • Evidence from environmental assessment of recent major development applications in North Somerset, including Bristol 	<p>Discussed comments with Natural England on 26th May 2020</p> <p>A reference to evidence of the JSP SA and HRA will be included. However, this will be considered where there is general evidence that will remain relevant, but not specific mitigations in relation to specific sites.</p> <p>Updated BAT data is on the way.</p> <p>The N Somerset GI strategy is in progress and consultants</p>



	<p>Airport, and large housing developments such as those around Nailsea, Weston, Clevedon and Banwell.</p> <p>In addition, the reassessment also allows more meaningful consideration of other local and national priorities, including climate and ecological emergencies, and work to take forward the Government's 25YEP, including a nature recovery network and biodiversity net gain. New legislation and duties will come into being during the preparation of the Local Plan.</p> <p>A spatial strategy should take account of all major constraints, issues and opportunities. The evidence described above will be key to this, and we welcome the intention to look at again at the Green Belt, which we believe can have an enhanced role in delivering goals of the Plan and sustainable development.</p>	<p>have been passed these comments, it will:</p> <ul style="list-style-type: none"> • follow guidelines set out within the West of England GI plan • Pay due regard to the new duties emerging from the Environment Bill and Defra's 25- year Environment Plan • Take account of the Climate Emergency Strategy and Action Plan
<p>Natural England</p>	<p>2. Is any significant economic, social or environmental data missing or misrepresented?</p> <p>The baseline for tourism identifies a number of key attractions; many of these locations are within or close to protected sites and landscapes, which as noted above, are under increasing pressure from the effects of recreation. This illustrates the need for an integrated cross sectoral approach.</p> <p>We note the reference to the condition of SSSIs within North Somerset, which suggests 77.2% are in favourable condition. We are concerned that this figure is based on out of date information for many SSSIs and masks the reality of the current condition of these sites. Local Natural England SSSI lead advisers confirm that many of</p>	<p>Discussed comments with Natural England on 26th May 2020</p> <p>Noted</p> <p>SSSI condition – acknowledged that most haven't been updated for 10 years, as obtaining data is difficult. Agreed that as there isn't currently any more up-to-</p>



SSSIs are under increasing pressure from development related issues, which include poor water quality due to run-off, inappropriate or lack of management (absence of grazing animals and scrub encroachment), often due to high recreational pressure, as well as a range of urban fringe effects such as increased lighting, noise, fly tipping, cat predation, dog fouling, vandalism etc. Many of these SSSIs are noted as being key tourist attractions and their ongoing protection and management (particularly those sites where grazing is a key part of favourable site condition) is important for the tourism sector as well as for their intrinsic ecological, landscape and/or geological interest.

We are pleased the importance of water quality is recognised, as this is a widespread issue in North Somerset; however we are concerned the baseline references to the Severn Estuary River Basin Management Plan and to the North Somerset Levels and Moors Catchment Project might imply the identified issues are in hand, while we understand the funding and implementation of mitigation measures is still largely to be determined.

We are also pleased the significant environmental, social and economic benefits of green infrastructure is recognised and that the West of England Joint Green Infrastructure Strategy is referenced. The emerging JGIS provides a framework for bringing together a range of evidence and priorities, including the nature recovery network, so that the spatial strategy for development can be more integrated and local projects can be developed where they will have most benefit. Implementation of the WoE GI strategy will need to be supported by suitable policies in the new local plan.

date available, Natural England can feed through updates as they become available. May be able to provide case by case narrative for potential site locations.

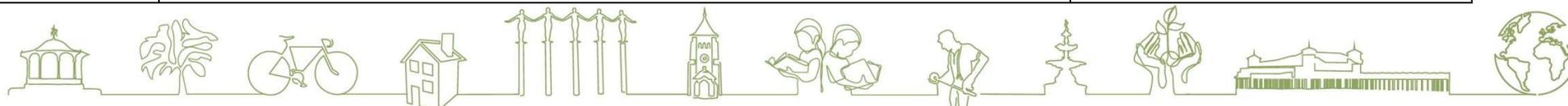
Reference to the Bristol Avon Catchment Project added which provides information on catchment level interventions.

Water quality – It is noted that there are issues from surface water run-off, and new development could add to the problem. New local plan policy will be written to address this.

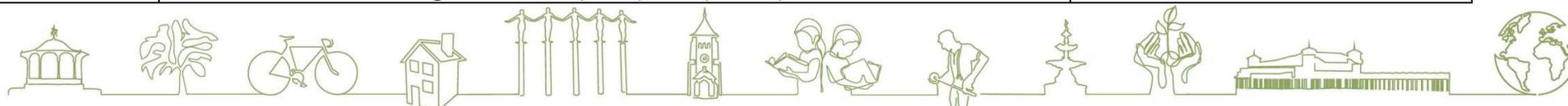
Noted that there is support is available from government for tree planting – and will ensure the right trees are planted in the right places.



	<p>We would welcome the opportunity to continue to work with North Somerset council and other authorities to coordinate the approach to strategic issues and identify best practice across the subregion. It will also be necessary to consider the need to work strategically with neighbouring Somerset authorities to identify shared issues, for example in relation to the Severn Estuary and Mendip Limestone Grasslands EU sites, and the Mendip Hills AONB. The Environment Bill and 25-year plan are clear that protection and enhancement of nature needs to go beyond existing designated sites to secure more, bigger and better-connected habitats that will be needed to halt the loss of biodiversity and deliver a range of other ecosystem benefits to society.</p>	<p>The Rewilding strategy will reference the Tree and Woodland strategy, being developed by the West of England Nature Partnership.</p> <p>We are committed to fulfil the Duty to cooperate role by working with neighbouring authorities.</p>
<p>Natural England</p>	<p>3. Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan document?</p> <p>We welcome the Council's recognition of the current climate emergency and the objective to reduce GHG to mitigate climate change. However, objectives relating to climate change adaptation are also needed in recognition that some changes are inevitable and suitable measures will be needed to reduce the adverse effects of this on people and the natural environment. We would expect the new local plan to have an important role in setting out how its spatial strategy will support climate change adaption and mitigation, ideally identifying where natural solutions to managing threats and risks may be more cost-effective than hard engineering projects.</p>	<p>Having reviewed other SAs, it is considered that climate change adaptation is covered within objectives relating to flooding, water supply, biodiversity and green infrastructure provision. Added wording in objective 3.6 - Protect and where possible enhance Biodiversity, Geodiversity and green infrastructure <u>and allow its adaptation to climate change.</u></p>



	<p>We note the references to the Duty to Cooperate and commitment to working with neighbouring authorities and others to address strategic issues. The progression of the West of England GI strategy provides a way of meeting this duty in relation to the natural environment. A joined-up approach to the natural environment will be equally important with Somerset authorities. Sedgemoor District shares cross boundary European and nationally protected sites and landscapes with North Somerset district - recognising recreational pressures are already impacting on these areas and are likely to increase as a result of the new local plan.</p>	<p>We are committed to fulfil the Duty to cooperate and the new GI strategy will flow from the WoE strategy. New WoE tree strategy is being developed. This will be high-level doc with appropriate areas identified – including space for more urban trees.</p>
<p>Natural England</p>	<p>4. Do you agree with the proposed Sustainability Appraisal Framework?</p> <p>We have a number of concerns with the Sustainability Appraisal Framework as presented. It is essential that SA objectives and assessment criteria are robust and address the right issues and requirements. The proposed SA objectives and decision-making criteria as set out in tables 12 to 14 are not always easy to understand, with a number of apparent omissions and a lack of coherence in some parts – we have highlighted some examples below but would welcome further discussion with the Council.</p> <p>Table 12 - We recognise the urgent need to reduce carbon and other GHG emissions and are supportive of objective 3.1 Support decentralised renewable energy generation; renewable energy schemes can have negative impacts, including on landscape and ecological interests, and we would encourage the Council to consider undertaking a sensitivity/capacity study to ensure the most</p>	<p>Discussed comments with Natural England on 26th May 2020</p> <p>We have added wording to objective 3.1 to reflect this.</p> <p>A West of England study is due to be commissioned (July) which will address</p>



