



West Somerset Local Plan
2012 – 2032 Preferred
Strategy

Sustainability Appraisal
Report

NON TECHNICAL SUMMARY

Prepared for:

**West Somerset Council
Williton, Somerset**

Prepared by:

**ENVIRON
Exeter, UK**

Date:

February 2012

Project or Issue Number:

64C11133

Contract/Proposal No:	64C11133
Issue:	3
Author	
(signature):	
Project Manager/Director	
(signature):	
Date:	February 2012

This report has been prepared by ENVIRON with all reasonable skill, care and diligence, and taking account of the Services and the Terms agreed between ENVIRON and the Client. This report is confidential to the client, and ENVIRON accepts no responsibility whatsoever to third parties to whom this report, or any part thereof, is made known, unless formally agreed by ENVIRON beforehand. Any such party relies upon the report at their own risk.

ENVIRON disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the Services.

Version Control Record				
Issue	Description of Status	Date	Reviewer Initials	Authors Initials
A	First Draft	16/11/11	JC	EJ
B	Second draft	06/12/11	JC	EJ
1	Draft to Client	09/12/11	JC	EJ
2	Final	17/01/12	JC	EJ
3	Final	15/02/12	JC	EJ

Table of Contents

1	Introduction	1
1.1	Background	1
1.2	Habitat Regulations Assessment	1
1.3	How to comment on this report	2
2	The West Somerset Local Plan Preferred Strategy	2
2.1	Introduction	2
2.2	Relationship with other plans and programmes	3
2.3	How environmental protection objectives have been taken into account	4
3	The Sustainability Baseline	4
4	How the Assessment was Undertaken	13
4.1	Introduction	13
4.2	Questions used to guide the SA	13
4.3	How the assessment was carried out	14
5	Results of the SA	15
5.1	Assessing alternative options	15
5.2	Results of the SA	15
5.3	Cumulative effects assessment	16
5.4	Difficulties encountered in the SA	17
6	Monitoring	35
7	Next Steps	39

List of Tables

Table NTS 3.1: Sustainability baseline summary	5
Table NTS 4.1: SA Framework	13
Table NTS 4.2: SA scoring	14
Table NTS 5.2: Effects of the Plan	28

1 Introduction

1.1 Background

This is the Non-Technical Summary of the Sustainability Appraisal Report (SA report) for the latest draft of the West Somerset Local Plan (the version known as the West Somerset Local Plan Preferred Strategy) (hereafter in this report referred to as the plan or Local Plan).

The plan outlines policies to guide development within West Somerset to 2032. It also includes a number of broad development areas for both housing and employment.

In order to test its effects on the environment and other important social and economic objectives the preparation of the Local Plan has been subject to an integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) process in line with the requirements of international and national regulations (hereafter in this report referred to as a SA). The SA is being carried out by an independent consultancy firm ENVIRON.

Regulations require that at some point in the drafting of the Local Plan an assessment is carried out and a SA report is produced and consulted on. The SA report should set out the results of the SA process, outline why alternatives were selected, report on the assessment of the draft Local Plan and outline a programme for monitoring the effects of the plan. The full SA report is available from <http://www.westsomersetonline.gov.uk/Home.aspx>.

This document is a summary in non technical language of the contents of the SA report.

1.2 Habitat Regulations Assessment

The Conservation of Habitats and Species Regulations 2010 require any plan or project not directly connected with or necessary to the management of European designated sites (collectively termed Natura 2000 [N2K] sites and comprising SACs and SPAs together with Ramsar sites which are afforded the same level of protection in the UK) but which are likely to have a significant effect thereon, either individually or in combination with other plans or projects, to be subject to a Habitat Regulations Assessment (HRA).

The term HRA refers to the assessment of the implication of a proposed plan on one or more European Designated Sites in view of the sites' conservation objectives. HRA is based on a rigorous application of the precautionary principle and therefore requires those undertaking the exercise to prove that the plan will not have a significant effect on these conservation objectives. Where uncertainty or doubt remains, an adverse effect should be assumed.

The first stage of the HRA process is screening. The screening process involves the review of the proposed plan to identify any 'Likely Significant Effects (LSEs) on the European Designated Site/s either alone or in combination with other projects or plans. If, following screening, LSEs are anticipated, a 'full' assessment (termed an appropriate assessment) would assess the impact on the integrity of European Designated Sites, either alone or in combination with other projects or plans, with respect to the sites' structure and function and its conservation objectives. Appropriate assessment would also determine whether alternative measures could be adopted in order to avoid adverse effects. If there are no viable alternatives, a plan can only be implemented if there are 'imperative reasons of overriding public interest'.

A screening assessment has been carried out for the plan and is outlined in a separate report. The screening assessment has concluded that provided the counteracting measures as set out in Chapter 7 of the HRA Screening assessment report are incorporated into the final Local Plan, the plan is unlikely to have a significant effect on the conservation objectives of the Natura 2000 sites assessed at this stage of its development.

These counteracting measures are:

- the inclusion of a Bat Consultation Zone policy;
- the development limit is added to the key diagram for Minehead for sites A4, A5 and A6;
- additional policy text under Policy MD2 and within Appendix 1 for strategic site numbers A4, A5 and A6 in Minehead to offset potential impacts on barbastelle bats; and
- the inclusion of a Wetland Bird Consultation Zone policy.

If the above recommendations are incorporated into further development of the Local Plan no further stage of assessment under the Habitats Regulations would be required.

1.3 How to comment on this report

The SA report is being published for comment alongside the West Somerset Local Plan Preferred Strategy. If you have any comments on this report please respond as indicated below:

The primary means of responding to this consultation is to use the website at:

<http://www.westsomersetonline.gov.uk/Home.aspx>

Alternatively representations can be made by e-mail to ldf@westsomerset.gov.uk

or by post to: Planning Policy Team, West Somerset Council, West Somerset House, Killick Way, Williton, TA4 4QA

2 The West Somerset Local Plan Preferred Strategy

2.1 Introduction

The plan includes a spatial vision, strategic objectives and a number of policies for achieving the Local Plan objectives, setting out how much development is intended to happen where and by what means it will be delivered. The spatial vision for the plan addresses the economy, housing and environment of the district. The spatial vision is given more detail through the spatial objectives. The spatial objectives are shown Box 1.

Box 1: Spatial Objectives

- Strengthening the roles and functions of Minehead as the District's main service centre, and Watchet and Williton as secondary service centres;
- Implementation of types and quantities of development in locations appropriate to meet the requirements of the Strategy based on the evidence and engagement;
- Increase self-containment within Minehead, Watchet and Williton;
- Successfully managing flood risk in implementing new development at Minehead Watchet and Williton;
- Make a step change in the provision of affordable housing to meet identified local needs;
- Make a significant reduction in Co2 emissions for the Local Plan area;
- Create an aspirational, enterprising and entrepreneurial culture within West Somerset;
- Develop the quality of the tourism offer within the Local Plan area;
- Protect and enhance biodiversity in the Local Plan area;
- Conserve and enhance the character of historic settlements, buildings and landscapes; and
- Deliver high quality design in new development which will contribute to the area's heritage in a positive way.

The plan policies are grouped under the following headings:

- Presumption in favour of sustainable development;
- Hinkley Point and other major energy generating development;
- Sustainable communities;
- Settlement policies Minehead;
- Settlement policies Watchet;
- Settlement policies Williton;
- Settlement policies - other;
- Economy;
- Transport;
- Community facilities and public health;
- Climate change;
- Natural and historic environment;
- Gypsies and travellers; and
- Implementation policies.

2.2 Relationship with other plans and programmes

The Local Plan also helps to achieve the objectives of a number of international, national and local plans and programmes:

- International legislation and policy which sets a number of targets, objectives and obligations which planning documents must seek to achieve;
- National legislation and policy which outlines measures to achieve many of these obligations through setting regional and local targets for public bodies to achieve and by outlining principles which planning policies and decisions needs to adhere to; and
- Local and regional policy sets out more specific local targets and local actions needed to achieve them.

Particularly important for the Local Plan are international obligations and objectives on various environmental issues such as air quality standards, climate change and biodiversity; and national and regional targets on housing affordability, flooding, development on brownfield land etc. It is the job of the Local Plan to ensure that the land use implications of meeting these targets are fully considered.

2.3 How environmental protection objectives have been taken into account

Regulations require that the SA considers how environmental protection objectives are taken into account in the development of the plan or programme. For the Local Plan this has been done in the following way. A full review of the important objectives has been undertaken for each topic (e.g. air quality and noise, health, biodiversity, etc.). These objectives have then been used to develop what is called an SA framework. The SA framework is then used to test the Local Plan and recommendations are made to strengthen the Local Plan. The SA framework is shown in Table 4.1.

3 The Sustainability Baseline

The SA team has collected information on the current state of the environment (including any problems, issues and characteristics of the plan area) and how it is likely to change in the absence of the plan. This enables the SA team to have an accurate view of what changes the plan could give rise to within the plan area. A summary of this work is presented in Table 3.1.

