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## Report on Questionnaire Answers

Questionnaire: South Gloucestershire Sustainability Appraisal 2020

Question: [2: Comments on the Sustainability Appraisal] If you have any comm...

Respondent Name	User Response: Text	Response Created
Adam Gould	<p>At present in Table 3.1 under lack of suitable land remaining you make reference that "The Local Plan 2020 will look at refreshing the settlement boundaries where appropriate, in order to protect the countryside from inappropriate development."</p> <p>Under the document there is limited acknowledgment or recognition that there are areas of villages which are in the Green Belt and outside the settlement boundary but are exactly the same as the rest of the village (Frampton Cotterell) in terms of development and connectivity.</p> <p>Consideration needs to be given to refreshing settlement boundaries and Green Belt in order to both protect inappropriate development but to also acknowledge areas which are already developed. Only providing one lens that changes to settlement boundary will protect development doesn't acknowledge that changes to settlement boundaries are required to encourage development in appropriate areas that have historically been inappropriately excluded.</p>	01 Mar 2021
Amanda Grundy - Natural England	<p>Interim Sustainability Appraisal:</p> <p>In our view, the Sustainability Appraisal provides a fair and detailed assessment of the sustainability performance of the priorities, building blocks, guiding principles and various policy and locational options for accommodating growth and new development. It identifies a number of aspects that could be strengthened and makes recommendations for subsequent stages of the Local Plan, all of which Natural England would support, particularly with respect to making more explicit the role of GI in addressing the effects of Climate Change and the health benefits of enhancing access to green space and active travel.</p> <p>Given the challenge of meeting raised ambitions across many of the Plan's priorities, the SA is an important tool for furthering integration of objectives and policies and helping to avoid 'trade-offs' between what can be viewed as conflicting goals.</p>	30 Mar 2021
Amy Gould	<p>At present in Table 3.1 you state that "The Local Plan 2020 will look at refreshing the settlement boundaries where appropriate, in order to protect the countryside from inappropriate development."</p> <p>There is limited acknowledgment or recognition that changes to settlement boundaries are also required to direct development to areas of the village which have been artificially excluded from development due to inappropriate settlement boundaries (e.g. they are not based on methodology held by South Glos. and are counter to any methodology adopted by any settlement reviews undertaken by neighbouring Councils).</p>	01 Mar 2021
Ann Fray	<p>Please stand by the proposals you put in place!</p>	25 Feb 2021

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Ashfield Land	<p data-bbox="306 286 839 320">3.0 THE SUSTAINABILITY APPRAISAL:</p> <p data-bbox="306 360 1315 499">3.1 There were significant issues with the Sustainability Appraisal that supported the JSP. The primary issue was that the detailed version was undertaken after the Spatial Strategy and certain sites were selected, meaning that the strategy was clearly pre-determined and not justified by the evidence base.</p> <p data-bbox="306 539 1289 741">3.2 We are pleased to see that the Issues and Approaches consultation document is accompanied by two SA Reports which indicates that this is assessment is being considered at an early stage within the Plan-making process. One report has been prepared by SGC, the other undertaken by Land Use Consultants (LUC). The SGC report represented an early scoping report that was intended to set the context and objectives of the SA and establish the baseline of this assessment.</p> <p data-bbox="306 781 1331 884">3.3 The LUC report further develops this baseline and attempts to provide a SA assessment of the ‘Building Block’ strategy options that the Local Plan is considering, set against the identified 9 key priorities that the SGC scoping document established.</p> <p data-bbox="306 925 1251 987">3.4 We have examined both SA Reports in detail and have some comments and concerns in respect of the following key issues.</p> <p data-bbox="306 1028 1331 1162">3.5 Firstly, the SA focuses on the appraisal of the ‘Building Block’ options that the Local Plan is considering. However, these are in effect Spatial Strategies as we set out in the previous section and we have questioned whether it is appropriate that these are determined at the Local Plan, rather than the SDS level.</p> <p data-bbox="306 1202 1326 1236">3.6 Secondly, we have concerns over paragraph 2.10 of the LUC Report which states:</p> <p data-bbox="306 1276 1331 1478">“The SA findings are not the only factors taken into account when selecting options to take forward in a Plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to ‘rank’ them based on sustainability performance in order to select an option. Factors such as public opinion, deliverability, and conformity with national policy will also be taken into account by Plan-makers when selected options for their Plan.”</p> <p data-bbox="306 1518 1337 1865">3.7 We disagree with this approach; as we previously demonstrated as part of evidence connected to the JSP, it is possible to provide a ranking system by applying a simple weighting value to each of the effects identified as part of Figure 2.1 of the LUC report. This will then give a ranking system that is easy for the public to relate to. If the other factors, such as those identified in para 2.10 of the LUC report referenced above, then justify why the highest ranked option has not been pursued, these can then be set out in clear and understandable terms. However, this is no reason to not present a ranked system in the way we describe, otherwise we question why rate each effect in terms that grade their positive of negative benefits (+ or -) in any event.</p> <p data-bbox="306 1906 874 1939">(Please see the attached document for Figure 2)</p> <p data-bbox="306 1980 1262 2013">Figure 2. Illustration of a potential weighting system that could be applied to SA</p>	31 Mar 2021

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	<p>assessment</p> <p>3.8 The SA should inform the Plan-making process and Planning Practice Guidance (PPG) quite clearly states that ‘sustainability appraisal is integral to the preparation and development of a Local Plan’ (Para: 006, Ref ID: 11-006-20140306), and ‘[the sustainability appraisal] should inform the selection, refinement and publication of proposals (when preparing a Local Plan, paragraph 152 of the NPPF should be considered)’ (Para: 018, Ref ID: 11-018-20140306). Whilst we agree that there are other factors at play, the key aim of Plan-making is to ensure that sustainable patterns of development are delivered. The SA ranking will set out, in SA terms, which option should be selected to achieve this.</p> <p>3.9 We have undertaken an assessment of the ‘Building Blocks’ within the new SA with the weighting system set out above. This can be found in Figure 5 of these representations and clearly demonstrates that again, following the Building Block 1 Urban Areas, Building Block 2 – Urban Extensions – is the most sustainable option for development. We discuss this further in Section 5 of these representations.</p> <p>3.10 As part of the Plan-making process, SGC would be able to acknowledge which options are the most sustainable from the SA, following which they then can decide whether there are other Plan-making decisions which influence the selection of policies and sites, and set out the clear reasons for this. However, we would question why public opinion would be a reason to ignore the most sustainable strategy on its own; often development is unpopular and simply saying the negative public opinion will sway such decision making is very concerning, given the need to select the most sustainable strategy in the context of the declared climate emergency.</p> <p>3.11 We then have concerns over certain aspects of the Framework and the effect criteria set out. Table 5A of the South Gloucestershire Scoping Report sets out the objectives and effects that will be used, albeit we note that in several instances these are still yet to be confirmed/ratified, and on certain pages the tables have printed incorrectly and can’t be viewed in full. We query why these are yet to be confirmed, particularly as this information is very similar to the SA Scoping Report that was published in 2018 as part of the original Local Plan Review that was being undertaken in conjunction with the JSP. For example, the effect criteria of Objectives 1a, 1b, 2c, 3a, 5b, 5d, and 7a are all yet to be confirmed and there also appears to be a description of the significant positive effects missing for some of the other objectives. These need to be defined as soon as possible to allow for objective analysis to be undertaken.</p> <p>3.12 Paragraph 2.23 of the LUC SA Report states that ‘the reasonable alternative policy options for the Local Plan has been appraised against the SA objectives in the SA Framework.’ However, we then go on to note that it states in paragraph 2.30 that ‘as site options and allocations will only be considered at a later stage in the Plan preparation process and have not been considered for the Local Plan 2020 Phase 1 document, the criteria have not been used for the appraisal work included in this SA Report.’ Whilst we appreciate this, there is then no explanation of how the Phase 1 document has been assessed against the sustainability objectives, and as such, this leads us to question how the SA work undertaken by LUC could have assessed the effects of the policy options presented in the Local Plan Phase 1 document, other than</p>	