	<p>appropriate renewable technologies are directed to the most suitable locations.</p> <p>As previously mentioned, we would encourage the Council to include an objective for climate change adaptation and an objective to protect natural resources, including soil, air and water.</p> <p>We also suggest 'where possible' is deleted from objective 3.6 in recognition that the Environment Bill is most likely to be have become law by 2023, the beginning of the plan period, and it is expected that all new development will be required to provide a 'net gain' for biodiversity - if such gains are not possible to achieve on site, an off-site contribution will be required. We would encourage the council to consider developing more detailed guidance on 'BNG' in the form of a SPD.</p> <p>Table 13 - We note that 'development at coastal locations' is considered to be a positive effect of the plan in relation to objective 2.5 improve health and wellbeing; this may be the case but the rationale for this statement is not clear and we would welcome further explanation, particularly as the North Somerset coastline lies adjacent to the Severn Estuary European site. The landscape/townscape objective 3.4 is broadly welcome, although the criteria should recognise that impacts on Mendip Hills AONB can arise from development outside, but in the setting of the AONB, depending on its characteristics and special qualities. Objective 3.6 protect and where possible enhance biodiversity and Green Infrastructure is welcome in principle, subject to deletion of 'where possible'; however, to be meaningful the suggested scoring criteria and indicators will require a robust baseline and understanding of</p>	<p>landscape sensitivity with respect to renewable energy.</p> <p>Response detailed above</p> <p>Have retained 'where possible', but added that where not possible onsite, then offsite contributions to biodiversity enhancement will be required.</p> <p>Coastal locations - The key settlements in North Somerset are in coastal locations. However, depending on the development, it could score poorly against Objective 3.6 which aims at protecting important sites.</p> <p>Have amended objective 3.6: <i>Protect and where possible enhance Biodiversity,</i></p>
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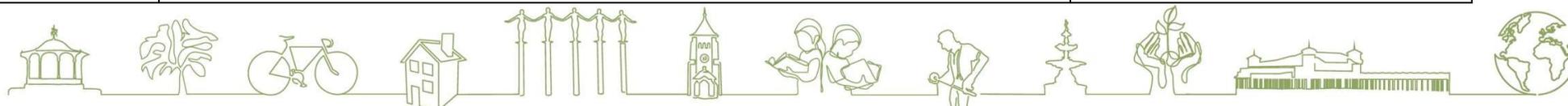
	<p>ecological assets. A great deal of evidence has been gathered to inform the WoE GI strategy and other plans and projects; the Council has also commissioned bat surveys in relation to the Bats SAC. This information should provide a reasonably sound basis for the new local plan.</p> <p>It will also be necessary to develop a mechanism for calculating and securing biodiversity net gain from development, ideally linked to locally agreed GI priorities, such as protecting and reinforcing local nature recovery networks and providing new recreational opportunities to alleviate recreational and other pressures on sensitive habitats. It will be essential that a robust and consistent approach to the requirements and standards expected for site-based habitat surveys and analysis is set out clearly in the new local plan.</p> <p>Table 14 - Compatibility of SA objectives appears to have identified only one negative effect, relating to meeting housing needs and water quality – we recognise there is an existing issue with poor water quality in the district arising from development, including at Nailsea and underneath J19 of the M5, however this seems unlikely to be the only example of conflicting objectives, when considering the range of adverse effects new development can have on the natural environment.</p>	<p><i>Geodiversity and Green Infrastructure and allow its adaptation to climate change. Particularly with respect to protected habitats and species. Where this is not possible onsite, an offsite contribution to biodiversity enhancement will be required.</i></p> <p>New Green Infrastructure Strategy 2020 will address this.</p> <p>Have reviewed the table and some limited changes have been made.</p>
Natural England	<p>5. Is the proposed methodology for the next stages of the Sustainability Appraisal correct?</p>	



	<p>Subject to some changes to the SA Framework objectives and targets, the methodology itself appears reasonable and to follow standard practice.</p> <p>Monitoring:</p> <p>We note the monitoring questions:</p> <ul style="list-style-type: none"> • <i>Were the assessment's predictions of sustainability effects accurate?</i> • <i>Is the plan contributing to the achievement of desired SA objectives and targets?</i> • <i>Are mitigation measures performing as well as expected?</i> • <i>Are there any adverse effects? Are these within acceptable limits, or is remedial action desirable?</i> <p>Monitoring is an essential element of the local plan process – the above questions are reasonable, but again are dependent on having set appropriate objectives and targets and identifying suitable and measurable indicators of success or otherwise. We expect the broad objectives and targets will need to become more specific as plan options are refined - for example to measure the progress of green infrastructure and/or strategic mitigation schemes such as may be required to address impacts on designated sites and landscapes.</p>	<p>Monitoring the plan needs to fit into the work on collecting environmental data. Noted that there will be clearer responsibilities coming out of the Environment Bill.</p> <p>Noted</p>
<p>Historic England</p>	<p>1. Have all relevant plans, programmes and policies been referenced?</p>	



	<p>Could we encourage the following?</p> <p>NSC 10-year strategy for heritage, arts and culture.</p> <p>Objectives include supporting quality placemaking, and building the capacity of local heritage, arts & cultural organisations.</p> <p>Great Weston Heritage Action Zone Delivery Plan</p> <p>https://historicengland.org.uk/services-skills/heritage-action-zones/weston-super-mare/</p> <p>https://www.n-somerset.gov.uk/my-business/regeneration/weston-vision/heritage-action-zone/</p>	<p>This will be considered once adopted later in 2020. Reference now included in Appendix 1</p>
Historic England	<p>3. Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan document?</p> <p>Our previous consultation response (NS LP Generating ideas Jan 2018 HE.pdf) highlighted the value of preparing a Heritage Topic Paper setting out the issues, opportunities, risks and challenges facing North Somerset's historic environment as a part of the preparation of a positive strategy (NPPF para 185). Such explicit evidence would demonstrate a rationale for the Sustainability Appraisal in relation to the historic environment.</p>	<p>A heritage topic paper has been produced and will inform the Local Plan</p> <p>Reference added in Appendix 1</p>



	<p>NSC has prepared Conservation Area Appraisals to consider the condition, risks and opportunities faced by the areas significant historic places. Are they useful references to inform the sustainability issues?</p> <p>The adequacy of baseline evidence - The assessment of potential sites across North Somerset will clearly need to be informed by up to date and robust historic environment evidence. Where an initial assessment of the relative impact (positive or negative) on the historic environment/heritage assets and their settings is inconclusive, then further work may be required <u>at this stage</u> to ensure reasonable and informed conclusions can be established as to the likely relative sustainability of emerging proposals.</p> <p>We have sometimes found that the implications for the setting of heritage assets is overlooked or 'parked' to a later application stage. Where this may be appropriate in some situations Planning Policy Guidance (PPG) is clear that where sites are proposed for allocation, sufficient detail should be given to provide clarity about the nature and scale of development (addressing the 'what, where, when and how' questions). To answer such questions, one needs to appreciate the implications of conserving affected heritage assets.</p> <p>To reflect the above the following discrete adjustments to Table 11 are suggested (see table below).</p>	<p>Noted</p> <p>Conservation Officer's Advice will be provided at site assessment stage</p> <p>Adjustments have been made to table 11 to reflect these comments.</p>
Historic England	5. Is the proposed methodology for the next stages of the Sustainability Appraisal correct?	