Table NTS 3.1: Sustainability baseline summary	
Sustainability baseline / issues / characteristics of the area	Evolution without the plan
1. Air and noise	
<ul style="list-style-type: none"> • Air pollution is not a significant issue in West Somerset (WS). NO₂ objectives for 2010 are likely to be met. • Ozone levels high in the whole of the South West including WS. • There are seasonal traffic peaks which cause congestion in WS. • Noise and loss of tranquillity may worsen with the increase in air traffic. 	<ul style="list-style-type: none"> • Air pollution likely to remain insignificant. • Noise pollution and loss of tranquillity may worsen with increasing levels of air traffic. • Traffic congestion and delays on changeover days at Butlins will not necessarily improve as action will not be taken through the current or future Local Transport Plan/FTP. • Traffic flows on roads in WS likely to remain low in comparison to many areas of the county but are likely to increase as population increases and development occurs.
2. Climate and energy	
<ul style="list-style-type: none"> • WS's greenhouse gas emissions decreased between 2005 and 2009 from 401 ktonnes in 2005 to 372 ktonnes in 2009. However, are higher per person than the UK. • Average gas and electricity consumption have decreased in WS over past four years. • WS not sufficiently engaged with climate change adaptation forums within region. Future adaptation strategies will need to be developed to prepare for changes to come. • WS average consumption of electricity was much higher than the UK as a whole. However, gas consumption was lower. • Climate change will have a number of effects including effects on temperature, sea level rises, river and coastal flooding. This will affect coastal areas of WS and areas such as Williton. • Climate change adaptation is important. Effects on physical infrastructure, health, energy demands and demands for outdoor recreation need 	<ul style="list-style-type: none"> • Global and national temperature rise, sea level rise, warmer and wetter winters can be expected to continue at least in the medium term due to the response of the climate system to past emissions. • The number of renewable energy developments and heat / power generated has been steadily increasing over the last few years although it needs to increase significantly. • WS's greenhouse gas emissions could continue to decrease but continuing action, e.g. national level incentives, would be needed in order to maintain this trend. • Average gas and electricity consumption could continue to decrease in WS. Average electricity use may continue to be much higher than in the UK.

Table NTS 3.1: Sustainability baseline summary	
Sustainability baseline / issues / characteristics of the area	Evolution without the plan
<p>consideration.</p> <ul style="list-style-type: none"> • WS has small number of projects generating renewable electricity and heat but has the capacity to generate more. • 80% of Somerset residents support use of renewable energy. 	
3. Crime	
<ul style="list-style-type: none"> • WS has lowest overall crime of all districts in Somerset. General trend in overall crime is down in WS (although there was an increase in 2006/07). • House burglaries are especially low compared with the UK (and are down 14.2% in 2006/07); • Criminal damage and other theft offences are most common form of crime in WS accounting for 21% of crime each. Sexual offences account for less than 1% of crimes and drug offences account for 3% of crime. • A high % of residents in WS feel safe both in the day and after dark in the District. Indicates people could be less worried about crime against the person than they are about crimes such as theft. • Police emergency response rates are improving. In 2006/07 85% of emergency calls in rural areas were attended in less than 20 minutes; 72% in urban areas were attended in less than 10 minutes. • There is a concern about motor vehicle theft in WS. Theft of motor vehicles increased by 31% in 2006/07. 	<ul style="list-style-type: none"> • Crime levels in WS are historically low and are likely to continue to be low. • The Police emergency response rates are likely to continue to improve. • Motor vehicle theft could continue to be a concern.
4. Public infrastructure	
<ul style="list-style-type: none"> • Traffic flows are seasonal and dependent on tourist season. Peak traffic flows in the summer are 30% higher than at other times. Measures have been proposed for transport infrastructure in WS, many of which are unlikely to go ahead because of lack of funding. • Traffic has increased by 14% on the A358 and 13% on the A39 between 	<ul style="list-style-type: none"> • Traffic flows are likely to continue to be a problem without transport infrastructure. • Broadband access is improving and is likely to improve further in the future.

Table NTS 3.1: Sustainability baseline summary	
Sustainability baseline / issues / characteristics of the area	Evolution without the plan
<p>1988 and 1998. However, this compares to an average national and county traffic growth of 21% and 13% respectively during the same period.</p> <ul style="list-style-type: none"> Broadband infrastructure is improving but is still poor in some areas. 	
5. Population and social inclusion	
<ul style="list-style-type: none"> WS has lowest population density in the region, which could have implications for providing services to a dispersed population. Inward migration is main cause of population growth, which is putting pressure on the local housing market, particularly as the district has a large proportion of second home owners. The area has a high percentage of people within older age bands (65 years and over), which could put pressure on health care services and affect the available local workforce for employers. WS has the highest level of deprivation compared to the rest of Somerset. Lack of affordable housing is a key issue. Average house prices are some of the highest in the county. Low level of provision of affordable housing in recent years is a cause of continuing concern for the council. Adequate housing sites are likely to come forward in next five years. 	<ul style="list-style-type: none"> By 2025 there will be a 14% rise in the total population of Somerset. However, population growth in WS is likely to be lower than Somerset as a whole. Population density will always be low and there will always be issues around providing services. The population of the district is ageing and will continue to age also causing issues with service provision. Deprivation in parts of WS is likely to remain a problem especially in light of the recent recession and higher youth unemployment rates. Housing affordability will remain a significant issue in the absence of action taken in the Local Plan.
6. Soils and geology	
<ul style="list-style-type: none"> Some areas of WS are classed as the best and most versatile agricultural land. Two sites registered under the Geological Conservation Review (GCR). These are Blue Anchor to the Lilstock Coast and Glenthorne. Very low levels of mineral activity restricted to small scale working of building stone. 	<ul style="list-style-type: none"> The level of mineral development in WS will stay low in the future. Future development on brownfield sites is likely to be near zero.

Table NTS 3.1: Sustainability baseline summary	
Sustainability baseline / issues / characteristics of the area	Evolution without the plan
<ul style="list-style-type: none"> • Low levels of new development on previously developed land. • No sites classed as contaminated in WS. 	
7. Waste	
<ul style="list-style-type: none"> • Waste recycled and composted in WS has slightly decreased in recent years and the amount of household waste collected per head in WS appears to be declining. • Majority of waste is still being disposed of to landfill but amount of waste landfilled appears to be declining. • Limited landfill capacity within Somerset. According to 2001 data this is expected to run out 3-4 years after the end of the current Somerset Waste Local Plan period in 2011. No new data to confirm whether this is still the case. • County Council are concerned that relatively few new recycling or treatment facilities have been granted consent. • Significant proportion of hazardous waste in Somerset is exported. 	<ul style="list-style-type: none"> • It seems that recycling rates have reached a maximum in WS and may not increase significantly in the future from the current relatively high level. • Total household waste may continue to fall. However, there are so many factors influencing the amount of waste produced that this is uncertain. • Total waste being landfilled may also continue to fall, especially if other strategic waste management facilities are bought on line. However, this is highly uncertain and dependent on the County Council's future waste strategy and industry action. The worst case scenario is that landfills in Somerset are full by 2015 and waste needs to be exported to other areas for disposal. • In terms of future long term waste management in WS, it is likely that waste from the district will be managed at a (currently unidentified) site between Bridgwater and Taunton. • It is likely that a significant proportion of hazardous waste will continue to be exported for disposal.
8. Water	
<ul style="list-style-type: none"> • Most of the WS streams do not meet Good Ecological Status (GES) and as such action will be required to ensure GES is met by 2015. • Two Coastal Change Management Areas have been defined in the plan area and development within them will be limited to temporary, tourism related development. No development will be permitted within parts of the Coastal Change Management Areas which are vulnerable to rapid coastal erosion. 	<ul style="list-style-type: none"> • It is not clear how successful the actions will be in ensuring WS streams meet Good Ecological Status (GES). • It is not clear how successful the actions will be in ensuring Blue Anchor Beach meets Bathing Water Quality Standards. • Leakage rates are decreasing and with actions planned by Wessex Water should continue to decrease.

Table NTS 3.1: Sustainability baseline summary	
Sustainability baseline / issues / characteristics of the area	Evolution without the plan
<ul style="list-style-type: none"> • Bathing water is of good quality apart from at Blue Anchor beach. • Water efficiency (measured through water leakage) is increasing. • Two main areas at risk from fluvial flooding in WS: Williton and Minehead. Flooding may become more common with the effects of climate change. Planning system needs to deal with adaptation to flooding effects. • Horner Water and Washford Stream may have water resource issues in time of low flow. 	<ul style="list-style-type: none"> • Wessex Water predicts that there are adequate water resources available in the WS area. However, this does not decrease the importance of using water sustainably as new development and climate change will put increasing pressure on water resources. This is especially the case as Horner Water and Washford Stream may have resource issues in time of low flow. • Without actions and policies within the Local Plan, flooding of development sites is likely to increase.
9. Cultural heritage	
<ul style="list-style-type: none"> • Loss of historic patterns of development, plots and boundaries (historic grain). • Demolition of unlisted buildings and structures of local historic or architectural merit. • Standardisation and cluttering of the public realm and restrictions on the creation of good quality new external spaces. • Mixed quality of architectural design and sensitivity to the historic environment for new developments including lack of good boundary treatment for new developments. • Loss of local architectural distinctiveness with the diminished use and reference to traditional local materials and architectural detailing. Loss of historic architectural features. • Erosion of registered and non-registered historic parks and gardens. • Increasing need to preserve the known and unknown archaeological baseline of the area. Preservation of buried archaeological sites, conservation areas and registered landscapes conflicts with requirements for a larger stock of good affordable housing. 	<ul style="list-style-type: none"> • With the UKs high density of historic buildings and archaeology there is always a potential conflict between further development and the potential changes in character of areas and the degradation or destruction of sites or buildings of historic importance. • Requirements for developers to undertake archaeological surveys and if necessary undertake archaeological monitoring and investigations means that archaeology should be discovered recorded.

Table NTS 3.1: Sustainability baseline summary	
Sustainability baseline / issues / characteristics of the area	Evolution without the plan
10. Human health	
<ul style="list-style-type: none"> • WS has an ageing population. Will be exacerbated in future by a low total fertility rate and an increasing life expectancy. • Limiting long term illness in WS is greater than the regional and national averages. • The impact of large seasonal influxes of people during the summer months can double the local population in the area, putting pressure on services. • In Somerset 34.7% of adults are overweight and 13.5% are obese. 	<ul style="list-style-type: none"> • Ageing population will put further pressure on health services. • Percentage of people who are obese in Somerset is increasing but the amount of people taking regular exercise is also increasing. • Levels of ill health likely to remain stable or even increase. However, life expectancy is expected to increase and this might have implications on housing demand and demand for different types / tenure of housing. • WS will remain popular with visitors and the pressure on services during the tourism season will remain.
11. Landscape	
<ul style="list-style-type: none"> • Major development of land outside the boundaries of designated areas can have a visual impact on views and lead to light pollution. • Quantock Hills has identified visual impacts within the AONB as a key threat to the landscape through the construction of pylons, masts and wind turbines. • New development not always consistent with character of the area and the local building style. • The plan will need to develop a joined-up approach to green spaces and habitat networks. • Defined Character Areas have undergone changes not consistent with their character. Main cause of change is more intensive land management practices, leading to loss of hedgerows, woodlands and orchards, and increased field size. • Somerset has a low percentage of woodland cover, below the national county average. 	<ul style="list-style-type: none"> • There are many changes to the landscape that, without the protection of the policies in the Local Plan, will continue to worsen.

