

55: RESPONSES TO SUSTAINABILITY APPRAISAL						(General matters only - site specific matters covered in settlement schedules)			
Rep No	Objector ID	issue ref	Extra Docs	Contact Name	Company / Organisation	Policy	Issue summary	Changes sought to the Pre-Submission Plan / SA report	MDC response
081	6090	1		Stewart Brock	Somerset County Council	Sustainability Appraisal	The consideration of SA09 only references bus services and makes no assessment of frequency of bus services. There is no consideration of walking or cycling. The potential role of cycling from new developments needs to be assessed as it is the ideal form of transport for trips of 0.5km - 5km. The advent of Ebikes also makes it more feasible for less able people and those in hillier areas.		SA09 assesses whether a site will SA09 encourage more sustainable travel patterns including minimising the need for travel by the private car and promoting cycling, walking and use of public transport. Assessments have been carried out of the accessibility of sites by footpath, pavement or multiuser path and the accessibility of the site to a range of basic services, as well as public transport. A indication of the frequency of bus service is assessed, as well as whether it allows a journey to work. SA adequately assesses whether a site will encourage more sustainable travel patterns. No change to the plan.
082	6090	2		Stewart Brock	Somerset County Council	Sustainability Appraisal	The suitability of each site should be considered with respect to access to key services such as secondary schools and town centres on foot and for peripheral sites by cycle, not just proximity to bus routes.		A general assessment of sites accessibility to a range of basic facilities and relationship to the urban form is included in the SA. No change to the plan.
581	1797	1	no	Amanda Grundy	Natural England	HRA	A requirement to "retain and enhance habitat and features of value to horseshoe bats wherever possible and to ensure replacement habitat is optimal for the affected species.	Add additional requirement to the site policies affected by Bat Consultation zones.	Policy DP6 of LPP1 sets out requirements for sites within the Bat Consultation Zone. Site put forward in LPP2 have been subject to HRA and issues concerning bats highlighted. No change to the plan.
581	1797	2	no	Amanda Grundy	Natural England	Sustainability Appraisal	SA demonstrates a reasonable understanding of the plan in relation to the natural environment and provides an adequate assessment of potential effects on designated sites, habitats, species, landscape and geology	none	Support is noted.

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581	1797	3	no	Amanda Grundy	Natural England	Sustainability Appraisal	Impacts on landscape assessment are likely to be more severe for Wells and the rural areas, and anticipates that cumulative impacts will be relatively significant. Mitigation measures are suggested. Where development might affect the AONB that abuts Wells the Council should seek advice from the AONB partnership / staff at an early stage.	Ensure AONB partnership / staff are consulted	Policy DP4 of LPP1 sets out criteria in relation to landscape designations, including the AONB. The AONB has been included in Sustainability Assessment of sites where appropriate. No change to the plan.
581	1797	4	no	Amanda Grundy	Natural England	Sustainability Appraisal	Not clear how soils and ALC have been considered in the SA. Local plan should give appropriate weight to the role performed by the areas soils. They are a finite multifunctional resource which underpins wellbeing and prosperity. Development has a major and usually irreversible adverse impact on soils. Mitigation should aim to minimise soil disturbance and retain as many ecosystem services as possible through careful soil management through the construction process. NPPF refers to soils at paras 109 and 112. Plan policies should take account of the impact on land and soil resources, such as safeguarding the long term capability of the best and most versatile agricultural land, to avoid development that would affect soils of high environmental value and ensure soil resources are conserved and managed in a sustainable way.	Plan policies should refer to the DEFRA code of practice for the sustainable use of soils on construction sites.	ALC has been included in sustainability appraisals under SAO12 for each potential site and regard had to paras 109 and 112 of NPPF in weighing up the suitability of sites. However, the SA summaries included in Appendix 6 do not fully reflect the regard had to ALC earlier in the assessment process. Amend Appendix 6 to more fully reflect the weight attached to ALC where sites include land of grades 1,2 or 3a. Change proposed.
581	1797	5	no	Amanda Grundy	Natural England	Sustainability Appraisal	To safeguard best and most versatile agricultural land strategic scale ALC maps are available and some other more local data is available for some locations. The LPA should ensure that sufficient ALC survey data is available to inform decision making. Where no reliable information is available it is reasonable to expect developers to commission an ALC survey for site put forward for local plan consideration.	Ensure developers carry out an ALC survey where information is not already available.	Best and most versatile agricultural land has been assessed using the best information available, using both strategic and local maps. In some cases it has not been possible to distinguish between grade 3 a and grade 3 b land. As this is only 1 factor in the site selection process it would not be reasonable or proportionate to require on site survey of the agricultural land classification to distinguish between these grades. No change to the plan.