	To accord with the language and emphasis of national planning policy, could I suggest the following adjustments to the draft framework. (see table below).	Objective 3.5 has been reworded to reflect these comments.
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Table amendments recommended by Historic England:

Key Issue	Objective	Scale of challenge	Likely evolution of the issue without the plan	Potential role of the North Somerset Local Plan
<p>Heritage protection</p> <p>Or</p> <p><u>Protection and enhancement of North Somerset's heritage assets</u></p>	<p>Protection of historical / cultural assets that could be threatened by development and land allocations and by neglect through being unoccupied /underused.</p> <p>Or To conserve the significance of North Somerset's cultural heritage and finite heritage assets and their setting, and ensure their potential contributions</p>	<p>The District has many listed buildings, archaeological sites and conservation areas. <u>Many heritage assets are undesignated.</u></p> <p>There are potential risks associated with significant growth from, for example, strategic infrastructure associated with sizeable development, a discordant scale, massing and height of</p>	<p>Major</p> <p>Continuation or an increase in historic areas, monuments and buildings on the at-risk register. <u>Failure of the Plan to support a realisation of the historic environment's potential to support economic, social and environmental objectives.</u></p>	<p><u>Heritage Assets inc LBs, CAs and Scheduled Ancient Monuments and their settings</u> immediate surroundings can all be <u>sustained</u> protected when determining site allocations, <u>and policy.</u> The Plan can also highlight the importance of regenerating threatened assets and identify potential new uses for them, <u>and inspiring/informing</u></p>

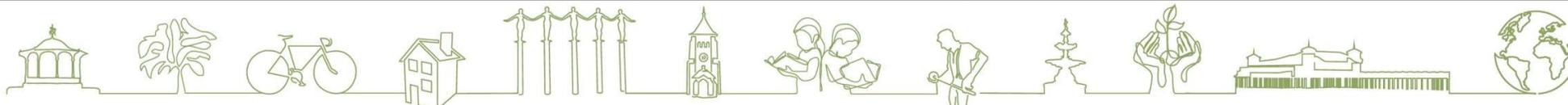


	<p><u>to social, economic, and environmental objectives are realised.</u></p>	<p><u>development in historic centres which can result in: a loss or erosion of landscape/ townscape character; an adverse impact on the historic integrity and setting of historic settlements; a direct and or indirect impact upon individual heritage assets and their settings; traffic congestion, air quality, noise or light pollution and other problems affecting the historic environment.</u></p>	<p><u>distinctive design and place shaping.</u></p> <p><u>Or</u></p> <p><u>Ensure the significance of heritage assets is sustained</u></p> <p><u>Develop a stronger sense of place, and local distinctiveness;</u></p> <p><u>Promote the innovative reuse of the existing building stock for social, cultural and or economic purposes;</u></p> <p><u>Deliver heritage-led regeneration opportunities;</u></p> <p><u>Support the vitality and viability of town centre</u></p>
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				regeneration; Promote heritage based tourism.
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SA Objective	Decision-making criteria (SA will look for...)	Suggested scoring criteria/ Indicator(s)	Relevant SEA topic
Positive effect (+/++)		Negative effect (-/- -)	
Development with access to multiple bus routes.		Development outside cycling network.	
3.5 Minimise impact and where appropriate enhance treasured heritage assets and Conservation <u>To conserve and enhance historic places, heritage assets and their settings</u>	Development that is likely to safeguard, protect, and where appropriate enhance, the significance of any affected heritage asset, historic townscape or landscape.	Development that leads to loss, change or heritage assets. Development in locations which would harm the character and setting of a heritage asset	Heritage advice likely to be needed on the following: [++] enhances heritage assets [+] minor positive effect is likely overall on the heritage asset [0] site has no known heritage assets within boundary– and would



		<p><u>Development likely to harm the significance of an affected heritage assets or its setting.</u></p>	<p>not affect heritage setting.</p> <p>[-] minor negative effect likely overall on <u>minimal harm to the significance of the heritage asset</u></p> <p>[-] detrimental impacts on <u>considerable harm to the significance of a heritage asset</u></p> <p>[?] likely effect on the heritage asset is uncertain</p>	
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Comments from other organisations and individuals

These comments have been extracted from representations made to the North Somerset Local Plan Pre-commencement Document consultation. Only comments that explicitly refer to the Sustainability Appraisal Scoping Report have been copied below; all other general comments will be considered through the pre-commencement consultation response.

Respondent	Comment	Officer response
Bristol Airport	<p>We have reviewed the SA Scoping Report and provided below a response to the five consultation questions set out at paragraph 1.22 of the document.</p> <p>1. Have all relevant plans and programmes been referenced?</p> <p>The review of plans and programmes presented at Appendix 1 to the Scoping Report should include reference to the following additional documents:</p> <ul style="list-style-type: none"> • National: The Aviation Policy Framework (2013), Beyond the Horizon – The Future of UK Aviation: Next Steps Towards an Aviation Strategy (2018); Beyond the Horizon – The Future of UK Aviation: Making Best Use of Existing Runways’ (2018); Aviation 2050: The Future of UK Aviation. • Local: The emerging Bristol Airport Master Plan. <p>Taking into account, and reflecting, the additional plans and programmes outlined above, BAL considers that Section 2 of the Scoping Report should be updated to include specific reference to the need to make provision for the long-term development needs of Bristol Airport, as a catalyst for economic growth.</p>	<p>Noted and it is mentioned in Appendix 1 <i>Review of Plans, Programmes and Policies</i>.</p>



2. Is any significant environmental, social or economic data missing or misrepresented?

BAL considers that the important economic role Bristol Airport plays in North Somerset and the wider region should be recognised in the Economic Baseline (in terms of employment, inward investment, connectivity and GVA) and the Social Baseline (in respect of tourism) sections of the Scoping Report.

We note that the Scoping Report includes reference to Bristol Airport under the Environmental Baseline section. The baseline information in this section should be updated to reflect the most recent data in terms of aircraft movements, employment and public transport mode share. BAL would be happy to provide this information if required.

At paragraph 3.45, the Scoping Report states that "*It is recognised that planned expansion has the potential to impact a range of environmental (and socio-economic) receptors*". BAL considers that the baseline section of the Scoping Report is overly focused on the adverse impacts of the airport's operation and growth and does not recognise the potential for these effects to be mitigated. Further, the Scoping Report does not clearly set out the significant economic benefits associated with airport growth and is, therefore, at present unbalanced.

3. Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan document?

We note that the identified sustainability issues include a single reference to Bristol Airport under the theme 'Pollution'. We consider

Noted. We still have not received updated information, but we are seeking to obtain information at later stage.

Noted. Change in Para 3.46 (p.29) to reflect a more balanced approach to the airport expansion.