Table NTS 3.1: Sustainability baseline summary	
Sustainability baseline / issues / characteristics of the area	Evolution without the plan
12. Labour market, economy and regeneration	
<ul style="list-style-type: none"> • WS faces significant challenges to its economic development such as an ageing population and its location in relation to large economic centres. • WS has a lower proportion of people employed in high-skill high-wage occupations and a higher proportion of people employed in low-skill low-wage occupations. • WS experiences considerable differences in employment levels depending on the seasons. There is a high proportion of self-employed people. • WS has a lower proportion of people with NVQ4 level skills than in neighbouring districts. • Average earnings are lower than in the South West and the UK as a whole. • However, the employment rate is higher than either the regional or national averages. • Young people aged 24 and under make up a very large number of all job seeker allowance claimants. This is also a national trend. • WS has a higher percentage of people working from home compared to Somerset and England. • There is a lack of available employment land/workspace, industrial and commercial properties. • The number of businesses in the WS has increased gradually over the last ten years. 	<ul style="list-style-type: none"> • The district will continue to be relatively disconnected from large economic centres and the population will continue to age making regeneration more of a challenge than in other areas. • Without action taken in the Local Plan skill levels and employment opportunity will remain a challenge • The seasonal nature of employment in the district is likely to remain.
13. Biodiversity	
<ul style="list-style-type: none"> • Large number of sites designated for ecological value which require 	<ul style="list-style-type: none"> • Due to lack of monitoring in WS it is difficult to identify trends in habitats or

Table NTS 3.1: Sustainability baseline summary	
Sustainability baseline / issues / characteristics of the area	Evolution without the plan
<p>protection.</p> <ul style="list-style-type: none"> • Effects on sites which cross administrative boundaries, such as on Exmoor National Park, are likely to be important (e.g. increased housing in WS may cause increased recreational pressure in Exmoor). • Some of the nature conservation sites in WS are in an ‘unfavourable’ condition. However, this is mostly due to inappropriate management although it may also be due, in part, to recreational and tourist pressures on sites. • The majority of habitats have declined significantly in Somerset as a whole. • Many important species are found in the wider countryside, not just in designated sites for nature conservation. • Monitoring in Somerset has not been sufficient to determine recent trends and therefore a precautionary approach must be taken to development. • The ecosystem approach should be used in planning in order to consider biodiversity as a whole, not just the 'islands' of designated sites that are scattered across the county. The value of habitats not designated and habitat networks needs consideration and protection. 	<p>species.</p> <ul style="list-style-type: none"> • The majority of Somerset’s habitats declined significantly in size in the last decades of the 20th century and without action in the Local Plan this is likely to worsen. • Hundreds of species are known to be declining in numbers in the UK and without action in the Local Plan this is likely to worsen. • Somerset has a high proportion of European level protected species and national/local Biodiversity Action Plan species and a particular responsibility to conserve biodiversity (the number and variety of species within an area). Local trends are expected to be worsening but strategies being developed now aim to reverse the trend. It is uncertain how successful these are likely to be. • Climate change is likely to have effects on a number of habitats and species in the future. This ranges from coastal flooding affecting marine habitats to lowering water levels affecting habitats.

4 How the Assessment was Undertaken

4.1 Introduction

The purpose of the SA is to assess the social, environmental and economic effects of the plan. Two decisions need to be made when deciding how to assess the plan:

- What questions should be used to guide the SA?
- How should the appraisal be carried out?

4.2 Questions used to guide the SA

A review has been undertaken of the baseline environmental, social and economic conditions of the plan area and the important objectives that the plan should be helping to achieve. This information has then been used to develop what is called a SA framework. To carry out the assessment the Local Plan is compared against the different elements of the SA framework and effects identified. The SA framework is shown in Table 4.1.

Table NTS 4.1: SA Framework
SA objective
1. Air and noise
1a. Reduce impacts on tranquility from noise and visual intrusion.
1b. Reduce the need to travel and facilitate modal shift (particularly with regard to reducing the impact of traffic during the peak summer months).
2. Climate and energy
2a. Reduce greenhouse gas emissions
2b. Improve adaptation for unavoidable climate change including consideration of the location of development.
2c. Increase energy efficiency and the amount of energy generated from renewable sources.
3. Crime
3a. Reduce anti-social behaviour and fear of crime.
4. Public infrastructure
4a. Ensure equitable access to viable facilities and services for all sectors of the community including those in rural areas.
5. Population and social inclusion
5a. To develop and maintain a balanced and sustainable population structure which good access to services, facilities and homes for all sectors of the society
6. Soils and geology
6a. Reduce land contamination, and safeguard soil and geological quality and quantity.
7. Waste
7a. To reduce waste generation and disposal, increase recycling and achieve the sustainable management of waste

Table NTS 4.1: SA Framework
SA objective
8. Water
8a. Maintain and improve the quality of ground/river/coastal water.
8b. Reduce risk of flooding including coastal flooding.
8c. Improve efficiency of water use.
9. Cultural heritage
9a. Protect the fabric and setting of designated and undesignated archaeological sites, monuments, structures and buildings, recorded Historic Parks and gardens, maritime and coastal heritage, listed buildings and conservation areas.
10. Human health
10a. To improve the health and wellbeing of the population and improve access to health services for all.
11. Landscape
11a. Ensure that special and distinctive landscapes, and the features within them, are conserved and enhanced.
11b. Enhance the form and design of the built environment.
11c. Ensure provision is made to incorporate green infrastructure into spatial planning.
12. Labour market, economy and regeneration
12a. Improve sustainable economic activity within West Somerset enabling regeneration of key areas.
13. Biodiversity
13a. Protect and enhance biodiversity at all levels.
13b. Maintain, restore and enhance populations of focal species.
13c. Increase the land area of UK Biodiversity Action Plan habitats within the district.
13d. Maintain and improve the conservation status of selected designated and non-designated nature conservation sites.

4.3 How the assessment was carried out

The plan has been assessed using tables (called SA matrices) which help the SA team to compare different elements of the plan against the SA framework. A combination of expert judgement and analysis of baseline data has been used to judge the potential effects of the plan. Once an effect has been identified, this is then scored according to how significant the effect could be. Table 4.2 outlines how these scores are defined.

Table NTS 4.2: SA scoring		
Score	Description	Symbol
Significant positive impact	The option strongly supports the achievement of the SA Objective and has a major positive effect with relation to characteristics of the effect and the sensitivity of the	++

Table NTS 4.2: SA scoring		
Score	Description	Symbol
	receptors	
Minor positive impact	The option generally support the achievement of the SA Objective and has a minor positive effect with relation to characteristics of the effect and the sensitivity of the receptors	+
Neutral	The option does not have an effect on the achievement of the SA Objective	0
Minor negative impact	The option conflicts with the achievement of the SA Objective and has a negative effect with relation to characteristics of the effect and the sensitivity of the receptors	-
Significant negative impact	The option conflicts with the SA Objective and has a negative effect with relation to characteristics of the effect and the sensitivity of the receptors. In addition the future baseline indicates a worsening trend in the absence of intervention	--
Uncertain	It is unclear whether there is the potential for a negative or positive effect on the SA Objective	?

The SA has been carried out at each stage of plan making in order to guide the development of the plan and ensure that the sustainability effects of the plan have been taken into account at all stages.

5 Results of the SA

5.1 Assessing alternative options

As well as assessing the effects of the Local Plan at this stage, assessments have been undertaken of alternative ways of planning for development in West Somerset. This work has been undertaken throughout the development of the Local Plan as the plan authors developed alternative strategy options.

Table 5.1 sets out the reasons for selecting the alternatives dealt with and also outlines the results of the assessments of the alternatives.

5.2 Results of the SA

Table 5.2 is a summary of the significant and uncertain effects of the Local Plan as identified in the SA. The full results are available within the SA report which provides more detail. Mitigation measures are measures suggested to prevent, reduce or offset negative or uncertain effects. Enhancement measures are measures that can enhance any positive or neutral effects identified. Some of the mitigation measures outlined in the SA are summarised below:

- The vision and spatial objectives could be strengthened through the addition of several different issues including reference to avoiding noise pollution, increasing energy

efficiency and generation and use of renewable energy, improving water quality and enhancing green infrastructure provision;

- Information is needed in relation to the criteria that development will be judged against in deeming it sustainable. The definition of sustainability in the plan is useful but is not enough of a check to ensure that the sustainability of the District is protected from inappropriate development. Some sustainability criteria are addressed by various Local Plan Policies. However, there may be instances where an aspect of sustainability is not addressed by a Local Plan Policy. The SA recommends that that as a minimum the headline issues that the council would expect to see within any planning application should be listed. In addition, some more detailed guidance could be provided by the council which references the appropriate standards and targets which developments should be reaching/aspiring to;
- Policies EN1 and EN2 would be strengthened if more detailed references were made to ensuring local employment and maximising local skills;
- A full air and noise assessment and transport implications assessment should be carried out before development of renewable energy systems (or other systems that involve the delivery of fuel) goes ahead. This should be specified in the plan;
- Before a site is allocated as a gypsy or traveller site an assessment should be carried out on the environmental and social impacts likely to arise from the site in comparison to other available sites. Adequate waste management facilities should be put in place. This should be specified in the plan;
- Policy ID1 should be more specific in addressing the provision of public transport, cycling and walking where appropriate; and
- For development in the strategic development areas and employment sites several mitigation measures will be needed before development goes ahead including measures to reduce noise, provide ecological assessments, measures to improve drainage and reduce the risk of flooding, the provision of adequate community services, improvement of public transport and landscape appraisals (especially for development in areas of Minehead that may bring development closer to Exmoor National Park).