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	<p>via subjective assessments.</p> <p>3.13 Of more concern, the LUC Report states ‘in some instances, the appraisal of policy options reflects other factors which are of relevance in relation to the achievement of an SA objective but which falls outside of the scope of the site assessment effects criteria.’ It is therefore unclear whether the SA has been influenced by other decisions that the reader doesn’t know about; the SA should be an independent, objective assessment with a clear set of criteria that proposals are assessed against.</p> <p>3.14 We also have concerns over the scoring system used – we note that the Scoping Report published in support of the new SDS has been simplified and a new scoring system has been proposed as set out in Figure 3.</p> <p>(Please see the attached document for Figure 3)</p> <p>Figure 3. Extract of the IIA Framework proposed in support of the Spatial Development Strategy</p> <p>3.15 This is much easier to understand for the general reader and we question why this approach couldn’t be used for the SGC Local Plan. Again, a simple weighing system could be applied to the SDS criteria to give the reader a better understanding of which strategy is the most sustainable and should be given most thought for the Plan to pursue.</p> <p>3.16 Regarding Table 4.4 of the SA Report, which begins to assess the policy options in terms of ‘Building Blocks,’ again the SA has begun to slip back into the more complicated scoring process used in the JSP by incorporating other symbols which aren’t set out in the Scoring Key. For example, there is now ++/-- used, as well as --?, and symbols mixed up the wrong way (i.e. +/-). We appreciate that the SA process isn’t a simple task and there will be a mixture of effects, but there is no doubt that this method contributes to confusion and could be easily simplified.</p> <p>3.17 The importance of this point has been emphasised by the Courts at the highest level. For example, Berkeley v SSETR [2001] 2 AC 603 the Housing of Lords stated that it must be compiled in a way that is easily understood by the lay person without the need for expert assistance; the same applies to a SA. This is further reiterated in the RTPI’s Strategic Environmental Assessment Practice Note (January 2018) which states ‘given the wider public involvement and interest in the outcomes, the SA also needs to be presented in such a way that it can be readily understood’ (page 23).</p> <p>3.18 Whilst we consider that the SA is headed in the right direction, it has still taken quite some time for a team of professionally accredited Planners to understand what the process is, let alone for a member of the general public. This needs further refinement for the next stages of consultation and we strongly urge the council to consider an alternative, simpler assessment system to which a numerical weighting is applied.</p>	
Barwood Development	We have the following comments to make in response to the Sustainability Appraisal supporting this component of the consultation document:	12 Apr 2021

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Securities & The North West Thornbury Landowner Consortium	<p>? 1a Contribution to Climate Change: It is unclear why Building Block 3 (Market Towns) has been given a similar score to Building Block 4 (Rural Settlements) – they are by their nature, completely different in terms of their services/facilities, and employment opportunities – and thus associated opportunities for sustainable travel. More specifically, the reference at paragraph 4.39 to Thornbury and access to Enterprise Areas is incorrect (bus service T1 provides direct access to Filton Enterprise Zone in less than 20 mins (the standard suggested in Appendix 4 of the SA).</p> <p>There is also no explanation why a new settlement (Building Block 5) would score better than the existing Market Towns. Whilst any new settlement would be required to deliver community facilities; whether it would deliver an entirely new High Street and the scale of development already at Market Towns is very questionable. Take for example the previous new settlement proposals at Buckover. This had a far smaller retail/community offer than that which exists at the market towns of Yate and Thornbury. Thus, whilst recognising that it will deliver benefits, in terms of its assessment against Objective 1a), it cannot be considered to be more positive than development Market Towns.</p> <p>? 2c (Air Quality) and 2b (Noise): In line with the comments above, it is of concern that Building Block 3 scores comparably to rural development in this regard. A dispersed strategy of smaller scale growth is likely to have a greater impact, particularly on air quality, than planned larger scale growth at the Market Towns.</p> <p>? 2a (Public Open Space): Paragraph 4.42 indicates that the Market Towns have some existing public open space, and it is thus scored a minor positive. In regard to Building Block 4 – this is scored positively because it has access to the countryside, and Building Block 5 because it will enable the delivery of new public open space. Both of these positive attributes are equally applicable to Building Block 3, and we would suggest clearly indicate that in relation to this objective, Building Block 3 should score ‘++,’ being capable of achieving three separate individual positives.</p> <p>? 2d/3c/3d/3e (Access to health, education, community, and retail): No commentary is provided in respect to the scores attributed to Building Block 3 for these objectives. We note that in relation to Building Block 2, reference is made to the scale of development providing opportunity to deliver new services/facilities (#4.44); and it scores positively as a result. We suggest that at this stage, there is no indication that large-scale development via Building Block 3 would not also secure new services/facilities. It is very surprising that Building Block 3 has been scored the same as Building Block 4 given there are clear differences between the access to services and facilities between the Market Towns and rural settlements. We would expect there to be a differentiation between these two building blocks when assessed against this objective.</p> <p>? 4a (New Employment Floorspace): Any large-scale development, whether urban extensions to Market Towns or new settlements, is capable of delivering new employment floorspace whether within a joint allocation, or via standalone employment allocations across the same settlement. At this stage of the new Local</p>	