	<p>that the sustainability issues should also recognise and include specific reference to Bristol Airport as a key infrastructure asset and strategic employment site and the potential role of the new Local Plan in providing a positive policy framework for the future of the airport. This could be captured under the theme 'Economic prosperity'. The sustainability issues should also recognise the role of Bristol Airport in delivering social (including regeneration) benefits (under the theme 'Inequality') and the need for the Local Plan to promote investment in transport infrastructure including surface access to Bristol Airport, linked to the JLTP.</p> <p>4. Do you agree with the proposed Sustainability Appraisal Framework?</p> <p>BAL notes the proposed SA Framework contained in Table 13 of the Scoping Report. We have the following comments on the SA objectives and associated criteria:</p> <ul style="list-style-type: none"> • SA Objectives 1.1 to 1.3 and the associated scoring criteria focus predominantly on physical accessibility to jobs and we welcome the identification of Bristol Airport as an area of high employment demand (Appendix 2) in this regard. We consider that the SA Framework would benefit from the inclusion of additional criteria related to: the scale of jobs creation/employment land provision; the promotion of inward investment/increasing competitiveness; and tourism. • SA Objective 1.5 seeks to promote development that is unlikely to create excessive infrastructure requirements. We consider that there 	<p>Noted. Bristol Airport's economic and employment role is featured under the theme 'Economic Prosperity'. No regeneration benefits are however identified in this instance.</p> <p>Noted.</p> <p>The addition of another objective is not supported as</p>
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	<p>should be an additional objective that supports investment in strategic infrastructure.</p> <ul style="list-style-type: none"> • SA Objective 3.3 seeks to reduce the need to travel by car with criteria focusing on accessibility. We consider that there should be a further SA objective related to investment in transport infrastructure and increasing connectivity. <p>5. Is the proposed methodology for the next stages of the Sustainability Appraisal correct?</p> <p>BAL does not have any comments on the methodology for the next stage of the SA at this stage.</p>	<p>it will be just for the benefit of the airport.</p> <p>Noted.</p>
<p>Mendip Hills AONB Unit</p>	<p>Question 1. Have all relevant plans and programmes been referenced?</p> <p>The Mendip Hills AONB Partnership produce the AONB Management Plan every five years. The Mendip Hills AONB Management Plan 2019-2024 was adopted by the joint local authorities in Spring 2019. Mendip Hills AONB Unit consider that providing a link to the Management Plan 2019-2024 would be beneficial to cross referencing</p> <p>https://www.mendiphillsaonb.org.uk/caring-about-the-aonb/management-plan/</p> <p><u>Suggested amended text to be</u></p> <p><i>'...The significance of the landscape of the Mendip Hills is acknowledged by their designation as an Area of Outstanding Natural Beauty (AONB) (Map3) for which a Management Plan is produced each five years, the current plan being The Mendip Hills</i></p>	<p>Noted in Paragraph 3.53</p>



	<p>AONB Management Plan 2019-2024 https://www.mendiphillsaonb.org.uk/caring-about-the-aonb/management-plan/ .’</p> <p>2. Is any significant environmental, social or economic data missing or misrepresented? Page 38 Green Infrastructure The Mendip Hills support opportunities to encourage healthy lifestyles – Green Infrastructure opportunities link into the wider strategic GI movement networks within the AONB would be supported, however impact on inherent sensitivities, special qualities and character of the landscapes will need to be carefully considered and addressed.</p> <p>3. Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan document? Mendip Hills AONB Unit wish to highlight considerations regarding forthcoming SHLAA for strategic allocations and transport schemes, highlighting that any considerations must have regards to the purpose of conserving and enhancing natural beauty when discharging any function in relation to, or affecting land within an Area of Outstanding Natural Beauty. Potential development proposals outside of the boundaries of the AONB that may have an impact within the designated area are also covered by the ‘duty of regard’. The wider implications of any transport schemes must be considered, with the cumulative impact on the wider road network. One of the issues impacting the Mendip Hills AONB is that routes across the AONB are frequently used as short cuts by through traffic, affecting both tranquillity and the environment of the nationally protected landscape.</p>	<p>Noted.</p> <p>Such considerations will be taken into account when assessing strategic sites.</p> <p>Noted.</p>
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	A further consideration will be the impact of lighting on the protected landscape.	
Church Commissioners for England	<p>Key Sustainability issues and the North Somerset Local Plan</p> <p>In the Sustainability Appraisal Scoping Report (SASR), Table 11: Current and future Sustainability Issues in North Somerset and the role of the North Somerset Local Plan, 'meeting housing need' is identified as a key issue and the challenge is identified as providing significant housing growth required over the plan period. As set out in the table, planning policy will be used to require an appropriate level of affordable housing and spatial policies will be used to direct development to the most appropriate location.</p> <p>The Site is located within a sustainable location which abuts the settlement boundary within the village of Bleadon. It is protected by heavy screening to the south of the Site and residential units to the north, east and west. The majority of Bleadon's local amenities are located within Bleadon's central and eastern extent, and as such, it is the most sustainable plot in the Village for new residential development. Any future residential development of the Site can be positioned to reflect the layout of the surrounding existing dwellings to ensure that the overall layout and design responds positively to local context and character of the area. Therefore, it is considered that the Site can contribute to meeting local community's needs for housing, including affordable housing, as set out in the SASR.</p> <p>It also noted within Table 11 that 'biodiversity and landscape character area protection' is a key issue and it states that the New Local Plan should ensure that biodiversity and landscape assets are protected and enhanced in new development. The previous development proposals at the Site demonstrate the Church Commissioners commitment to delivering the required ecological</p>	<p>Site-specific assessments will not be considered at this stage of the Sustainable Appraisal.</p> <p>Noted</p>



	<p>mitigation measures to off-set any adverse impacts of development. As noted above, this was also welcomed by the Council in its pre-application response. Therefore, the Church Commissioners consider that development at the Site can contribute to achieving the SASR objective of protecting and enhancing biodiversity, landscape and character.</p>	
<p>Bloor Homes SW Ltd (Land at Banwell)</p>	<p>As this is only a Scoping Report at this stage, we primarily reserve our full comment until the Issues and Options Consultation in Summer 2020 when we envisage that a more complete Sustainability Appraisal will be available for comment.</p> <p>Notwithstanding this, we would request that in preparing the Sustainability Appraisal, the Council revisit the Sustainability Appraisal Framework provided at Table 13 and ensure that this would provide a robust appraisal. For example, with regards to SA Objective 1.5 ('Development which is unlikely to create excessive infrastructure requirements') it is noted that areas where funding for major infrastructure projects is secured will have a positive effect. However, this positive effect is not carried across within the wording for the scoring criteria. Areas that therefore benefit from such infrastructure funding already in place (such as at Banwell) would not benefit within the scoring criteria.</p> <p>We anticipate that the revised Sustainability Appraisal that will be available within the Issues and Options Consultation will be more robust and we will comment in detail at this point on the intricacies of the evidence base.</p>	<p>Whilst the wording of Objective 1.5 is retained, there have been changes to the scoring criteria in order to clarify which type of development should be avoided. That is, development in Low Value Land areas (CIL Zone A) requiring essential major infrastructure or where funding for necessary major infrastructure is uncertain/ areas of low viability unable to secure affordable housing or CIL requirements will score poorly</p> <p>Further consultation will take place along with the Options Document.</p>