5.3 Cumulative effects assessment

Regulations governing SA require an assessment of cumulative effects. Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where the effects of different elements of the plan will have a combined effect.

A separate cumulative effects assessment has been undertaken following the assessment of the individual policies. The cumulative effects assessment has considered how the different aspects of the plan could cause cumulative effects. The assessment has also considered how the effects of other projects, plans and programmes could combine with the effects of the Local Plan. The results of the cumulative effects assessment were as follows:

- In terms of the effects in combination with other plans and pending development projects, the assessment addressed the Somerset Future Transport Plan, the Hinkley Point Nuclear Power Station development, Somerset Waste and Mineral Local

Development Frameworks and the redevelopment of the East Wharf at Watchet. The assessment found no cumulative effects in association with these other plans / projects;

- In terms of the cumulative effects of the different aspects of the Local Plan the assessment found that the sites in the Minehead area could have a significant negative effect on landscape and flooding and a significant positive effect in relation to reducing the need to travel, greenhouse gas emissions and increasing the resources available for coastal protection. Mitigation measures were suggested to offset the significant negative effects; and
- In terms of the cumulative effects of the sites in in Williton / Watchet the assessment identified a significant negative effect on flooding and a significant positive effect in relation to reducing the need to travel and greenhouse gas emissions. Mitigation measures were suggested to offset the significant negative effect.

5.4 The HRA does not identify any significant potential in-combination or cumulative effects. Difficulties encountered in the SA

One of the main difficulties encountered in the assessment is the uncertainty over whether an effect is likely to happen or not. Regulations governing SA state that effects assessment should include assessment of secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects. At this high level, however, it is often not possible to tell (especially with a general policy) what the definite effects are likely to be. However, where information is available this has been included in the assessment.

Table NTS 5.1: Assessment of alternatives		
Element of the plan and options tested	Reason for selecting the alternatives tested	Results of the SA
1. Spatial vision and strategic objectives for the district	<p>A combination of historic patterns of development, accessibility and, the designation of Local Planning Authority boundaries constrained the number and type of options available.</p> <p>West Somerset Council identified six different potential alternatives through the Options stage consultation.</p> <p>Although three were discounted for reasons of potentially encouraging unsustainable patterns of activity they were not excluded outright, in order to permit a case in any of their favours from being made through the consultation process.</p> <p>Consideration was also made of the role and function of settlements, development proposals, and their accessibility, outside of the LPA area and the influence they are likely to have on those living and working within it.</p> <p>Due to the emerging proposal to build a new nuclear power station at nearby Hinkley Point¹ and the consequences this might have during the c.10 year construction period, it was considered that the village of Stogursey could be developed as a higher order centre in the local settlement hierarchy and this was considered as part of the Options consultation process² (see: 2. Strategy Options, below).</p> <p>Ultimately, the three selected options comprised variations of a common theme and not dissimilar to that which had occurred in the recent past. The primary focus for the bulk of future development would be directed towards the three largest settlements in West Somerset of, Minehead, Watchet and</p>	<p>The spatial vision generally performs well against the SA objectives. The vision performs particularly well in relation to reducing the need to travel, encouraging and maintaining a balanced population structure and protecting and enhancing biodiversity. The vision has a neutral performance with regard to ensuring equitable access to facilities and services for all sectors of the community and incorporating green infrastructure into spatial planning. However, it makes no provision for reducing crime and fear of crime, reducing land contamination and protecting soil resources, reducing waste and promoting recycling, improving the health and well-being of the population, improving water quality and protecting cultural heritage and landscape. Therefore, its potential impact on these areas is currently uncertain.</p> <p>The strategic objectives also perform well against the SA objectives. The objectives perform particularly well in relation to protecting cultural heritage, conserving and enhancing landscape and protecting and enhancing biodiversity. The objectives have a neutral performance with regard to reducing anti-social behaviour and fear of crime. However, they make no provision for reducing noise and visual intrusion, improving public infrastructure, reducing land contamination and protecting soil resources, reducing waste and promoting recycling, improving the health and well-being of the population, improving water quality and incorporating green infrastructure into spatial planning.</p>

¹ NNB Generation Co. Ltd.; [Hinkley Point C Proposed Nuclear Development: Development Consent Order Application – October 2011](#); EDF Energy; 2011.

² West Somerset Council; [West Somerset Core Strategy Options Paper – January 2010](#); West Somerset Council; 2010.

Table NTS 5.1: Assessment of alternatives		
Element of the plan and options tested	Reason for selecting the alternatives tested	Results of the SA
	<p>Williton with different potential supporting locations.</p> <p>The Options consultation supported this general approach with the greatest support being expressed for a continuation of the existing strategy of focusing on the three largest settlements outside of the Exmoor National Park.</p>	
<p>2. Strategy Options</p> <p>Strategy option 1: Concentrate new development at three main settlements;</p> <p>Strategy option 2: Concentrate new development at four main settlements – including the upgrading of Stogursey to a ‘Policy C’ (or Local Service centre) settlement; and</p> <p>Strategy option 3: Dispersal of development including allocations at the larger villages.</p>	<p>Option 1</p> <p>This is a continuation of the existing strategy contained in the West Somerset District Local Plan (1991 – 2011),³ which focuses the majority of new development on the three largest settlements (Minehead, Watchet and, Williton) in the LPA area.</p> <p>Monitoring of residential development over the period 1991 – 2009⁴ shows that c.80% of this has occurred in these three settlements.</p> <p>The results of the Options stage consultation indicated a clearer preference for this strategy rather than the other two.</p> <p>Option 2</p> <p>This option sought to create a fourth main focus for future development at the village of Stogursey.</p> <p>This village was one of the larger ones in the LPA area with a range of extant services and facilities serving the local community. Due to the emerging proposal to build a new nuclear power station at nearby Hinkley Point⁵ and the</p>	<p>Strategy Option 1 focuses on strengthening the local economy of Minehead and promoting Watchet and Williton as important local centres, which is where around half of the population of West Somerset is based. As such, it performs well in terms of reducing the need to travel, reducing anti-social behaviour and fear of crime and improving sustainable economic activity within West Somerset. It also makes provision for SUDS measures and green infrastructure to be included in all new development. However, its performance in relation to many of the SA objectives is uncertain as it does not make provision for reducing greenhouse gas emissions, adapting to climate change, encouraging energy efficiency and renewable energy generation, reducing land contamination, reducing waste generation and promoting recycling, improving water quality, protecting cultural heritage assets, protecting biodiversity and nature conservation sites and conserving and enhancing landscape features.</p> <p>Strategy Option 2 focuses on strengthening the local economy of Minehead and promoting Watchet, Williton and Stogursey as important local centres, the latter centre assisting with the predicted increase in traffic caused by the proposed Hinkley Point nuclear power station expansion. As such, it performs well in terms of reducing noise and visual intrusion, reducing the need to travel, reducing anti-social behaviour and fear of crime and improving sustainable economic activity within West</p>

³ West Somerset District Council; [West Somerset District Local Plan – Adopted, April 2006](#); West Somerset Council; 2008

⁴ West Somerset Council; [West Somerset Annual Monitoring Report 2008/9 – December 2009](#); West Somerset Council; 2009

⁵ NNB Generation Co. Ltd.; [Hinkley Point C Proposed Nuclear Development: Development Consent Order Application – October 2011](#); op.cit.

Table NTS 5.1: Assessment of alternatives		
Element of the plan and options tested	Reason for selecting the alternatives tested	Results of the SA
	<p>consequences this might have during the c.10 year construction period, it was considered that the village could be developed as a higher order centre in the local settlement hierarchy.</p> <p>The results of the Options stage consultation showed that this alternative was not enthusiastically supported, especially by the local residents of Stogursey. They pointed out that in order for the village to fulfil its role as a local service centre similar to that of Watchet and Williton, a substantial level of improvement in the local infrastructure, particularly the road network would be required and this was unlikely to be provided.</p> <p>Option 3</p> <p>This recognised the role and function performed by the larger villages within the LPA area to their local communities in terms of the limited range of services and facilities they provided.</p> <p>It sought to include them as part of the potential locations for development but this to be regulated so that it would be linked to their existing size, role and, function.</p> <p>Although this option could also be described as a continuation of the current strategy, opinion amongst the residents of the larger villages affected was divided as to whether this would be of benefit to their communities or not. There appeared to be no clear collective preference either way.</p>	<p>Somerset. It also makes provision for SUDS measures and green infrastructure to be included in all new development. However, its performance in relation to many of the SA objectives is uncertain as it also does not make provision for reducing greenhouse gas emissions, adapting to climate change, encouraging energy efficiency and renewable energy generation, reducing land contamination, reducing waste generation and promoting recycling, improving water quality, protecting cultural heritage assets, protecting biodiversity and nature conservation sites and conserving and enhancing landscape features.</p> <p>Strategy Option 3 focuses on strengthening the local economy of Minehead, promoting Watchet, Williton and Stogursey as important local centres and promoting new development in other larger villages across West Somerset. As such, it performs well in terms of ensuring equitable access to viable facilities and services for all sectors of the community (including those in rural areas), developing and maintaining a balanced and sustainable population structure, improving access to health services for all and improving sustainable economic activity within West Somerset. It also makes provision for SUDS measures and green infrastructure to be included in all new development. However, its performance in relation to many of the SA objectives is uncertain as it may increase the need to travel and it does not make provision for reducing greenhouse gas emissions, adapting to climate change, encouraging energy efficiency, reducing land contamination, reducing waste generation and promoting recycling, improving water quality, protecting cultural heritage assets, protecting biodiversity and nature conservation sites and conserving and enhancing landscape features.</p>
3. Excluded Options ⁶	Excluded Option 1	Excluded Option 1 proposes to disperse the proposed new development

⁶ In an appendix (Appendix 1) of the issues and options paper the Council also set out three excluded options. These options have been excluded because the Council consider that they would clearly fail to satisfy the relevant sustainability objectives. In order to check that conclusion is correct these options were tested by the SA team.