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	<p>Plan process, we do not consider that there is justification for scoring Building Block 5 higher in this regard – with development associated with Building Blocks 2 and 3 equally capable of delivering large scale employment.</p> <p>? 5a and 5b (Historic Environment): It is virtually impossible to robustly test such broad spatial strategies against the impact that they would have on designated and undesignated assets. Rather than attempt to apply a measure at this stage which would inevitably be based upon a wide range of assumptions about not only the sites which fall within the building blocks, their scale, the proximity to heritage assets, inherent and designed mitigation measures etc, this objective should be applied at the next stage of SA.</p> <p>? 5e (Green Infrastructure): In line with our comments above, it is unclear why Building Block 3 has been scored lower than 2 and 5. It may be equally capable of delivering green infrastructure at the scale of the other two. It is incorrect to assess Building Block 3 as the same as Building Block 4 – larger scale development in the Market Towns would likely deliver substantially more new green infrastructure than smaller scale rural development.</p> <p>Green Belt:</p> <p>The consideration of development options within the Green Belt must be assessed in accordance with national planning policy – with consideration first required to sustainable locations outside of the Green Belt. The inclusion of a single objective within the SA doesn't constitute a robust assessment in this regard, and we assume that in moving to the next stage of the Local Plan, that this element of the evidence base will be developed further.</p>	
Bristol and England Properties (BEP)	<p>7. SUSTAINABILITY APPRAISAL FOR THE PHASE 1 DOCUMENT:</p> <p>7.1 There does not appear to be a specific set of questions relating to the Sustainability Appraisal for the Phase 1 document. However, we have made some general observations below, principally in respect of the approach to the Green Belt.</p> <p>7.2 Paragraph 3.27 acknowledges Green Belt as a planning consideration, but not a specific sustainability issue that needs to be addressed through the SA. Indeed, the Green Belt designation and desire to protect it is often a barrier to delivering sustainable development. Where Green Belt constrains development around an urban area with development pressures, development is simply pushed further away from the centre leading to longer commuting times, dormitory settlements, and less sustainable patterns of development.</p> <p>7.3 Furthermore, Green Belt land is often among the most sustainably located land within a District and its release has the potential to make a significantly greater contribution to the wider objectives and guiding principles of the Plan.</p> <p>7.4 We understand that the Council has included the protection of the Green Belt as an objective to be assessed through the SA, with a view to understanding how the various building blocks would contribute to its protection. However, it is important that any SA of development options needs to be 'policy off' in Green Belt terms because</p>	17 May 2021

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	<p>whether land is or is not designated as such is essentially irrelevant in sustainability terms.</p> <p>7.5 This is why we have concerns with the SA's conclusion that the loss of Green Belt land may have a minor adverse impact in sustainability terms on the basis that it supports the optimisation of development density and Brownfield sites (paragraph 4.18). It is our view that Green Belt releases are only considered once all other reasonable alternatives have been considered, including how development within existing urban areas can be maximised. As such, whether Green Belt land is released or not, has no real bearing on the extent to which Brownfield sites are maximised.</p> <p>7.6 This is not to say that Green Belt land should not be protected. National Policy is clear in that Green Belt boundaries should only be altered where exceptional circumstances can be demonstrated. However, the development of Green Belt land is not inherently more or less sustainable than the development of non-Green Belt land and so it should not factor into the SA.</p> <p>7.7 The significant adverse impacts of the five building blocks to the Green Belt identified in Table 4.4 of the SA are essentially irrelevant for the purposes of assessing sustainability.</p> <p>7.8 This is also the case at Table 4.7 which summarises the sustainability effects of options for growth at rural communities in the context of the Green Belt. The fact that Option 2 would have a significant adverse impact on the Green Belt, compared with a minor positive impact of Option 1 is irrelevant for the purpose of the Sustainability Appraisal. What is important is that Option 2 performs as well or better against all of the other SA objectives.</p> <p>7.9 That said, it does not appear that the consideration of impacts to the Green Belt have affected the SA's recommendations and we note its support for the exploration of Green Belt releases to meet the District's development needs.</p>	
Dominick Veasey - Nexus Planning Limited	<p>These representations are submitted on behalf of who have interests in Land surrounding the former Shortwood Golf Course, Mangotsfield ("the Lower Shortwood Site"). For reference a Site Location Plan is included as Appendix A.</p> <p>As part of the recent Call for Sites process, a Lower Shortwood Vision Document and accompanying Transport Vison was submitted. The Vision Document sets out the vision for creating a new settlement on the Eastern fringe of Bristol which comprises a collection of distinctive neighbourhoods with the principles of sustainability, health and well-being at their core. These representations should be read alongside the Lower Shortwood Vision Document and Transport Vision.</p> <p>As set out within our representations to the five proposed Building Blocks, we are supportive of Building Block 2 which relates to expanding the main urban areas through urban extensions.</p> <p>It is evident from the assessment of Block 2 against the Sustainability Appraisal criteria that overall the approach achieves positive sustainability outcomes. However with regard to a number of the Block 2 assessment outcomes we make the following</p>	19 Mar 2021

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	<p>comments:</p> <p>Biodiversity (5c):</p> <p>The Biodiversity (5C) outcome for Block 2 (and also Blocks 3, 4 and 5) is a double negative/uncertain. By reference to the assessment commentary, namely SA paragraph 4.54, the assessment outcome is based on the view that:</p> <p>(a) Building Block 2 would involve greenfield land take which were previously relatively undisturbed.</p> <p>(b) Potential impacts on SSSIs in close proximity to the urban edge, market towns and rural villages and settlements.</p> <p>(c) Impact on designated Severn Estuary sites.</p> <p>However, not all greenfield land is undisturbed and biodiversity rich. Intensely managed agricultural land often has very limited biodiversity value. As a former golf course, the Lower Shortwood site also has been intensively managed and again has limited biodiversity value.</p> <p>Not all urban edge locations are within proximity or will have an impact on SSSIs. Indeed, the Lower Shortwood Site is one such example.</p> <p>Similarly, not all urban edge location will have an impact on designated Seven Estuary sites. The Lower Shortwood Site again being one example.</p> <p>Given the above, the Biodiversity (5c) outcome for Block 2 appears wholly unjustified. At best, the outcome should be minor negative/uncertain outcome. However, in locations such as Lower Shortwood the Biodiversity outcome is expected to be a net gain outcome, through the creation of significant new Green Infrastructure.</p> <p>Land use (5f/5g):</p> <p>The land use outcome (5f/fg) relates to maximising the reuse of previously developed land and minimising the loss of productive land, especially best and most versatile agricultural land.</p> <p>It is accepted that Building Block 1, which focuses growth within existing urban areas is likely to achieve a positive outcome against the land use Sustainability Appraisal framework objectives. However, it is unclear why Building Block 2, 4 and 5 achieve a double negative outcome whereas Building Block 3 achieves a single negative outcome.</p> <p>Chapter 5: Strategy of the Local Plan confirms that Building Block 3 relates to land around the edges of the three market towns (Yate, Thornbury and Chipping Sodbury). In view of this, the Building Block will also inherently require greenfield land take and the potential loss of agricultural land. Building Block 3 should therefore achieve the same Sustainability Appraisal outcome as Building Block 2, 4 and 5 i.e. double</p>	