<p>L&Q Estates</p>	<p>A review of the supporting Sustainability Appraisal (SA) Scoping Report has been undertaken (Appendix B). Whilst comments on the Scoping Report are formally invited only from three statutory environmental bodies: Environment Agency; Historic England; and Natural England, this review has been undertaken as part of the evidence base to promote Land at Pill Green. The review report also includes a preliminary appraisal of the Land at Pill Green against the sustainability objectives of the framework proposed in the Scoping Report.</p> <p>SA of a Local Plan must comply with the Environmental Assessment of Plans and Programmes Regulations 2004 (the "SEA Regulations") and Section 19 of the Planning and Compulsory Purchase Act, which sets out requirements for SA. SA is a complex and legalistic process and should be undertaken iteratively, alongside the preparation of the Plan. A Local Plan must be prepared in accordance with Section 39 of the Act "with the objective of contributing to the achievement of sustainable development". It should therefore be informed by the SA process, which itself must comply with the SEA Regulations.</p> <p>Scoping is the first stage of SA. It sets the framework for the process to follow so it is important at it is robust for a plan to be found sound at Examination. It is much more difficult and less credible to try to retrofit or remedy deficiencies in the SA process retrospectively. Therefore, the review focuses on the adequacy of the approach and content of the SA Scoping Report, with particular focus on the set of objectives proposed to form the SA Framework for the main appraisal of the Local Plan, to be undertaken at a later stage.</p> <p>The SA Scoping Report is considered to comply with the requirements</p>	<p>Noted</p>
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	<p>of the SEA Regulations and Section 19 of the Planning & Compulsory Purchase Act. Suggestions have been made, that if actioned and addressed in the next stage of the SA process, would be considered to improve its relevance and ensure a flexible and forward-looking approach to policy and potential site allocations, in a regulatory and policy environment that is changing rapidly.</p> <p>The Land at Pill Green scores very strongly against the proposed framework of sustainability objectives and is therefore considered to be a highly sustainable location for much-needed housing, that can be delivered quickly within the plan period and, importantly, reduce the need to travel by car due to its proximity to Bristol, nearby facilities and the ability to make use of the existing strong network of sustainable transport modes.</p>	<p>Site-specific assessments will be considered following the Call for Sites consultation at later stages in the plan preparation and the sustainability appraisal process.</p>
<p>Bloor Homes SW Ltd (Land at Churchill)</p>	<p>As this is only a Scoping Report at this stage, we primarily reserve our full comment until the Issues and Options Consultation in Summer 2020 when we envisage that a more complete Sustainability Appraisal will be available for comment.</p> <p>Notwithstanding this, we would request that in preparing the Sustainability Appraisal, the Council revisit the Sustainability Appraisal Framework provided at Table 13 and ensure that this would provide a robust appraisal. For example, with regards to SA Objective 1.5 ('Development which is unlikely to create excessive infrastructure requirements') it is noted that areas where funding for major infrastructure projects is secured will have a positive effect. However, this positive effect is not carried across within the wording for the scoring criteria. Areas that therefore benefit from such infrastructure funding already in place would not benefit within the scoring criteria. We anticipate that the revised Sustainability Appraisal that will be available within the Issues and Options Consultation will be more</p>	<p>Comments provided above (under No.4)</p>



	robust and we will comment in detail at this point on the intricacies of the evidence base.	
Bloor Homes SW Ltd and Aston & Co (Land at Portishead)	<p>As this is only a Scoping Report at this stage, we primarily reserve our full comment until the issues and Options Consultation in Summer 2020 when we envisage that a more complete Sustainability Appraisal will be available for comment.</p> <p>Notwithstanding this, we would request that in preparing the Sustainability Appraisal, the Council revisit the Sustainability Appraisal Framework provided at Table 13 and ensure that this would provide a robust appraisal. For example, with regards to SA Objective 1.5 ('Development which is unlikely to create excessive infrastructure requirements') it is noted that areas where funding for major infrastructure projects is secured will have a positive effect. However, this positive effect is not carried across within the wording for the scoring criteria. Areas that therefore benefit from such infrastructure funding already in place would not benefit within the scoring criteria.</p> <p>We anticipate that the revised Sustainability Appraisal that will be available within the Issues and Options Consultation will be more robust and we will comment in detail at this point on the intricacies of the evidence base.</p>	<p>Comments provided above (under No.4)</p> <p>Whilst the wording of Objective 1.5 is retained, there have been changes to the scoring criteria in order to clarify which type of development should be avoided. That is, development in Low Value Land areas (CIL Zone A) requiring essential major infrastructure or where funding for necessary major infrastructure is uncertain/ areas of low viability unable to secure affordable housing or CIL requirements will score poorly</p> <p>Further consultation will take place along with the Options Document.</p>



<p>Flax Bourton Parish Council</p>	<p>FBPC wishes to ensure that the Pre- Commencement Document and the Sustainability Appraisal Scoping Report encompass accurate, up to date and properly modelled Transport and Sustainability Assessments unlike those which the JSP process revealed as being flawed. We would, for example, be extremely concerned if NSC felt it could rely on previously commissioned transport evidence which transport experts at the JSP hearings heavily criticised.</p>	<p>A separate transport and sustainability assessment process will be undertaken at a number of stages in the preparation of a Local Plan.</p>
<p>Congresbury Residents Action Group</p>	<p>We are confused by the status of this document. Paragraph xii on Page 6 states:</p> <p>"The Scoping Report is published for consultation in accordance with the SEA Directive and Regulations. Consultation on an interim scoping report took place alongside the consultation on a Local Plan Issues and Options document in 2018.</p> <p>This revised scoping report will accompany the new Local Plan Challenges and Choices document which is due to be consulted on in May 2020."</p> <p>It is not clear if you are consulting on this document. We assume that this consultation will be undertaken as part of the consultation on the next iteration of the Local Plan. If this is not the case, then you need to issue the Sustainability Scoping Report separately for formal consultation.</p> <p>As flagged by the quotation from the Sustainability Scoping Report above, the Scoping Report refers to the next stage of the evolution of the Local Plan as the Local Plan Challenges and Choices document. But the Pre-commencement Document details the next stage of consultation to be on "Issues and Options". The terminology needs to be consistent and match across all documents.</p>	<p>Para xii. Is updated to reflect the change in NSC engagement strategy. The Scoping Report will accompany the 'Challenges' document which is due to be consulted on in July 2020.</p> <p>Formal consultation with the statutory organisations took place between 10 March 2020 – 22 April 2020. Further consultation will take place with the Challenges document.</p> <p>Noted</p>



<p>Hallam Land Management Ltd</p>	<p>Regarding the Sustainability Appraisal ('SA'), the SA Scoping Report provides a good starting point from which to conduct a SA process. HLM do, however, have the following comments in relation to the five questions set out.</p> <p>1. Have all relevant plans and programmes been referenced?</p> <p>Yes, this is made clear throughout the SA and in the schedule at Appendix 1. What is not clear, however, is how the new Local Plan will interact with the West of England Joint Local transport Plan 4, the West of England Strategic Economic Plan, including how (or if) it will utilise the West of England evidence base for documents that are not listed for renewal by NSC, such as the Wider Bristol Strategic Housing Market Assessment. We trust that this will be clearly communicated in the Issues and Options document.</p> <p>2. Is any significant environmental, social or economic data missing or misrepresented?</p> <p>It is noted and supported that Clevedon, Nailsea and Portishead are recognised in the baseline assessment as forming a standalone tier of settlements, second only in sustainability terms to Weston-super-Mare, and that this is carried forward into the scoring matrix for Objective 1.1, thus forming an appropriate starting point for the spatial strategy that aligns with the current settlement hierarchy.</p> <p>From an environmental perspective, it is important that land benefitting from flood defence is recognised in the baseline conditions. Development in such locations is inherently more sustainable in flood risk management terms than other land within the Flood Zone 3A area, subject of course to the capacity and condition</p>	<p>Noted.</p> <p>Defences can be breached or overtopped, so the consequences for development need to be assessed against a 'worst</p>
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of said flood defences. Indeed, the precedent for development in such areas has already been set at the Weston Villages, which predominantly lie within tidal Zone 3A though benefit from existing flood defence. We trust that this matter will be addressed by and assessed in the new Strategic Flood Risk Assessment and feed into the SA process.

3. Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan?

HLM note, as is procedurally correct at this stage, that Green Belt is not within the proposed SA scope, which allows for a fair assessment of all prospective development sites in a policy off scenario. The Green Belt and any revisions to it will however have to be considered and justified as part of the refinement of the site selection process, with Green Belt sites released only if their particular sustainability credentials demonstrate exceptional circumstances.

4. Do you agree with the proposed Sustainability Appraisal framework?

HLM would comment that the scoring matrix for Objective 3.4 (minimising impact on treasured landscapes) does not sufficiently prioritise the protection of the Mendip Hills AONB and their setting over and above local landscape character areas. This runs contrary to NPPF Paragraph 72 which affords AONBs the highest status of policy protection. It follows, therefore, that sites within and/or adjacent to the AONB should receive the lowest score for this objective, leaving the other areas of 'high landscape sensitivity'

case' scenario. The existence of flood defences normally has no bearing upon the designation of the flood zones.

Noted.

Reference to sites of high landscape sensitivity is made in the scoring indicators for Objective 3.4. It does not exclude sites in the AONB or within its setting. The AONB is



	<p>elsewhere in the District to receive the second lowest scores.</p> <p>As alluded to in our response to question 2 above, it is believed that development on land benefitting from flood defences should be scored less negatively than development elsewhere in Zones 3A and 3B. The scoring matrix to Objective 3.3 (minimising vulnerability to tidal and fluvial flooding) should be re-structured to reflect this.</p> <p>With the exception of the above, the SA framework and scoring matrices are considered to be generally robust. The view taken on greenfield development is pragmatic and reasonable, as is the admittance of the need to build in high value areas to better generate funds for supporting infrastructure. We support the approach set out in Appendix 2 that allows embedded mitigation in the form of schools, transport infrastructure and community facilities to be assumed as deliverable on sites above certain capacity thresholds. This allows a fair and realistic comparison between sites of all scales in terms of their accessibility to key services.</p> <p>5. Is the proposed methodology for the next stages of the SA correct?</p> <p>The proposed methodology as currently presented is considered to generally align with National Planning Practice Guidance.</p>	<p>specifically referenced. Suggested change in p.60</p> <p>Defences can be breached or overtopped, so the consequences for development need to be assessed against a 'worst case' scenario. The existence of flood defences normally has no bearing upon the designation of the flood zones.</p> <p>Noted.</p>
Parish Councils Airport Association	<p>Sustainability Appraisal Scoping Report 2020: The report acknowledges that the Bristol Airport planning application 18/P/5118/OUT was refused and that '<i>planned expansion has the potential to impact a range of environmental (and socio-economic) receptors</i>'. Thus, the Association believe that the Airport should</p>	Noted



	<p>remain constrained at 10 mppa and the permitted development rights of the Airport should be removed. Removing the permitted development rights of the Airport goes beyond the 'Retain Existing Policy, Option 1' in the consultation titled 'Local Plan 2036, Issue and Options'. We request that this point is considered in the next stage of consultation.</p>	
<p>Harrow Estates</p>	<p>Question 1 - Have all relevant plans and programmes been referenced? No comments</p> <p>Question 2 - Is any significant environmental, social or economic data missing or misrepresented?</p> <p>Paragraph 2.3 outlines a range of issues to be addressed in the Local Plan, each falling into the categories Economic, Social and Environmental. We consider that issue 5 '<i>Meeting communities' needs for well-designed/ energy efficient housing, including affordable housing</i>' should be expanded to include needs in respect of local services and facilities in existing communities. It is important that both existing and new communities have an appropriate balance of uses to enable it to be considered genuinely sustainable.</p> <p>Furthermore, issue 12 '<i>Reduce the need to travel by car</i>' should also be expanded to include reference to the need for appropriate growth to support and sustain public transport opportunities. This is critical for North Somerset given that 24% of the working population travel to work in Bristol or elsewhere is South Gloucestershire with 74% of work journeys undertaken by car / van (paragraph 3.36). The percentage of people across the whole of North Somerset is only 5.5% against a UK average of 16.4% (paragraph 3.37).</p>	<p>Noted p.13</p> <p>Whilst the economic viability and the availability of public transport options are not within the remit of the local plan, this issue is addressed in p.44 under the key issue: Car-based travel.</p>



	<p>The strategic location of development on existing public transport routes is therefore a fundamental prerequisite of any robust strategy in North Somerset. It is noteworthy that the JSP representations made by Stagecoach Bus identified that the SDL's at Banwell and Churchill would be "entirely car dependent from the outset".</p> <p>The idea of proximity to Bristol was explored further by Stagecoach at the JSP examination (Reference M4/58); <i>"Set against these fundamental concerns and doubts, there seems little doubt that a range of potential strategic sites adjoining or close to the Bristol Urban Area, could technically deliver new homes in locations that would represent a much more deliverable and sustainable pattern of development than many of the SDLs already selected, and at the very least, could represent more robustly deliverable sources of housing supply over the plan period. Such locations could benefit from key sustainable transport infrastructure and services already in place, often on existing strong interurban bus corridors, or where it could be relatively much more cost-effectively provided; or both"</i>.</p> <p>Question 3 - Are there any additional sustainability issues within North Somerset that need to be considered in the development of the New Local Plan document?</p> <p>Table 11 of the SA Scoping Report identifies 'Inequality' as being one of the sustainability issues and specifically the need for <i>"better and more sustainable access to jobs, services, facilities and amenities for all"</i>. Whilst this is certainly not disputed, it is important to acknowledge that the need for such accessibility is not limited to those areas with higher levels of deprivation. There are areas of the district with lower levels of deprivation with lower levels of accessibility to services,</p>	<p>Noted. The preferred locations for development will be considered in Stage B and C of the Sustainability Appraisal, whereby spatial strategy options will be reviewed and refined.</p> <p>The key issue is to tackle existing social inequalities within the district due to the presence of areas ranking high based on the Index of Multiple Deprivation 2019. The focus on the most</p>
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	<p>particularly for the elderly, the less mobile or people who do not drive a car.</p> <p>The absence of reference to Green Belt in table 11 is welcomed as the sustainability of sites and areas needs to be undertaken on a 'policy off' basis to ensure sites and locations are assessed objectively. In this regard, we consider the schedule of evidence base documents to be undertaken by the Council needs to be extended to include a landscape assessment as a separate document to the Green Belt assessment.</p> <p>Question 4 - Do you agree with the proposed Sustainability Appraisal Framework?</p> <p>We consider that the SA Framework Objectives matrix at table 12 needs to be amended at 2.1 '<i>Boost delivery and meet the housing need identified within the plan period</i>'. This is marked on the table as being a social issue but we believe that this should also be relevant to economic given the signify can't boost to the local economy in both construction and operational phases. Furthermore at 2.3 '<i>Achieve reasonable access to a wide range of community, educational, town centre and healthcare facilities</i>' should be included as an environmental issue because appropriate location of uses can reduce the need for journeys to be undertaken by private car.</p> <p>Question 5 - Is the proposed methodology for the next stages of the Sustainability Appraisal correct?</p> <p>Broadly, yes, we agree with the Council's outline of the next steps. However, there has been no reference within either the Pre-Commencement Document or the Sustainability Appraisal Scoping</p>	<p>deprived areas aims at addressing existing spatial injustices in the provision and allocation of employment land and other key facilities.</p> <p>Noted.</p> <p>Noted and amended table 12 to reflect these comments (2.3)</p>
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	<p>Report to a call for sites consultation. We consider that it is essential for this stage of the process to ascertain the sites that are available for development.</p>	<p>A call for sites consultation will be launched in tandem with the 'Challenges' consultation.</p>
<p>Lands Improvement</p>	<p>The Council have also published a Sustainability Assessment Scoping Report alongside the PCD. The purpose of the document is to set out a framework to guide the assessment of spatial strategy options, sites and policies of the new Local Plan. This will assist with the understanding of the impacts of the potential options in environmental, social and economic terms. A preferred spatial option will then be identified within the draft Local Plan, prior to its submission to the Inspectorate.</p> <p>Paragraph xii provides a list of questions that the Council are specifically seeking responses to as part of the current consultation. We have no comment to make in respect of Questions 1, 2 and 5 but have provided the following response to Questions 3 and 4 below.</p> <p>Question 3 – Are there any additional sustainability issues within North Somerset that need to be considered in the development of the new Local Plan?</p> <p><i>Deliverability</i></p> <p>Whilst the sustainability issues listed provide a relatively comprehensive overview of the key issues affecting North Somerset, we consider that the issue of delivery/deliverability has been underplayed in the identification of important issues.</p>	<p>Deliverability as well as the Green Belt will be considered as factors during the plan making process, when the options are being tested and refined and along with the SA in bringing forward the Local Plan. It is not an issue to be considered under the SA process.</p>