Table NTS 5.1: Assessment of alternatives		
Element of the plan and options tested	Reason for selecting the alternatives tested	Results of the SA
<p>Excluded option 1: A strategy involving less development at the larger settlements and a much wider degree of dispersal of development including the smaller settlements (including those with few or no facilities);</p> <p>Excluded option 2: A strategy involving no significant development at Minehead, with substantial development being focused elsewhere in the District closer to the M5 corridor; and</p> <p>Excluded option 3: A strategy involving the concentration of the bulk of the RSS requirement of 2,500 dwellings in a single eco-village / new settlement.</p>	<p>This was a variation on Option 3 above which sought to include some of the smaller villages as potential locations for future development.</p> <p>The potential scale of dispersal, the level of accessibility in terms of the extant transport infrastructure and, the limited extent of services and facilities within these smaller villages, were considered to be potential generators of patterns of future development and activity that were contrary to the principals of sustainable development, especially in the case of reducing the levels of reliance and use of the private car.</p> <p>Dispersing the focus of development away from the three largest settlements, which are concentrated in a relatively remote part of the LPA area on the coast could lead to their individual and collective vitality and viability being diminished in the longer-term.</p> <p>A less sustainable variation of the existing strategy and that proposed in Options 1 and 3. It did not receive much support through the options consultation process.</p> <p>Excluded Option 2</p> <p>This strategy sought to focus the majority of future development in those settlements within the LPA area that were closest to the 'M5 corridor'.</p> <p>This would have resulted in future development being focused on small and large villages that were poorly located in relation to the main extant transport (road) network and with limited facilities relative to their future size to service these populations.</p>	<p>across West Somerset, with less development in the larger settlements and some within the smaller settlements, including those with few or no facilities. As a result, it performs badly in terms of reducing the need to travel and reducing greenhouse gas emissions. It is also likely to involve development on greenfield, undeveloped land and, therefore, will not contribute to reducing land contamination, safeguarding soil resources, protecting biodiversity or increasing recycling provision. It also may have a negative impact on landscape features and it is unlikely to promote or encourage sustainable economic activity in West Somerset. If designed well, it may help to raise the standard of design in West Somerset, and it may be able to incorporate efficiency measures for water and energy use. However, this is unclear at this stage.</p> <p>Excluded Option 2 proposes no new development at Minehead and substantial new development in the east of the District, in proximity to the M5 corridor. As such, it performs particularly badly in terms of improving sustainable economic activity in West Somerset, reducing the need to travel and reducing noise and visual intrusion. It is also likely to involve development on greenfield, undeveloped land and, therefore, will not contribute to reducing land contamination, safeguarding soil resources, protecting biodiversity or increasing recycling provision. It is also unlikely to improve access to health services and ensure viable access to services and facilities for all. It is uncertain whether the new development would include climate change adaptation measures or increase efficiencies in water or energy use.</p> <p>Excluded Option 3 proposes to concentrate the new development to create a new settlement or eco-town, of approximately 2,500 dwellings. However, this would not be large enough to support new service provision or to be a self-contained settlement. Therefore, this option performs badly in terms of improving sustainable economic activity within West Somerset and enabling regeneration of key areas, reducing the need to travel, ensuring viable access to services and facilities and improving access to</p>

Table NTS 5.1: Assessment of alternatives		
Element of the plan and options tested	Reason for selecting the alternatives tested	Results of the SA
	<p>Given their proximity to larger settlements outside of the LPA area (Taunton and Bridgwater), it is unlikely that the affected villages would benefit from a significant increase in services and facilities and would effectively become 'dormitory' settlements.</p> <p>Dispersing the focus of development away from the three largest settlements, which are concentrated in a relatively remote part of the LPA area on the coast could lead to their individual and collective vitality and viability being diminished in the longer-term.</p> <p>This option attracted little support from the residents of the settlements that were most likely to be affected. The few representations that were in favour of this option originated from settlements furthest from the 'M5 corridor'.</p> <p>Excluded Option 3</p> <p>This was to create a new settlement within the LPA area which would have strong 'eco-credentials'.</p> <p>Whilst superficially attractive from a sustainability perspective, the proposed scale of development (2,500 dwellings and associated infrastructure/ development) would be insufficient to create a self-contained and /or viable settlement within the 20 year life-span of the plan.</p> <p>The options in terms of potential locations were restricted by the poor road network throughout the LPA area and the implications of the volume of traffic that could be generated by the development on this network, where-ever it was located.</p> <p>There was little enthusiasm shown in support of this possible</p>	<p>health services. It is also likely to involve development on greenfield, undeveloped land and, therefore, will not contribute to conserving and enhancing landscape features, reducing land contamination, safeguarding soil resources, protecting biodiversity or increasing recycling provision. If designed well, it may raise the standard of design in West Somerset, and it is also likely to help reduce greenhouse gas emissions and increase energy efficiency and water use.</p>

Table NTS 5.1: Assessment of alternatives		
Element of the plan and options tested	Reason for selecting the alternatives tested	Results of the SA
	option for future development within the District (outside of the National Park) through the Options consultation process.	
<p>4. Key Themes⁷</p> <p>Theme 6.1 Settlement Policy - Settlement Role and function hierarchy</p>	<p>Whilst West Somerset does not contain any large settlements compared to its neighbours (e.g . Barnstaple, Bridgwater and, Taunton), it does have complex and fine-grained settlement hierarchy.</p> <p>The role and function of many of these settlements are determined by their proximity and/or accessibility to their neighbours</p> <p>The relative remoteness of the area and the proximity to larger service centres outside of the LPA area contribute to high levels of self-containment in terms of living and working especially in the northern coastal strip.</p> <p>The responses to the Options consultation process showed an acknowledgement of the existing situation in terms of the role and function of settlements and that this was unlikely to change in the future.</p>	<p>The policy options for Settlement Policy are not mutually exclusive. They could all result in positive effects with regards to the relevant SA Objective and should all be included in the Core Strategy.</p> <p>The options for the overarching spatial development strategy set out in Section 5 have been appraised separately and recommendations have been put forward in relation to the Spatial Development Strategy within Matrix 1 (see above).</p> <p>The types of infrastructure required to support development (or the types of infrastructure for which contributions will be sought) will need to be set out within the Core Strategy.</p>
Theme 6.2 Transport - Making West Somerset's communities more self contained	The strategy and policies acknowledge the limited opportunities for developing alternative and more sustainable transport options and solutions to and throughout the area, particularly in relation to the road network. There is a need to maintain and enhance the existing infrastructure and services and direct development to those locations where it can do this, improve accessibility to services and facilities and/or, make other, more	<p>Policy options 'd' and 'e' involve investigating additional uses of the West Somerset Railway for freight and passenger commuter services. The investigations would need to consider noise, vibration and tranquillity impacts on sensitive receptors and whether the additional uses of the railway could impact on tourism use.</p> <p>Policy option 'g' proposes a relief road on the edges of Williton which could</p>

⁷ Section 6 of the Options Paper sets out key themes for the other matters that the plan will need to address and discusses 'options' for the types of policies that the plan could contain to deal with the themes. There are 8 themes (settlement role and function hierarchy, transport, housing, climate change, economy, biodiversity, heritage and other key issues (emerging Hinkley Point Nuclear Power Station proposal)) and each has a range of policy option suggestions (2-10 options). Please note that some of the options were not mutually exclusive and some of the policy options were one line in length and were not fully developed.

Table NTS 5.1: Assessment of alternatives		
Element of the plan and options tested	Reason for selecting the alternatives tested	Results of the SA
	<p>marginal transport services, more viable.</p> <p>The Future Transport Plan (FTP) for Somerset⁸ illustrates the absence of a strategic transport imperative within West Somerset compared with larger settlements (e.g. Bridgwater, Taunton and, Yeovil) outside of the LPA area. This means that there will be no substantive investment in the transport infrastructure throughout the District in the future and that which is provided will need to be funded via development. Therefore, there is a need to ensure that future development occurs in locations and settlements where the sustainable transport benefits can be maximised and reduce dependency and use of the private car as the primary means of accessing services and facilities within the area.</p>	<p>result in a number of potential negative environmental effects. Such a development would require an Environmental Impact Assessment (EIA) and core policy wording could suggest the issues that would need to be addressed within the EIA.</p> <p>Policy option 'b' should be amended to require all developments to maximise walking and cycling through the design of the development and/or through contributions as appropriate.</p> <p>The options do not address the need to improve access to rural communities by public transport. The options could also make the connection between creating a network of cycling and walking routes serving the main settlements of the district and, at the same time, enhancing the green infrastructure network. Longer distance footpaths and cycleways between settlements could also encourage walking and cycling amongst tourists and these should also be encouraged within the Core Policies in association with the Local Transport Plan.</p>
<p>Theme 6.3 Housing - Meeting the communities' needs for housing by providing better access and availability of housing that fits the diverse needs of people</p>	<p>Monitoring of residential development over the period 1991 – 2009⁹ shows that c.80% of this has occurred in the three main settlements of Minehead, Watchet and, Williton. These are the settlements that provide the greatest range of services and facilities to the local population and the scale of past growth at these locations contributes towards maintaining sustainable patterns of living and enhancing their respective role and function.</p> <p>The scale of development that has been achieved in the LPA area over the period 1991 – 2009 is consistent with that identified/ projected through higher level development plan</p>	<p>The following have been omitted and these should be addressed within the core policies:</p> <ul style="list-style-type: none"> • The potential for housing to contribute to identified regeneration; • The location of housing with regard to flood risk and other environmental sensitivities; • Provision for gypsies and travellers; • Encouraging the reuse of brownfield sites before the development of Greenfield sites; and

⁸ Somerset County Council; [Somerset County Council Future Transport Plan: Transport Policies – Schedule of Policies](#); Somerset County Council; 2011.