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	<p>negative.</p> <p>Green Belt:</p> <p>Building Blocks 2 and 4 achieve double negative outcomes against Green Belt (7a). Building Block 5 achieves a double negative/uncertain. Whereas Building Block 3 achieves a minor negative. The rationale for assessing Building Block 3 to only have a minor negative outcome is that part of the land around the three market towns (namely land to the North) are outside of the Green Belt. However, given the uncertainty regarding the location of any development under Building Block 3 would ultimately go we consider the outcome should be at least double negative/uncertain.</p>	
Edward Ware Homes	<p>7. SUSTAINABILITY APPRAISAL FOR THE PHASE 1 DOCUMENT:</p> <p>7.1 There does not appear to be a specific set of questions relating to the Sustainability Appraisal for the Phase 1 document. However, we have made some general observations below, principally in respect of the approach to the Green Belt.</p> <p>7.2 Paragraph 3.27 acknowledges Green Belt as a planning consideration, but not a specific sustainability issue that needs to be addressed through the SA. Indeed, the Green Belt designation and desire to protect it is often a barrier to delivering sustainable development. Where Green Belt constrains development around an urban area with development pressures, development is simply pushed further away from the centre leading to longer commuting times, dormitory settlements, and less sustainable patterns of development.</p> <p>7.3 Furthermore, Green Belt land is often among the most sustainably located land within a District and its release has the potential to make a significantly greater contribution to the wider objectives and guiding principles of the Plan.</p> <p>7.4 We understand that the Council has included the protection of the Green Belt as an objective to be assessed through the SA, with a view to understanding how the various building blocks would contribute to its protection. However, it is important that any SA of development options needs to be 'policy off' in Green Belt terms because whether land is or is not designated as such is essentially irrelevant in sustainability terms.</p> <p>7.5 This is why we have concerns with the SA's conclusion that the loss of Green Belt land may have a minor adverse impact in sustainability terms on the basis that it supports the optimisation of development density and Brownfield sites (paragraph 4.18). It is our view that Green Belt releases are only considered once all other reasonable alternatives have been considered, including how development within existing urban areas can be maximised. As such, whether Green Belt land is released or not, has no real bearing on the extent to which Brownfield sites are maximised.</p> <p>7.6 This is not to say that Green Belt land should not be protected. National Policy is clear in that Green Belt boundaries should only be altered where exceptional circumstances can be demonstrated. However, the development of Green Belt land is not inherently more or less sustainable than the development of non-Green Belt land and so it should not factor into the SA.</p>	05 May 2021

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	<p>7.7 The significant adverse impacts of the five building blocks to the Green Belt identified in Table 4.4 of the SA are essentially irrelevant for the purposes of assessing sustainability.</p> <p>7.8 This is also the case at Table 4.7 which summarises the sustainability effects of options for growth at rural communities in the context of the Green Belt. The fact that Option 2 would have a significant adverse impact on the Green Belt, compared with a minor positive impact of Option 1 is irrelevant for the purpose of the Sustainability Appraisal. What is important is that Option 2 performs as well or better against all of the other SA objectives.</p> <p>7.9 That said, it does not appear that the consideration of impacts to the Green Belt have affected the SA's recommendations and we note its support for the exploration of Green Belt releases to meet the District's development needs.</p> <p>7.10 Green Belt matters aside, we are also slightly concerned that in assessing the building blocks, significant adverse impacts have been noted on the basis of development coming forward in relatively specific locations. For example, we note that a significant adverse impact has been noted for development at Market Towns on the basis that development around Thornbury would lead to the loss of Grade 2 agricultural land (paragraph 4.58). However, land around other market towns (such as Yate) is generally poorer quality and so a strategy which sought to bring development forward at Yate but not Thornbury would have a lesser impact. We would expect the SA to be updated to reflect this as the spatial distribution strategy develops.</p>	
<p>Ellandi LLP On Behalf of Crestbridge Corporate Trustees Ltd and Crestbridge T...</p>	<p>SUSTAINABILITY APPRAISAL:</p> <p>5.9 It is noted that a Sustainability Appraisal (SA) is being carried out alongside the preparation of the Local Plan 2020 in order to identify the relative environmental, social and economic performance of possible strategic, policy and site options and to evaluate which of these may be more sustainable.</p> <p>5.10 In doing so, it has prepared a report titled Sustainability Appraisal: Local Plan 2020 Phase 1 – Issues and Approaches Document (November 2020) which, inter alia, identifies sustainability issues and challenges which could affect or be addressed by the Local Plan 2020. It also develops the “Sustainability Appraisal Framework” which will form the basis for assessment of the Local Plan 2020..</p> <p>5.11 Using the scoring matrix within the Sustainability Appraisal Framework at Table 4.6 of the SA, we have undertaken our own appraisal of the proposed allocation of Yate Town Centre for redevelopment should this be pursued in accordance with the Place Making Principles set out at Appendix 1.0 to this representation.</p> <p>5.12 This has regard to the key SA priorities defined at Paragraph 4.3 of the report:</p> <ul style="list-style-type: none"> <li>• Pursue a Carbon neutral and resilient future in a changing climate;</li> <li>• Protect and enhance the environment;</li> </ul>	<p>05 May 2021</p>