As we have alluded to previously in the representations, the adopted Local Plan has failed to deliver the necessary homes, employment floorspace and supporting infrastructure for a number of years.

This has been manifested in the Council's housing supply and delivery record of the plan period to date. On the matter of supply, the Council's stated position that it can demonstrate a 4.4 years supply of housing land is extraordinarily tenuous when other estimates indicate that it could be as low as 1.69 years when properly assessed against national guidance.¹ Indeed, it is important to note that the Council's position, regardless of the actual level of supply, has had to be underpinned in recent years by speculative development across the district, thus reinforcing the ineffectiveness of the adopted plan and its proposed site allocations.

Furthermore, the housing delivery test results also make poor reading for the Council, showing that they have only delivered 78% of their housing requirement over the past 3 years. Again, this highlights the fact that the Council's current strategy has been woefully deficient in meeting its delivery needs over the current plan period.

The knock-on impact of the failure to maintain an adequate supply of housing land and deliver the minimum housing requirement over a number of years has hindered the ability of the adopted plan to deliver its aspirations (e.g. reductions in out-commuting) and had adverse impacts on important social issues (e.g. housing affordability). The deliverability of a plan, allocation or policy is an important consideration given that there can be significant environmental, social and/or economic consequences if it cannot be implemented. This should, therefore, be a significant factor in their assessment as



part of the sustainability appraisal and we do not consider that this has been explored sufficiently within the Scoping Report.

Green Belt

We welcome the absence of any reference to the need to protect the Green Belt for the purposes of assessing the sustainability of spatial options. Whilst we agree that the Green Belt is an important national designation and that it should be protected in line with the provisions of the NPPF and PPG, it is not an environmental, ecological or landscape designation that is, necessarily, any less *sustainable* to build on than land outside of the Green Belt.

In simple terms, Green Belt land is no more/less sustainable to develop than non-Green Belt land and this should be reflected in the SA, as it currently appears it will be.

Furthermore, it is important to consider the sustainability credentials of strategies that both do and do not involve the release of Green Belt land in order to demonstrate that exceptional circumstances exist to amend Green Belt boundaries. There are significant amounts of Green Belt land in highly sustainable locations. These locations include, to the south-west of Bristol, Portishead and other key service centres on important transit routes to/from these larger settlements – e.g. Easton-in-Gordano and Long Ashton. The sustainability appraisal will likely show that there are significant sustainability benefits to delivering development in these locations, relative to spatial options that do not. This, in turn, can support an argument to release land from the Green Belt to meet development needs in line with national policy/guidance.

Indeed, the purposes of the Green Belt are largely spatial, rather than environmental. However, some of them, i.e (a) *to check the unrestricted sprawl of large built-up areas*; (c) *to assist in safeguarding the countryside from encroachment*; (e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land* serve the achievement of higher sustainability outcomes.

The boundaries of the Green Belt can be altered only through a review of the local plan, and, even then, only in exceptional circumstances. NPPF 138 provides that,



	<p>Question 4 - Do you agree with the proposed Sustainability Appraisal Framework?</p> <p>We are generally supportive of the Sustainability Appraisal Framework and, following on from our comments above, welcome the absence of any impacts on the Green Belt from the assessment of a site's sustainability credentials.</p> <p>However, following on from our comments regarding deliverability, we consider that this should be more prominent within any assessment.</p> <p>We note that delivery is touched upon at SA Objectives 1.5 and 2.1 and we welcome this acknowledgement. However, for the reasons set out above, we consider that <u>deliverability should be a stand-alone SA Objective within the framework.</u></p>	<p>when considering Green Belt boundaries during the plan process, decision-makers will need to take into account sustainable patterns of development.</p>
<p>Barratt Homes (Bristol) Ltd</p>	<p>The Council have also published a Sustainability Assessment Scoping Report alongside the PCD. The purpose of the document is to set out a framework to guide the assessment of spatial strategy options, sites and policies of the new Local Plan. This will assist with the understanding of the impacts of the potential options in environmental, social and economic terms. A preferred spatial option will then be identified within the draft Local Plan, prior to its submission to the Inspectorate.</p> <p>Paragraph xii provides a list of questions that the Council are specifically seeking responses to as part of the current consultation. We have no comment to make in respect of Questions 1, 2 and 5 but have provided the following response to Questions 3 and 4 below.</p>	<p>Response to comments provided above</p>



Question 3 – Are there any additional sustainability issues within North Somerset that need to be considered in the development of the new Local Plan?

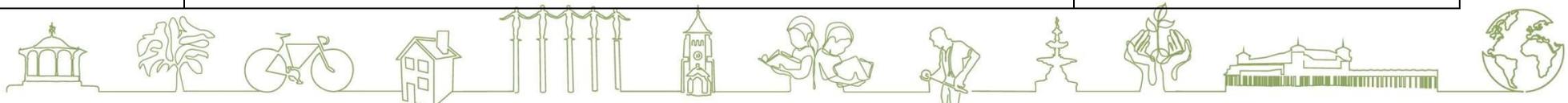
Deliverability

Whilst the sustainability issues listed provide a relatively comprehensive overview of the key issues affecting North Somerset, we consider that the issue of delivery/deliverability has been underplayed in the identification of important issues.

As we have alluded to previously in the representations, the adopted Local Plan has failed to deliver the necessary homes, employment floorspace and supporting infrastructure for a number of years.

This has been manifested in the Council's housing supply and delivery record of the plan period to date. On the matter of supply, the Council's stated position that it can demonstrate a 4.4 years supply of housing land is extraordinarily tenuous when other estimates indicate that it could be as low as 1.69 years when properly assessed against national guidance.¹ Indeed, it is important to note that the Council's position, regardless of the actual level of supply, has had to be underpinned in recent years by speculative development across the district, thus reinforcing the ineffectiveness of the adopted plan and its proposed site allocations.