⁹ West Somerset Council; [West Somerset Annual Monitoring Report 2008/9 – December 2009](#); op. cit.

Table NTS 5.1: Assessment of alternatives		
Element of the plan and options tested	Reason for selecting the alternatives tested	Results of the SA
	documents (e.g. Somerset and Exmoor National Park Joint Structure Plan Review ¹⁰) for the same period.	<ul style="list-style-type: none"> Although the policy options include option 'g' ensuring high quality design, this should be expanded to include sustainable design, safety, complementing and/or enhancing the surrounding built environment, including historic areas and buildings and design standards. <p>Most of the policy options would result in positive effects although it is identified that policy option 'f' could result in negative environmental effects. It is recommended that justification for the inclusion of option 'f' is needed and explanation is needed as to why an options of adjusting the settlement boundaries of some villages has not been proposed.</p>
Theme 6.4 Climate Change - Mitigating the effects of climate change	<p>The options selected recognised the existing position of the various settlements, their respective role and function to their own and surrounding communities and, their potential to maximise the ability to mitigate against the threats posed by climate change in the future through possible development.</p> <p>WSC's Level 1¹¹ and Level 2¹² SFRA's have identified local issues in respect of flooding, now and in the future, for the main settlements, including taking account of the implications of climate change.</p> <p>The Shoreline Management Plan for the West Somerset element of the Bristol Channel¹³ has identified the areas most at risk from change in the future including taking account of the impact of climate change. These have been factored into the</p>	<p>All of the policy options proposed would result in positive effects with regards to the SA Objectives and they should all be considered for inclusion in the Core Policies. There are some potential negative effects but these may be mitigable and therefore it is considered that these are unlikely to give sufficient reason to reject a particular policy option. Core Policies will need to address the need to mitigate any potential negative effects associated with these proposed policy options. This theme should cover both contributions towards climate change and adaption to climate change. Policy option 'h' should be extended to ensure that new housing developments and tourism developments are within walking and cycling distance of basic services, such as a shop. A Core Policy which sets out sustainable construction and design requirements and which refers to recognised standards is recommended.</p>

¹⁰ Somerset County Council and Exmoor National Park Authority; [Somerset and Exmoor National Park Joint Structure Plan Review – Adopted, April 2000](#); Somerset County Council; 2001

¹¹ Scott Wilson; [West Somerset Council & Exmoor National Park Authority Strategic Flood Risk Assessment Level: Final Report – March 2009](#); West Somerset Council; 2009

¹² Scott Wilson; [West Somerset Council Level 2 Strategic Flood Risk Assessment: Final Report – October 2010](#); West Somerset Council; 2010.

¹³ Halcrow; [North Devon and Somerset Coastal Advisory Group \(NDSCAG\) Shoreline Management Plan Review \(SMP2\): Hartland Point to Anchor Head Draft Final SMP – June 2010](#); North Devon and Somerset Coastal Advisory Group; 2010

Table NTS 5.1: Assessment of alternatives		
Element of the plan and options tested	Reason for selecting the alternatives tested	Results of the SA
	process of identifying potential settlements for future development and potential future directions of growth around them at a strategic level.	
Theme 6.5 Economy - Strengthening and broadening the local economy	<p>WSC recognises the historic development of the local economy in relation to the distribution of the existing settlements and their respective role and function. It also recognises the limitations imposed on the growth and diversification within the local economy away from the low-paid employment which predominates the area (e.g. retail, agriculture, social-care and, tourism) caused by its relative remoteness and accessibility are a significant constraint.</p> <p>With the exception of the Hinkley Point proposal¹⁴ which is at the north-eastern extremity of the LPA area there is little prospect of new major employers locating in the area and associated large-scale inward investment. Consequently economic growth and development is expected to come from small-scale existing and future businesses employing on a micro scale (<5 employees). The high proportion of self-employment (c.30%)¹⁵ within the District reflects this. The policy emphasis in the emerging plan is aimed at providing and encouraging the establishment and development of these types of businesses utilising existing buildings and premises, including within residential units, in order to assist economic development in the most sustainable locations.</p>	<p>The policy options are not mutually exclusive and there would not appear to be any options which should not be taken forward for sustainability reasons. However, a clearer justification is needed for the proposed new jetty at Minehead and without this it is unclear what the specific benefits could be with relation to sustainability effects. The policy options proposed provide a good coverage and address most of the issues identified. A number of recommendations are made by the SA team as follows:</p> <p>There is no policy option which specifically supports retail provision within villages which is identified within the key issues and this should be addressed within the Core Policies.</p> <p>The Core Policies should ensure that economic development does not adversely affect the environmental quality, including biodiversity, historic environment and water quality of the district.</p> <p>If policy option 'c' is taken forward, policy wording will be needed to ensure that a balance is achieved between the economic viability of wood supply</p>
Theme 6.6 Biodiversity	The LPA area is directly and indirectly affected by the	Policy options 'a' and 'b' are similar and could be combined into one policy.

¹⁴ NNB Generation Co. Ltd.; [Hinkley Point C Proposed Nuclear Development: Development Consent Order Application – October 2011](#); op.cit.

¹⁵ EKOS; [West Somerset Economic Strategy: Delivering a New Equilibrium – April 2009](#); West Somerset Council; 2009

Table NTS 5.1: Assessment of alternatives		
Element of the plan and options tested	Reason for selecting the alternatives tested	Results of the SA
Protecting and enhancing biodiversity	designation of important international (e.g. SAC, Ramsar, etc.) and national (e.g. Exmoor National Park, ¹⁶ Quantock Hills AONB, ¹⁷ SSSI's, etc.) nature conservation value within and around it. These effectively limit the extent of land available for development free of such constraints. The location/ proximity to such designated areas provides strong evidence and reasons for securing protection and mitigation measures via development to maintain and enhance the natural environment network throughout the area and the biodiversity within it.	<p>The inclusion of developer contributions would help to secure biodiversity improvements through new developments. Policy option 'c' in particular would result in improvements to habitats within the district.</p> <p>There is no mention of focal species within the policy options and although these might benefit from the achievement of BAP objectives (policy option 'c') they are of local importance and should ideally be mentioned within the Core Policies. Specific core policy wording may be required in relation to the protection of European designated sites depending on the results of Habitats Regulations Assessment work on the Core Strategy which is being undertaken as the plan develops. Specific policy wording may be needed to avoid adverse effects on European designated sites.</p>
Theme 6.7 Heritage - Safeguarding and enhancing local distinctiveness	<p>WSC needs to balance protection of the historic built environment and associated assets against inhibiting economic investment as many of the identified buildings and properties are in prime commercial locations and there is limited opportunities to direct the latter elsewhere. The Local Plan recognises the close relationship of the historic built environment and the tourism industry and seeks to capitalise on those assets.</p> <p>Because of the wide range of properties, buildings and structures, both individually and collectively, throughout the LPA area and the different criteria that may need to be applied to each, the level of specificity required would be more suited to a separate, more detailed policy document.</p>	<p>This theme might be better expanded to include distinctiveness and landscape as well as heritage as the issues that are raised under this heading relate to local distinctiveness and landscape as well as heritage.</p> <p>The policy options could be expanded to include the need for new developments to reflect the local architectural vernacular, materials, scale and form in areas which are not conservation areas and the need for developments to reflect historic patterns of development such as plots and boundaries, where possible.</p> <p>Policy wording will be needed in order to ensure the protection and enhancement of all of the features mentioned in SA Objective 9a, in particular because archaeology and unknown archaeology are not addressed by the proposed policy options.</p> <p>It is recommended that any core policies which relate to the conservation</p>

¹⁶ Ministry of Housing and Local Government; National Parks and Access to the Countryside Act 1949: Exmoor National Park (Designation) Order 1954; Ministry of Housing and Local Government; 1954

¹⁷ Ministry of Housing and Local Government; National Parks and Access to the Countryside Act, 1949: The Quantock Hills Area of Outstanding Natural Beauty (Designation) Order, 1956; Ministry of Housing and Local Government; 1957.

Table NTS 5.1: Assessment of alternatives		
Element of the plan and options tested	Reason for selecting the alternatives tested	Results of the SA
		of historic buildings and conservation areas contain some flexibility to allow small scale renewable and energy efficiency improvements subject to visual impact and consultation with the Council's Conservation Officer.
Theme 6.8 Other important issues - Emerging Hinkley Point Nuclear Power Station Proposal	<p>The Local Plan needs to recognise that the decommissioning of existing and building new nuclear power plants at Hinkley Point will have a significant impact on the local environment, economy and social make-up of the area over a ten year period.</p> <p>It is acknowledged that the proposed structures involved will have a clear visual impact on the surrounding area but, the issues concerning Hinkley Point C will be determined by a separate process outside of the Local Plan and before any such policies come into effect.</p> <p>The policies included recognise that any subsequent development proposals associated with the proposal and existing structures that will be determined through the planning process can be subject to appropriate mitigation measures to minimise the direct and indirect impact on the surrounding area and communities.</p>	<p>The construction and operation of a new nuclear power station near to the existing Hinkley B installation will result in significant negative effects on the environment and the community. Such effects would relate to most of the environmental SA Objectives such as waste, water quality, air quality, traffic, noise and visual, soils and biodiversity. Community impacts could also relate to traffic and the impact on the health of residents particularly arising from perceived risk associated with proximity to such a facility. A new power station could also affect the image of the area and there is a particular risk with relation to the tourism industry. This could occur both during construction and operation. The site of the new power station will be on the coast and therefore sufficient flood risk assessment and mitigation for the lifetime of the facility will need to be required at the planning application stage.</p> <p>However, there is the potential for positive effects such as job creation during the construction and operational stages and the facility would generate low carbon electricity.</p> <p>Core policies will need to set requirements in order to minimise negative impacts to the district and to compensate for any impacts which cannot be mitigated.</p>

Table NTS 5.2: Effects of the Plan**Potential significant / uncertain effect identified****Effects on 1a. Reduce impacts on tranquility from noise and visual intrusion**

Uncertain effect of the strategic objectives as tranquillity is not addressed.