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	<ul style="list-style-type: none"> <li>• Development that promotes health and well-being;</li> <li>• Creating exceptional places and spaces;</li> <li>• Planning for urban and rural areas;</li> <li>• Provide the right type and number of new homes;</li> <li>• Enable a productive, clean and inclusive economy;</li> <li>• Achieving sustainable travel and transport; and</li> <li>• Ensuring the timely and efficient provision of infrastructure to support growing communities.</li> </ul>	
Emma Jarvis	<p>Table 4.4:</p> <p>Disagree 1a for BB5 is ++/-- Climate Change. Disagree with significant positive as remote satellite villages will increase travelling to the main town and city centres. Employment in a new settlement will be limited and cannot cater for all all skill sets and careers like a city centre (4.41).</p> <p>Disagree 2c fro BB5 is ++/-- air quality. Disagree with significant positive as remote satellite villages will increase travelling to the main town and city centres. Employment in a new settlement will be limited and cannot cater for all all skill sets and careers like a city centre (4.41).</p> <p>Disagree 2d for BB5 is ++/-- access to healthcare. How can a place which does not exist be given a double positive for an unknown access to healthcare? It should be ?/-- . A location on the edge of the County would be severely remote from regional A&amp;E facilities (4.47).</p> <p>Disagree 5e for BB5 is ++? for green infrastructure. This should be --. Losing green fields to development cannot be seen as a positive. What if that new settlement is in an area of the region's green infrastructure, it would be a massive loss of green infrastructure.</p> <p>Table 4.6. The market town of Chipping Sodbury should be added to this list.</p> <p>Some of the appendix maps are illegible, poor quality and pixelated. You cannot zoom into them to look at them in more detail or identify a particular place.</p> <p>Appendix 4 Table. 5g loss of productive land. There is no uncertainty in the loss of Grade 3 agricultural land. We need to make the most of our good quality land for growing food locally. This grade land is efficient at growing crops per square metre, it cannot be replaced. It is a Significant Negative.</p> <p>Appendix 4 Table 7a. Protect and enhance valuable Green Belt. This is not necessarily a significant negative. The belt could potentially be expanded outwards along the outer edges freeing up strips of developable land on the inside but with no total loss of</p>	28 Feb 2021

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	Green Belt area, it could be reallocated.	
Fiona Milden - Vistry Homes Limited	<p>Paragraphs 3.5 - 3.6 of the Sustainability Appraisal (SA) highlight where the policy context of the Local Plan may change during its preparation. Paragraph 3.6 advises that “UK and sub-national Climate Change policy may change as public awareness and prioritisation of the threat of Climate Change grows, as illustrated by the increasing number of Local Authorities, including South Gloucestershire, that have declared a Climate Emergency.</p> <p>It is disappointing that Climate Change is not already an established policy tool for determining the sustainability of the Local Plan. South Gloucestershire Council has committed to achieve net zero Council emissions by 2030 and area-wide emissions by 2045.</p> <p>The findings of the Council’s baseline Carbon emissions baseline gap analysis indicate that Carbon emissions from domestic, non-domestic properties and transport account for almost all emissions within South Gloucestershire, relatively evenly distributed between these three categories.</p> <p>The South Gloucestershire Climate Change Strategy 2018 - 2023, currently outlines an emissions reduction of 80% by 2050, which at that time was in line with existing UK Government targets.</p> <p>To achieve this target will require significant reductions in Carbon emissions from transport, a very high take up of electric vehicles and a substantial reduction in mileage. Land use planning will be critical to address the current imbalance between employment and resident workers, to increase the provision of homes close to the major urban areas and the associated services and facilities to achieving long-term, sustained reductions in Carbon emissions from transport.</p> <p>Relevant Government policy regarding Climate Change is already in existence and should be taken into account in the preparation of this Local Plan. Policies for the Sixth Carbon Budget and Net Zero (December 2020), prepared by the Climate Change Committee details the Government’s policy commitments across a wide range of sectors including decarbonising land use change and surface transport. The Sustainability Appraisal should take into account these policies in the appraisal of the Local Plan.</p> <p>Section 4 of the SA appraises the likely effects of the Local Plan’s potential priorities on the environment. Potential priority 6 would serve to provide the right type and number of new homes. At paragraph 4.20 it anticipates that delivery of potential priority 6 would have a minor negative effect on the SA objectives of 1a) Climate Change mitigation and 2c) air quality. However, at this stage it does not take account of the location of the planned housing which could have a significant influence on the nature of the impact of development on these SA objectives; the degree to which the delivery of housing has a positive or negative impact on these SA objectives will be largely determined by the proposed locations for growth. It is unclear how the SA has quantified the impact of potential priority 6 on SA objectives 1a) and 2c) at this stage without knowledge of the planned locations.</p>	10 Mar 2021

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	<p>In respect of the appraisal of the Building Blocks, paragraphs 4.37 and 4.38 identify some potential negative effects of noise, pollution and congestion associated with additional development at or adjoining the Bristol North Fringe and East Fringe (Building Blocks 1 and 2), resulting in an uncertain minor negative effect on SA objectives 2b (Noise) and 2c (Air Quality). However, development at market towns and rural settlements (Building Blocks 3 and 4) is expected to perform marginally better against these criteria despite the likelihood of encouraging lengthier journeys, particularly for market towns to the North of the District.</p> <p>Whilst it is acknowledged that the Bristol urban fringes are already faced with congestion, pollution and noise constraints, significant contributing factors are:</p> <ol style="list-style-type: none"> <li>1) The reliance on diesel and petrol powered vehicles; and</li> <li>2) The imbalance of employment and resident workers in these areas of the City.</li> </ol> <p>The Local Plan acknowledges the need to redress this imbalance through the introduction of additional homes close to major employment areas. The introduction of electric cars should also reduce pollution during the Plan Period, whilst the delivery of new homes close to the existing urban areas would encourage further trips to be taken by foot, cycle or Public Transport, thereby reducing the length and frequency of journeys by private motor vehicles. Taking these factors in account, the net effect of Building Blocks 1 and 2 on SA objectives 2b and 2c should present more positive outcomes than currently indicated by Table 4.4.</p> <p>Paragraph 4.42 considers the impact of Building Blocks 1 and 2 on the provision of public open space. It highlights the existing connectivity issues and physical barriers presented by major roads in existing urban areas, together with the need for investment in open space. As a result, a mixed, minor positive and minor negative effect is recorded against objective 2a, whilst Building Blocks 3, 4 and 5 are attributed a positive effect on objective 2a due to the availability or potential provision of public open space.</p> <p>The SA should recognise that Building Block 2 could provide opportunities to unlock existing barriers, establish new connections between existing urban areas and provide access to or provision of new/existing public open space and sports facilities. The connectivity issues highlighted by the SA could be resolved through the development of undeveloped land within the Green Belt and Bristol North Fringe.</p> <p>In this regard, we are encouraged by paragraph 4.57 of the SA which acknowledges the opportunities presented through new development to positively incorporate Green Infrastructure; significant positive effects are expected in respect of Building Block 2 SA objective 5e) Green Infrastructure.</p> <p>We support the overall recommendations at paragraph 4.65 and 4.66 which set out the approach to be taken to appraising suitable development options within the Green Belt through Building Block 2. In addition to addressing the current imbalance of jobs and homes and the capacity of services and facilities, the Local Plan should also consider the potential of development to enhance connections between existing urban areas,</p>	

