

MATTER I: DUTY TO COOPERATE AND OTHER LEGAL REQUIREMENTS

1.5 “Have the likely environmental, social and economic effects of the plan been adequately addressed in the Sustainability Appraisal? Does the appraisal test the plan against reasonable alternatives for the distribution of housing and employment land?”

As discussed below, in response to question 2.4, the JCS requires a review of the Settlement Audit to ensure that service villages identified by the JCS are still appropriate to the TBP; a review which, in our opinion, has not been satisfactorily carried out. The requirement for is not discussed within the Sustainability Appraisal and such, the Sustainability Appraisal does not fully consider whether reasonable alternatives for the distribution of housing might arise as a result of changes to the Settlement Hierarchy.

Section 4 (paras 4.9 – 4.22) of the Sustainability Appraisal sets out the relationship between the TBP and the JCS and the interwoven timelines of the preparation of both plans. Para 4.11 describes the time period relating to the adoption of the JCS and the implications on the TBP preparation. Whilst it notes that the list of service villages at Table SP2c has been revised to include Stoke Orchard and delete Twigworth, it does not note the requirement at page 26 to review the Settlement Audit. There is also no reference to the 2017 Settlement Audit Refresh that was carried out prior to the adoption of the JCS.

At para 4.12 the Sustainability Appraisal states that the TBP Sites Background Paper (2018) explains how the JCS Policy SP2 has been applied to investigating the size, function, proximity, and accessibility of settlements. We assume the reference is to the Housing Background Paper (EB010) as a Sites Background Paper is not available in the Examination Library. The Housing Background Paper sets out how the disaggregation of development to the rural service centres and service villages within the Settlement Hierarchy has been informed by these criteria. The Housing Background Paper states that the starting point for the distribution of development in the rural areas was drawn from evidence set out within the Settlement Audit; it does not consider whether the service villages identified by the JCS are still appropriate.

In our view the Sustainability Appraisal should discuss how the requirement to review the Settlement Audit has been carried out, whether the service villages identified by the JCS are still appropriate and whether it provides justification for any reasonable alternatives for the distribution of housing and employment land. Should changes to the settlement hierarchy or reasonable alternatives be justified as a result of the review, there would be deeper

implications for the appraisal. It would be necessary to review the range of potential site options that have been assessed and if required include sites that have not already been assessed in the Sustainability Appraisal.