Table NTS 5.2: Effects of the Plan
Potential significant / uncertain effect identified
<p>Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.</p> <p>Uncertain effect of Policy SD6 due to uncertainty as to whether more industrial uses are included in policy.</p> <p>Uncertain effect of Policy EC2 (both sites) as the effect of the employment site on noise will be dependent on its location in relation to nearby residents.</p> <p>Uncertain effect of Policy CC1 as some renewable energy systems may have implications for air and noise pollution.</p> <p>Uncertain effect of Policy GT1 as the development of gypsy and traveller pitches could have a negative effect dependent on location.</p> <p>Significant positive effect of Policy NH1 as the policy will help to protect current and future residents against air and noise pollution.</p>
1b. Reduce the need to travel and facilitate modal shift
<p>Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.</p> <p>Significant negative effect of Policy WI2 (both sites) as the areas are more remote from the existing village centre making services difficult to access without a car.</p> <p>Uncertain effect of Policy CC1 as some renewable energy systems may have implications for road traffic.</p> <p>Uncertain effect of Policy ID1 as the policy is unclear whether it will encourage public transport, walking and cycling.</p>
2a. Reduce greenhouse gas emissions
<p>Significant negative effect of Policy WI2 (both sites) as the need to travel may increase.</p> <p>Uncertain effect of Policy ID1 as the policy is unclear whether it will encourage public transport, walking and cycling.</p>
2b. Improve adaptation for unavoidable climate change including consideration of the location of development
<p>Significant negative effect of many of the proposed development sites: Policy MD2 (NE of Seaward Way), Policy MD2 (Post 2022 West of Dunster Marsh), Policy EC2 (Mart Road, Minehead), Policy WI2 (East of the town), Policy WI2 (North of the town) as the site is in Flood Zone 3; and Policy EC2 (Roughmoor, Williton) as the sites are in areas at high risk of flooding.</p> <p>Significant positive effect of Policy CC2, Policy CC3 and Policy CC6 through encouraging location of development in areas that would not exacerbate flooding, be at risk from rapid coastal erosion and ensuring an assessment is carried out on the flood implications of new development.</p>
2c. Increase energy efficiency and the amount of energy generated from renewable sources
<p>Uncertain effect of the spatial vision and strategic objectives as they do not address energy efficiency and renewable energy.</p>

Table NTS 5.2: Effects of the Plan
Potential significant / uncertain effect identified
Uncertain effect of Policy OC1 as the policy is uncertain regarding what constitutes low impact development.
3a. Reduce anti-social behaviour and fear of crime
Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.
Uncertain effect of Policy GT1 as gypsy and traveller sites can increase the fear of crime and anti-social behaviour in local communities. Therefore, the effect of the policy could be negative dependent on where the pitches are located.
4a. Ensure equitable access to viable facilities and services for all sectors of the community including those in rural areas
Significant negative effect of Policy WI2 (East of the town and North of the town) as the areas are more remote from the existing village centre making services difficult to access without a car.
Significant positive effect of Policy ID1 in ensuring that new development provides a wide range of services to the community.
5a. To develop and maintain a balanced and sustainable population structure which good access to services, facilities and homes for all sectors of the society
Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.
Significant positive effect of Policy ID1 in ensuring that new development provides a wide range of services to the community.
6a. Reduce land contamination, and safeguard soil and geological quality and quantity
Uncertain effect of the spatial vision and the strategic objectives as they do not address contamination and safeguarding soil resources.
Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.
Uncertain effect of Policy MD2 (Post 2022 West of Dunster Marsh) as the site affects areas of Best and Most Versatile Agricultural land Grade 3a and 2.
Uncertain effect of Policy EC2 (both sites) as the exact boundaries of the sites are known.
Uncertain effect of Policy WA2 (South of the town) as the site affects areas of Best and Most Versatile Agricultural land Grade 3a and 2 and there is the possibility of fuel oil contamination on the site.
Uncertain effect of Policy WA2 (East of the town) as there is the possibility of fuel oil contamination on the site.
7a. To reduce waste generation and disposal, increase recycling and achieve the sustainable management of waste
Uncertain effect of the spatial vision and the strategic objectives in relation to this SA objective as there is no provision made for waste reduction and sustainable waste

Table NTS 5.2: Effects of the Plan
<p>Potential significant / uncertain effect identified</p> <p>management.</p> <p>Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.</p> <p>Uncertain effect of Policy OC1 as the policy specifies that development should be low impact. This could include measures to reduce waste although this is uncertain.</p> <p>Uncertain effect of Policy GT1 as the development of gypsy and traveller pitches can cause concerns about waste generation and management.</p>
<p>8a. Maintain and improve the quality of ground/river/coastal water</p> <p>Uncertain effect of the spatial vision and the strategic objectives in relation to this SA objective as there is no provision made for improving water quality.</p> <p>Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.</p>
<p>8b. Reduce risk of flooding including coastal flooding</p> <p>Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.</p> <p>Significant negative effect of Policy MD2 (NE of Seaward Way), Policy MD2 (Post 2022 West of Dunster Marsh), Policy EC2 (Mart Road, Minehead, Policy WA2 (South of the town), Policy WI2 (East of the town), Policy WI2 (North of the town) and Policy EC2 (Roughmoor, Williton) as the sites are in areas at risk of flooding or in low lying areas.</p> <p>Significant positive effect of Policy CC6 as the policy will help to ensure that areas at cumulative risk of flooding will only be permitted provided that suitable protection is given.</p>
<p>8c. Improve efficiency of water use</p> <p>Uncertain effect of the spatial vision and the strategic objectives as there is no provision made for improving the efficiency of water use.</p> <p>Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.</p> <p>Uncertain effect of Policy OC1 as the policy specifies that development should be low impact. This could include measures to reduce water use although this is uncertain.</p>
<p>9a. Protect the fabric and setting of designated and undesignated archaeological sites, monuments, structures and buildings, recorded Historic Parks and gardens, maritime and coastal heritage, listed buildings and conservation areas</p> <p>Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.</p> <p>Uncertain effect of Policy MD2 (all sites), WA2 (all sites) and WI2 (all sites) as the areas are predominantly greenfield which means that their full potential for significant heritage assets cannot adequately be assessed from existing records.</p> <p>Uncertain effect of Policy EC2 (all sites) as the exact boundaries are not yet known and it is unclear whether greenfield land will be affected by development.</p>

Table NTS 5.2: Effects of the Plan
Potential significant / uncertain effect identified
Significant positive effect of Policy NH1: The policy will have a significant positive effect in safeguarding and enhancing the district's cultural and built heritage.
10a. To improve the health and wellbeing of the population and improve access to health services for all
Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.
11a. Ensure that special and distinctive landscapes, and the features within them, are conserved and enhanced
Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.
Significant negative effect of Policy MD2 (South of A39) as the area is adjacent to the border of the Exmoor National Park, is of high landscape value and brings the town of Minehead and its development closer to the National Park, past the barrier of the A39.
Uncertain effect of Policy CC1 as some renewable energy systems may have implications for landscape.
Significant positive effect of Policy NH2 and NH4 as the policies will have a significant positive effect in safeguarding and enhancing non designated areas of landscape value.
11b. Enhance the form and design of the built environment
Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.
Uncertain effect of Policy CC1 as some renewable energy systems may have implications for the built environment.
Significant positive effect of Policy NH1 as the policy will help to safeguard and enhance the district's cultural and built heritage.
11c. Ensure provision is made to incorporate green infrastructure into spatial planning
Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.
Significant positive effect of Policy ID1 as the policy will help ensure that new development provides a wide range of services (including green infrastructure) to the community.
12a. Improve sustainable economic activity within West Somerset enabling regeneration of key areas
Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.
Uncertain effect of Hinkley Point and other major energy generating proposals on issues such as local skills.
Significant positive effect of Policy SC1 and SC2 as the policies promote the strengthening of the Minehead economy and also strengthen Watchet and Williton as important local centres.

Table NTS 5.2: Effects of the Plan
Potential significant / uncertain effect identified
<p>Significant positive effect of Policy EC2 (both sites) as the sites will be positive in increasing available workspace and access to opportunities in Minehead and Williton.</p> <p>Significant positive effect of Policy EC1, EC3, EC4, EC5, EC6, EC7, EC8, EC9, EC10 and EC11 as they encourage development that makes the local economy stronger and more diverse.</p>
13a. Protect and enhance biodiversity at all levels
<p>Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.</p> <p>Uncertain effect of Policy MD2 (NE of Seaward Way) as there is uncertainty whether the development would affect a reed pond, informal recreation area and nature reserve on the site.</p> <p>Uncertain effect of Policy MD2 (Post 2022 West of Dunster Marsh) as there is uncertainty whether the development would affect hedges and rhynes (drainage ditches) on the site.</p> <p>Uncertain effect of Policy EC2 (both sites) as there is a lack of information available on the likely extent of development.</p>
13b. Maintain, restore and enhance populations of focal species
<p>Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.</p> <p>The HRA has identified the following potential impacts with relation to Barbastelle Bats with relation to the Exmoor and Quantocks Oak Woodlands SAC:</p> <ul style="list-style-type: none"> • Loss of feeding habitat and severance of flight lines preventing access to feeding areas • Mortality from wind turbine development • Disturbance due to increased human activity around roosts as part of recreational activity generated by new residential housing and /or increased tourism (also to Bechstein's bat roosts) <p>The policies giving rise to this include: EN1; EN2; MD2; WI2; OC1; EC3; EC9; EC11; TR1; CF1; NH4; NH5; CC1; MD2; and WI2.</p>
13c. Increase the land area of UK Biodiversity Action Plan habitats within the district
<p>Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.</p> <p>Significant positive effect of Policy CC6: The policy will help to protect the water table which will have a significant positive effect in protecting wetland and meadow habitats in</p>

Table NTS 5.2: Effects of the Plan**Potential significant / uncertain effect identified**

the district.