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	services and facilities, particularly through the delivery of green infrastructure corridors which could encourage walking and cycling to the wider benefit of the area.	
Fi Riches	Whilst a good idea in theory - how many man hours are spent stating, in most cases, the bleeding obvious.	09 Dec 2020
Hannah Saunders - Dodington Parish Council	<p>Sustainability Appraisal/Scoping Report:</p> <p>Members looked at the evidence base that had been used and information that had been gathered in order to produce Phase 1 Issues &amp; Approaches document.</p> <p>After due consideration it was agreed that the Parish Council were not in a position to comment further on this. They understand that when the Plan is inspected – this area will be scrutinised... and the Parish Council are satisfied with that.</p> <p>Members recognise that some of the ‘key evidence’ (as stated on P14) is still under development. Dodington Parish Council have commented extensively and played an active role with the Yate Town Improvement Masterplan consultation. As such, the comments submitted last year are attached alongside these comments for your info.</p> <p>Members are keen to know how the timelines of these developing studies are going to fit into the Local Plan going forward.</p>	25 May 2021
Ivywell Capital (IC)	<p>7. SUSTAINABILITY APPRAISAL FOR THE PHASE 1 DOCUMENT:</p> <p>7.1 There does not appear to be a specific set of questions relating to the Sustainability Appraisal for the Phase 1 document. However, we have made some general observations below, principally in respect of the approach to the Green Belt.</p> <p>7.2 Paragraph 3.27 acknowledges Green Belt as a planning consideration, but not a specific sustainability issue that needs to be addressed through the SA. Indeed, the Green Belt designation and desire to protect it is often a barrier to delivering sustainable development. Where Green Belt constrains development around an urban area with development pressures, development is simply pushed further away from the centre leading to longer commuting times, dormitory settlements, and less sustainable patterns of development.</p> <p>7.3 Furthermore, Green Belt land is often among the most sustainably located land within a District and its release has the potential to make a significantly greater contribution to the wider objectives and guiding principles of the Plan.</p> <p>7.4 We understand that the Council has included the protection of the Green Belt as an objective to be assessed through the SA, with a view to understanding how the various building blocks would contribute to its protection. However, it is important that any SA of development options needs to be 'policy off' in Green Belt terms because whether land is or is not designated as such is essentially irrelevant in sustainability terms.</p> <p>7.5 This is why we have concerns with the SA's conclusion that the loss of Green Belt land may have a minor adverse impact in sustainability terms on the basis that it supports the optimisation of development density and Brownfield sites (paragraph</p>	17 May 2021

Respondent Name	User Response: Text	Response Created
	<p>4.18). It is our view that Green Belt releases are only considered once all other reasonable alternatives have been considered, including how development within existing urban areas can be maximised. As such, whether Green Belt land is released or not, has no real bearing on the extent to which Brownfield sites are maximised.</p> <p>7.6 This is not to say that Green Belt land should not be protected. National Policy is clear in that Green Belt boundaries should only be altered where exceptional circumstances can be demonstrated. However, the development of Green Belt land is not inherently more or less sustainable than the development of non-Green Belt land and so it should not factor into the SA.</p> <p>7.7 The significant adverse impacts of the five building blocks to the Green Belt identified in Table 4.4 of the SA are essentially irrelevant for the purposes of assessing sustainability.</p> <p>7.8 This is also the case at Table 4.7 which summarises the sustainability effects of options for growth at rural communities in the context of the Green Belt. The fact that Option 2 would have a significant adverse impact on the Green Belt, compared with a minor positive impact of Option 1 is irrelevant for the purpose of the Sustainability Appraisal. What is important is that Option 2 performs as well or better against all of the other SA objectives.</p> <p>7.9 That said, it does not appear that the consideration of impacts to the Green Belt have affected the SA's recommendations and we note its support for the exploration of Green Belt releases to meet the District's development needs.</p>	
James Carpenter - Falfield Parish Council	<p>Table 4.4.</p> <p>Disagree 1a for BB5 is ++/-- Climate Change. Disagree with significant positive as remote satellite villages will increase travelling to the main town and city centres. Employment in a new settlement will be limited and cannot cater for all skill sets and careers like a city centre. (4.41)</p> <p>Disagree 2c for BB5 is ++/-- air quality. Disagree with significant positive as remote satellite villages will increase travelling to the main town and city centres. Employment in a new settlement will be limited and cannot cater for all skill sets and careers like a city centre. (4.41)</p> <p>Disagree 2d for BB5 is ++/-- access to healthcare. How can a place which does not exist be given a double positive for an unknown access to healthcare? It should be ?/--. A location on the edge of the County would be severely remote from regional A&amp;E facilities. (4.47)</p> <p>Disagree 5e for BB5 is ++? for green infrastructure. This should be --. Losing green fields to development cannot be seen as a positive. What if that new settlement is in an area of the region's green infrastructure, it would be a massive loss of green infrastructure.</p> <p>Table 4.6. The market town of Chipping Sodbury should be added to this list.</p>	13 Apr 2021

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	<p>Some of the appendix maps are illegible, poor quality and pixelated. You cannot zoom into them to look at them in more detail or identify a particular place.</p> <p>Appendix 4 table. 5g loss of productive land. There is no uncertainty in the loss of Grade 3 agricultural land. We need to make the most of our good quality land for growing food locally. This grade land is efficient at growing crops per square metre, it cannot be replaced. It is a Significant Negative.</p> <p>Appendix 4 table 7a. Protect and enhance valuable Green Belt.</p> <p>This is not necessarily a significant negative. The Belt could potentially be expanded outwards along the outer edges freeing up strips of developable land on the inside but with no total loss of Green Belt area, it could be reallocated.</p>	
Julia Bernau	As wide a number of people as possible need to be involved.	04 Feb 2021
Lesley Brown	<p>Stage A: Scoping:</p> <p>2.2 states that "previous Local Plan Sustainability Appraisals provided the starting point for the development of the SA objectives for the Local Plan 2020." It seems that the inaccuracies that had previously been pointed out during consultations had not been corrected in the SAs meaning that the information contained in the DAPs are still inaccurate.</p> <p>2.10 I am pleased to see that if an equal number of positives and negatives are identified public opinion and conformity with NPP will be taken into account.</p> <p>4. Sustainability Appraisal findings for the policy options:</p> <p>4.54 Building Block 4 says that development has the potential to impact on SSSIs. However, 2 of those mentioned - Winterbourne Railway Cutting and Barnhill Quarry are already close to housing.</p> <p>Options for growth at rural communities in the context of the Green Belt:</p> <p>4.107 This puts forward sites identified during previous Calls for Sites, up to 200 metres from urban areas. Surely if a site is so close to an urban area this risks potential coalescence - i.e. the site becoming part of urban sprawl which Green Belt is designed to prevent.</p> <p>4.113 Option 1. Coalpit Heath is listed as one of the areas outside of the Green Belt which is incorrect as it is within the Green Belt.</p> <p>4.122 SA objective 5a/5b historic environment fails to mention the Coalpit Heath Scheduled Monument at Ram Hill Colliery.</p> <p>4.126 It is recommended that building both within and outside of the Green Belt be taken forward. To some extent I think this conflicts with the aim of asking the public for their views. People could have come to their own conclusions but this feels as</p>	21 Feb 2021