Furthermore, the housing delivery test results also make poor reading for the Council, showing that they have only delivered 78% of their housing requirement over the past 3 years. Again, this highlights the fact that the Council's current strategy has been woefully deficient in meeting its delivery needs over the current plan period.



The knock-on impact of the failure to maintain an adequate supply of housing land and deliver the minimum housing requirement over a number of years has hindered the ability of the adopted plan to deliver its aspirations (e.g. reductions in out-commuting) and had adverse impacts on important social issues (e.g. housing affordability). The deliverability of a plan, allocation or policy is an important consideration given that there can be significant environmental, social and/or economic consequences if it cannot be implemented. This should, therefore, be a significant factor in their assessment as part of the sustainability appraisal and we do not consider that this has been explored sufficiently within the Scoping Report.

Green Belt

We welcome the absence of any reference to the need to protect the Green Belt for the purposes of assessing the sustainability of spatial options. Whilst we agree that the Green Belt is an important national designation and that it should be protected in line with the provisions of the NPPF and PPG, it is not an environmental, ecological or landscape designation that is, necessarily, any less *sustainable* to build on than land outside of the Green Belt.

In simple terms, Green Belt land is no more/less sustainable to develop than non-Green Belt land and this should be reflected in the SA, as it currently appears it will be.

Furthermore, it is important to consider the sustainability credentials of strategies that both do and do not involve the release of Green Belt land in order to demonstrate that exceptional circumstances exist to amend Green Belt boundaries. There are significant amounts of Green Belt land in highly sustainable locations. These locations



	<p>include, to the south-west of Bristol, Portishead and other key service centres on important transit routes to/from these larger settlements – e.g. Easton-in-Gordano and Long Ashton. The sustainability appraisal will likely show that there are significant sustainability benefits to delivering development in these locations, relative to spatial options that do not. This, in turn, can support an argument to release land from the Green Belt to meet development needs in line with national policy/guidance.</p> <p>Question 4 - Do you agree with the proposed Sustainability Appraisal Framework?</p> <p>We are generally supportive of the Sustainability Appraisal Framework and, following on from our comments above, welcome the absence of any impacts on the Green Belt from the assessment of a site's sustainability credentials.</p> <p>However, following on from our comments regarding deliverability, we consider that this should be more prominent within any assessment.</p> <p>We note that delivery is touched upon at SA Objectives 1.5 and 2.1 and we welcome this acknowledgement. However, for the reasons set out above, we consider that deliverability should be a stand-alone SA Objective within the framework.</p>	
Woodland Trust (SW)	Regarding the ' <i>Potential role of the- North Somerset Local Plan</i> ' for the ' <i>Climate Emergency</i> ' (pg. 49), we would expect this to also include the role of natural climate solutions in not only capturing and storing carbon, but also helping build resilience to the impacts of climate change (i.e. role- of green infrastructure in reducing flood risk, urban heating, etc.) - and thus the interrelated goals of nature recovery and	Having reviewed other SAs, it is considered that climate change adaptation is covered within objectives relating to flooding, water supply, biodiversity and green infrastructure



	<p>responding to the climate emergency. This area should also explicitly address both mitigation and adaptation to climate change.</p> <p>We welcome the acknowledgement on pg. 59 (Biodiversity, Geodiversity & Green Infrastructure) that development can both enhance and negatively impact on ecological corridors. It is crucial that a systems-based approach (which considers connectivity and scale) is taken to the application of Biodiversity Net Gain and natural capital.</p>	<p>provision. Have added some wording in objective 3.6 - Protect and where possible enhance Biodiversity, Geodiversity and <u>allow its adaptation to climate change</u>.</p> <p>Guidance on climate change adaptation is provided in the Creating Sustainable Buildings and Places SPD this is due to be updated this year.</p> <p>We are committed to fulfil the Duty to cooperate and the new GI strategy will flow from the WoE strategy. New WoE tree strategy is being developed. This will be high-level doc with appropriate areas identified – including space for more urban trees.</p>
European Property Ventures (Somerset) Ltd	The Pre-Commencement Document establishes that a framework for the Sustainability Appraisal will be agreed at the outset and used to assess and inform the plan-making process. It is essential that this assessment is undertaken in a transparent and robust manner, with all reasonable alternative spatial strategies given appropriate consideration. Claremont Planning has reviewed the Sustainability	This level of detail is deemed appropriate to the stage of the SA process we are at – Stage A (please refer to Paragraph 1.19 for what this stage involves)



<p>(Claremont Planning)</p>	<p>Appraisal Scoping Report published alongside the Pre-Commencement Document which identifies the approach the Council will take when progressing the emerging Local Plan. The Scoping Report establishes the major constraints that should be taken into consideration when identifying the proposed spatial strategies and appropriate alternatives. This includes but is not limited to Green Belt and AONB designations; RAMSAR sites, SPAs and SACs; and flood risk from both tidal and fluvial sources. Whilst the Scoping Report sets out at a high level issues such as the 'scale of the challenge' and 'potential role of the North Somerset Local Plan' in respect of constraints and other challenges, there is a lack of detail provided at this stage as to how the constraints will be overcome and an appropriate spatial strategy devised that reaches an appropriate balance between protecting the environment and respecting designations, whilst delivering sufficient housing to meet requirements. It is essential that the Sustainability Appraisal process that accompanies the preparation of the Local Plan accurately captures the decision-making with regards to the level of housing being proposed and the spatial strategy that is to be pursued, in order to demonstrate that this is the most appropriate strategy when compared to reasonable alternatives. This should include cross-boundary opportunities, which must be given the highest consideration at the earliest stage of plan-making.</p>	<p>Noted. It is ensured that these will be taken into account in the second and third (stages B and C) stages, being the actual appraisal stages.</p>
<p>The Newcombe Estates Company Limited</p>	<p>There is concern that the approach to the Green Belt through the Local Plan process will not consider, in sufficient detail, the opportunities for sustainable development to be provided at sites/locations which do not make an important contribution to the five purposes of the Green Belt as defined in national policy.</p> <p>In this context, Appendix 1 to the SA Scoping Report lists a range of plans, programmes and policies and reviews their relationship with the local plan. For example, in respect of National Planning Policy</p>	<p>The boundaries of the Green Belt can be altered only through a review of the local plan, and, even then, only in exceptional circumstances. NPPF 138 provides that, when considering Green Belt boundaries during the plan</p>



	<p>and Climate change, Appendix 1 states: “Local Policies will need to achieve these objectives”.</p> <p>This ‘relationship’ is therefore how the Local Plan intends to respond to existing plans and programmes etc. Such a review is an important part of the plan-making process, but we are concerned that on specific matters, the commentary set out at Appendix 1, suggests that the impact (response of Local Plan) in terms of the future Spatial Strategy is already pre-determined.</p> <p>In the context of the Green Belt, Appendix 1 (page 69-70) identifies the requirements and objectives of the NPPF and the ‘protection’ of the Green Belt. It correctly recognises that the Local Plan must conform to these objectives. In terms of the adopted Core Strategy, page 78 of Appendix 1 refers to the objective of continuing to support the ‘existing’ Green Belt and states that the relationship of the Local Plan will be to: “Ensure that commitments identified in the Core Strategy are carried through.”</p>	<p>process, decision-makers will need to take into account sustainable patterns of development.</p> <p>The future of the Green Belt has not been pre-determined as there is no reference in relation to the retention or release of parts of the existing Green Belt land. The protection of the Green Belt will continue being an objective for the Local Plan.</p>
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