13d. Maintain and improve the conservation status of selected designated and non-designated nature conservation sites

Uncertain effect of Policy SD1 as it is unclear how sustainable development is defined.

Policy MD2 (South of A39): The strategic development area does not affect any nationally or locally designated wildlife sites. Uncertain effect of Policy MD2 (NE of Seaward Way) as there is a lack of information as to whether the development would affect a nature reserve on the site.

Uncertain effect of Policy MD2 (Post 2022 West of Dunster Marsh) as there is a lack of information as to whether the development would affect Dunster Marsh Local Nature Reserve.

Policy WI2 (East of the town): The strategic development area does not affect any nationally or locally designated wildlife sites or undesignated sites. Significant positive effect of Policy CC3 and CC4 as the policies will help protect the Blue Anchor to Lilstock Coast SSSI.

The HRA has identified the following potential impacts with relation to Barbastelle Bats with relation to the Exmoor and Quantocks Oak Woodlands SAC:

- Loss of feeding habitat and severance of flight lines preventing access to feeding areas
- Mortality from wind turbine development
- Disturbance due to increased human activity around roosts as part of recreational activity generated by new residential housing and /or increased tourism (also to Bechstein's bat roosts)

The policies giving rise to this include: EN1; EN2; MD2; WI2; OC1; EC3; EC9; EC11; TR1; CF1; NH4; NH5; CC1; MD2; and WI2.

The following text summarises the mitigation measures suggested within the SA Report.

The strategic objectives should be expanded to include reference to the following:

- avoiding noise pollution and reducing effects on tranquillity;
- increasing energy efficiency and generation and use of renewable energy;
- protecting soils, in particular, high quality agricultural land;
- waste reduction and sustainable waste management;
- encouraging sustainable construction and/or water efficiency in new developments;
and
- improving the district's green infrastructure resource.

Policy SD1: Information is needed in relation to the criteria that development will be judged against in deeming it sustainable. The definition of sustainability in the plan is useful but is not enough of a check to ensure that the sustainability of the District is protected from inappropriate development. Some sustainability criteria are addressed by various Local Plan Policies. However, there may be instances where an aspect of sustainability is not addressed by a Local Plan Policy. The SA recommends that that as a minimum the headline issues that the council would expect to see within any planning application should be listed. In addition, some more detailed guidance could be provided by the council which references the appropriate standards and targets which developments should be reaching/aspiring to.

Policy MD2 has the following mitigation measures:

- Noise attenuation measures may be necessary if development occurs adjacent to the A39 or A358. These measures should be specified in the plan or in a development brief.
- Before development goes ahead the air quality implications of new development in this location should be understood. This should be specified in a development brief.
- Noise attenuation measures may be necessary if development occurs adjacent to the railway line. These measures should be specified in the plan or in a development brief.
- If development goes ahead public transport should be improved so that people can access Minehead sustainably. In addition, adequate services commensurate with the size of the development should be provided within the development. These measures should be specified in the plan or in a development brief.
- Investigation is needed regarding the need for flood attenuation measures to the south west portion of the strategic development area. These measures should be specified in the plan or in a development brief.
- It is possible that development may go ahead in areas south of the A39 in separate parcels. If this occurs each developer should be expected to carry out a landscape

appraisal before development goes ahead. This should take into account the cumulative effect of other development to the south of the A39.

Policy WA2 has the following mitigation measures:

- The development proposed should be mixed use development offering a range of services to the new residents. Development should also be expected to help resolve the severance issue in the town and the localized traffic problems this causes. This should be specified in the plan or in a development brief.
- Before development goes ahead an understanding is needed of the ability to remediate the contamination on site. This should be specified in the plan or in a development brief.
- Investigation is needed on the significance of the coastal retreat issue before development goes ahead. This should be specified in the plan or in a development brief.
- It will be necessary to ensure that development does not become visible from the south above the ridge as this forms the landscape boundary between Watchet and Williton. Careful design will be required especially in terms of building heights in some parts of the strategic development area to avoid development being visible from Williton village.

Policy EC2 has the following mitigation measures:

- The effect of development on local residents should be assessed before development goes ahead and this should be specified in the plan or a development brief. The policy would also benefit from making it clear that if development outside use classes B1, B2 and B8 are proposed they should be subject to an assessment of their effects and that this should be weighed against their contribution to the local economy.
- The effect of development on soils and geology should be assessed before development goes ahead and this should be specified in the plan or a development brief.

Policy SC6: The policy should be amended to specify commercial, community or leisure use.

Policy CC1: A full air, noise and transport assessment should be carried out before development of renewable energy systems goes ahead. This should be specified in the plan and could form part of an energy strategy which includes details on fuel supply, transport and routes as well as the carbon savings achievable.

Policy GT1: Before a site is allocated as a gypsy or traveller site an assessment should be carried out on the environmental and social effects likely to arise from the site in comparison to other available sites. This should be specified in the plan.

Policy ID1: The policy should be more specific in addressing the provision of public transport, cycling and walking where appropriate.

Policy SC4: The requirement for Code Level 4 in Policy SC4 should be extended to cover all market housing to maximise sustainability.

Policy WI2: It will be necessary to ensure that development does not become visible above the ridge line. This may be difficult to achieve on the site as the low lying areas of land are prone to flooding.

Policy WI2 and Policy MD2: If development goes ahead adequate services commensurate with the size of the development should be provided within the development. These measures should be specified in the plan or in a development brief.

Policy MD2, Policy WI2, Policy EC2: Investigation is needed regarding the need for flood attenuation measures (both fluvial and coastal) which are likely to be extensive. Measures should be put forward to reduce the risk of flooding on and off site. These measures should be specified in the plan or in a development brief.

Policies MD2 and WA2: Before development goes ahead a wider understanding is needed of the significance of developing on this area of Best and Most Versatile Agricultural land. These measures should be specified in the plan or in a development brief.

Policies WA2 and Policy WI2: A landscape appraisal should be carried out before development goes ahead. This should be specified in the plan or in a development brief.

Policies EN1 and EN2: The policies would be strengthened if more detailed references to ensuring local employment and maximising local skills were made

Policy MD2, Policy EC2, Policy WA2 and Policy WI2 all have the following mitigation measures:

- Programmes of archaeological field evaluation would be required prior to determination of individual planning applications.
- If development goes ahead a full ecological assessment should be carried out to determine which areas should be avoided because of their higher ecological value. This should be specified in the plan or in a development brief.
- To enhance sustainability the site development process should address how the site can enhance biodiversity at all levels including how BAP habitats and species can be enhanced. This should be specified in the plan or in a development brief.

6 Monitoring

Regulations governing SA state that the significant effects of the plan should be monitored. This is so that any unexpected effects can be identified and action taken to reduce / eliminate these effects. A SA monitoring framework has been outlined in the SA report. This will enable the monitoring of the negative and uncertain effects of the plan. Some of the monitoring measures suggested for the Local Plan are described below:

- A monitoring system should be put in place in relation to Policy SD1. This should examine how developments that are granted permission contribute to sustainability and the results should be used to strengthen the policy in the future;
- The effects on various environmental, social and economic issues should be assessed and monitored for any development where there is a risk that there will be a negative impact. This includes effects on noise and visual intrusion, traffic, greenhouse gas emissions, flooding, heritage, landscape and biodiversity;
- The success of several of the policies in achieving their objectives should be monitored. This includes the effects of Policy NH1 in protecting residents against air and noise pollution, policies CC2, CC3 and CC6 in reducing the risks of flooding, Policy ID1 in ensuring the provision of adequate services (including green infrastructure), Policy NH1 in protecting heritage, Policy CC6 in helping to protect and enhance biodiversity, policies SC1, SC2 and the economic policies on strengthening the economy of the district and Policies CC3 and CC4 in helping to protect the Blue Anchor to Lilstock Coast SSSI;
- The provision of energy efficiency measures, renewable energy and water saving measures provided as part of development should be monitored;
- The effects of gypsy and traveller sites on various issues should be monitored;
- The effect of any development that brings development in Minehead closer to Exmoor National Park should be monitored for its landscape effects and visual impact;
- The effect of Hinkley Point and other major energy generating proposals on local employment and local skills should be monitored;
- Counteracting measures have been put forward within the HRA which include:
 - the inclusion of a Bat Consultation Zone policy;
 - the development limit is added to the key diagram for Minehead for sites A4, A5 and A6
 - additional policy text under Policy MD2 and within Appendix 1 for strategic site numbers A4, A5 and A6 in Minehead to offset potential impacts on barbastelle bats; and
 - the inclusion of a Wetland Bird Consultation Zone policy.

The inclusion of these measures needs to be checked to ensure that the plan is not having a significant effect on Natura sites

7 Next Steps

The Local Plan Preferred Strategy will now be consulted on with the public. The plan will then be further developed and submitted to the Secretary of State for Public Examination. If significant changes are made at this stage, a further sustainability appraisal will be undertaken and an updated report produced.

The independent Public Examination will test the “soundness” of the Local Plan and consider representations on that basis. The Inspector appointed by the Secretary of State to conduct the Examination will produce a report with recommendations which, dependent on the progress of the Localism Bill, will be binding. Any changes required by the Inspector will be incorporated and then the Local Plan will be adopted.