Respondent Name	User Response: Text	Response Created
	<p>though the Planners have already decided which path to take.</p> <p>Appendix 2:</p> <p>Economic development:</p> <p>The Employment type table shows a grand total loss of 9,400 sqm office space. I would suggest that this doesn't have such significance due to the current trend of home working. Some employers are already talking in terms of continuing this mode of working into the future and are minimising their use of office space.</p> <p>Access to services and facilities:</p> <p>The SAPs which have provided the basis for the current DAPs were inaccurate in many areas. Although this was pointed out during the 2018 consultation, the Profiles have not been corrected. It is important that these are corrected and republished before any decisions of where housing should go are made.</p>	
Lynette Thoburn-Perrett	Wickwar has few amenities and very poor infrastructure making it an unsuitable location for development.	25 Feb 2021
Mr. A. D. England	<p>7.13 The Local Plan 2020 Phase 1 Sustainability Appraisal recognises that Almondsbury's access to facilities and amenities and its location on the urban fringe of Bristol means that directing further housing here can assist with Climate Change mitigation:</p> <p>Option 2 directs small to medium-scale growth to locations within as well as outside the Green Belt and therefore includes a wider range of villages and settlements across South Gloucestershire. However, as with Option 1, there is also offers varying levels of access to key services/facilities. Significant positive effects are identified for this approach in relation to SA objective 1a: Climate Change mitigation and the access related objectives (SA objectives 2d and 3c/3d/3e). This reflects the higher number of well-connected locations being identified between the urban fringes of Bristol and the market towns of Yate and Thornbury, compared to the locations outside of the Green Belt in Option 1 in the North and East of the District. Locations included in Option 2 which would help achieve benefits relating to good access and Climate Change mitigation include Almondsbury, Alveston, Hambrook and Longwell Green. These locations have relatively good existing service provision and are located on key bus routes.”</p> <p>(Para 4.114, Phase 1 Sustainability Appraisal, November 2020: emphasis added)</p> <p>7.14 As previously mentioned, it is clearly evident that a proportion of the 59 settlements listed for review are relatively isolated with limited facilities. Development at these locations could cause detrimental harm and therefore it is critical that the SA process is used to inform and eliminate such settlements from further review due to their lack of sustainable accessibility.</p>	29 Mar 2021
Newland Homes - Land at Aust Road	7.1 There does not appear to be a specific set of questions relating to the Sustainability Appraisal for the Phase 1 document. However, we have made some general observations below, principally in respect of the approach to the Green Belt.	14 May 2021

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	<p>7.2 Paragraph 3.27 acknowledges Green Belt as a planning consideration, but not a specific sustainability issue that needs to be addressed through the SA. Indeed, the Green Belt designation and desire to protect it is often a barrier to delivering sustainable development. Where Green Belt constrains development around an urban area with development pressures, development is simply pushed further away from the centre leading to longer commuting times, dormitory settlements, and less sustainable patterns of development.</p> <p>7.3 Furthermore, Green Belt land is often among the most sustainably located land within a District and its release has the potential to make a significantly greater contribution to the wider objectives and guiding principles of the Plan.</p> <p>7.4 We understand that the Council has included the protection of the Green Belt as an objective to be assessed through the SA, with a view to understanding how the various building blocks would contribute to its protection. However, it is important that any SA of development options needs to be 'policy off' in Green Belt terms because whether land is or is not designated as such is essentially irrelevant in sustainability terms.</p> <p>7.5 This is why we have concerns with the SA's conclusion that the loss of Green Belt land may have a minor adverse impact in sustainability terms on the basis that it supports the optimisation of development density and Brownfield sites (paragraph 4.18). It is our view that Green Belt releases are only considered once all other reasonable alternatives have been considered, including how development within existing urban areas can be maximised. As such, whether Green Belt land is released or not, has no real bearing on the extent to which Brownfield sites are maximised.</p> <p>7.6 This is not to say that Green Belt land should not be protected. National Policy is clear in that Green Belt boundaries should only be altered where exceptional circumstances can be demonstrated. However, the development of Green Belt land is not inherently more or less sustainable than the development of non-Green Belt land and so it should not factor into the SA.</p> <p>7.7 The significant adverse impacts of the five building blocks to the Green Belt identified in Table 4.4 of the SA are essentially irrelevant for the purposes of assessing sustainability.</p> <p>7.8 This is also the case at Table 4.7 which summarises the sustainability effects of options for growth at rural communities in the context of the Green Belt. The fact that Option 2 would have a significant adverse impact on the Green Belt, compared with a minor positive impact of Option 1 is irrelevant for the purpose of the Sustainability Appraisal. What is important is that Option 2 performs as well or better against all of the other SA objectives.</p> <p>7.9 That said, it does not appear that the consideration of impacts to the Green Belt have affected the SA's recommendations and we note its support for the exploration of Green Belt releases to meet the District's development needs.</p>	

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	<p>7.10 Green Belt matters aside, we are also slightly concerned that in assessing the building blocks, significant adverse impacts have been noted on the basis of development coming forward in relatively specific locations. For example, we note that a significant adverse impact has been noted for development at Market Towns on the basis that development around Thornbury would lead to the loss of Grade 2 agricultural land (paragraph 4.58). However, land around other market towns (such as Yate) is generally poorer quality and so a strategy which sought to bring development forward at Yate but not Thornbury would have a lesser impact. We would expect the SA to be updated to reflect this as the spatial distribution strategy develops.</p>	
<p>Newland Homes - Land West of The B4061 Bristol Road</p>	<p>7. SUSTAINABILITY APPRAISAL FOR THE PHASE 1 DOCUMENT:</p> <p>7.1 There does not appear to be a specific set of questions relating to the Sustainability Appraisal for the Phase 1 document. However, we have made some general observations below, principally in respect of the approach to the Green Belt.</p> <p>7.2 Paragraph 3.27 acknowledges Green Belt as a planning consideration, but not a specific sustainability issue that needs to be addressed through the SA. Indeed, the Green Belt designation and desire to protect it is often a barrier to delivering sustainable development. Where Green Belt constrains development around an urban area with development pressures, development is simply pushed further away from the centre leading to longer commuting times, dormitory settlements, and less sustainable patterns of development.</p> <p>7.3 Furthermore, Green Belt land is often among the most sustainably located land within a District and its release has the potential to make a significantly greater contribution to the wider objectives and guiding principles of the Plan.</p> <p>7.4 We understand that the Council has included the protection of the Green Belt as an objective to be assessed through the SA, with a view to understanding how the various building blocks would contribute to its protection. However, it is important that any SA of development options needs to be 'policy off' in Green Belt terms because whether land is or is not designated as such is essentially irrelevant in sustainability terms.</p> <p>7.5 This is why we have concerns with the SA's conclusion that the loss of Green Belt land may have a minor adverse impact in sustainability terms on the basis that it supports the optimisation of development density and Brownfield sites (paragraph 4.18). It is our view that Green Belt releases are only considered once all other reasonable alternatives have been considered, including how development within existing urban areas can be maximised. As such, whether Green Belt land is released or not, has no real bearing on the extent to which Brownfield sites are maximised.</p> <p>7.6 This is not to say that Green Belt land should not be protected. National Policy is clear in that Green Belt boundaries should only be altered where exceptional circumstances can be demonstrated. However, the development of Green Belt land is not inherently more or less sustainable than the development of non-Green Belt land and so it should not factor into the SA.</p> <p>7.7 The significant adverse impacts of the five building blocks to the Green Belt</p>	<p>14 May 2021</p>

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	<p>identified in Table 4.4 of the SA are essentially irrelevant for the purposes of assessing sustainability.</p> <p>7.8 This is also the case at Table 4.7 which summarises the sustainability effects of options for growth at rural communities in the context of the Green Belt. The fact that Option 2 would have a significant adverse impact on the Green Belt, compared with a minor positive impact of Option 1 is irrelevant for the purpose of the Sustainability Appraisal. What is important is that Option 2 performs as well or better against all of the other SA objectives.</p> <p>7.9 That said, it does not appear that the consideration of impacts to the Green Belt have affected the SA's recommendations and we note its support for the exploration of Green Belt releases to meet the District's development needs.</p> <p>7.10 Green Belt matters aside, we are also slightly concerned that in assessing the building blocks, significant adverse impacts have been noted on the basis of development coming forward in relatively specific locations. For example, we note that a significant adverse impact has been noted for development at Market Towns on the basis that development around Thornbury would lead to the loss of Grade 2 agricultural land (paragraph 4.58). However, land around other market towns (such as Yate) is generally poorer quality and so a strategy which sought to bring development forward at Yate but not Thornbury would have a lesser impact. We would expect the SA to be updated to reflect this as the spatial distribution strategy develops.</p>	
R. Brown	<p>Stage A - Scoping:</p> <p>Para 2.2 states 'previous Local Plan Sustainability Appraisals provided the starting point for the development of the SA objectives for the Local Plan 2020.' There were many errors in the previous Plan that were pointed out during the consultation that have not been corrected. So the Appraisal is still wrong and could result in developments being built that cause more problems to the communities, infrastructure and environment.</p> <p>4. Sustainability Appraisal findings for the policy options.</p> <p>In 4.54 Building Block 4 it states developments have the potential to impact on SSSIs. Winterbourne Railway Cuttings and the Barnhill Quarry Sites are already close to existing housing. IN the Case of Winterbourne it is totally surrounded by housing.</p> <p>Option for growth at rural communities in the context of the Green Belt:</p> <p>4.107 This identified sites from previous Call for Sites up to 200 metres from urban areas. Sites this close could result in merging with the existing housing and result in urban sprawl. The Green Belt is designed to prevent this.</p> <p>4.113 Option 1. Coalpit Heath is listed as outside the Green Belt. It is actually inside the Green Belt. The mistake needs to be corrected.</p> <p>4.122 The SA Objective 5a and 5b historic environment does not include the Scheduled Monument at Ram Hill Colliery in Coalpit Heath.</p>	27 Feb 2021

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	<p>Appendix 2:</p> <p>Economic development:</p> <p>The employment type table shows a loss of 9,400 square meters of office space. With the implementation of home working which has been accelerated due to Covid the need for office space will be reduced as more employers see the benefits of this. I work for a major employer in Bristol and South Gloucester and the company has decided not to return to office based working. The savings on office costs i.e. rent, power, Business Rates etc. Has encouraged the business to adopt this new working practice.</p> <p>Access to services and facilities:</p> <p>The SAPs that provides the data for the present DAPs have many errors in various areas. This was pointed out at the 2018 consultation but the Profiles have not been corrected. It is essential these are corrected and published before any decisions are made for the location of new housing. This information is flawed and could result in housing being built in unsuitable locations causing detrimental affects on the residents, infrastructure and the environment.</p>	
Rebecca Woodward	<p>Sustainable development has to be at the core of this strategy. Whilst appreciating housing numbers are required, surely it is also nature and location. Emphasis on affordability is essential and continuing to build high end developments with minimal affordable housing has to stop. This is destroying our countryside and impacting on rural communities. Car dependent developments should be refused. Bradley Stoke surely was a sultry recent example of what happens when houses are built in an unsupported and unsustainable manner. Our rural roads are becoming increasingly congested. Requiring traffic calming measures to be adopted which further destroy the nature of rural communities. Not every residential area has to be large, amorphous and devoid of green space.</p>	28 Feb 2021
Redrow Homes (SW)	<p>3.2 The sustainability Appraisal work that has been undertaken by Land Use Consultants (LUC) is starting to take the form of an assessment process that can appropriately guide the Council in selecting such a strategy, albeit the interrelationship with the WoE SDS needs careful consideration.</p> <p>3.3 As we have set out in previous reps to the JSP, and as part of our separate submissions to the SGLP Phase 1 document, we consider it essential for legibility that a weighting system be applied to the SA assessment to aide legibility for the general public. If this is done and accepting the SA conclusions in respect of the 5 'building blocks' the most sustainable options for development include the reuse of underused land within existing urban areas, followed by urban extension to Bristol, as Figure 2 below illustrates:</p> <p>Figure 2. Assessment of 'Building Blocks' SA work with weighted system applied.</p> <p>Please see the attached document for Figure 2 (as referenced above).</p>	29 Apr 2021

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	<p>6.2 We acknowledge that the SA/SEA process is complex and needs to meet certain regulations for it to be legally compliant. However, concerns remain that at the moment the document presented, whilst headed in the right direction, is still overly complicated and confusing to the general reader. The process being adopted in the SDS is far more simplified and we feel it would help SGC make decisions about where to locate development if this approach were adopted as part of the Local Plan preparation.</p>	
Richard Bentham	<p>There is lots of mention of improving air quality, reducing the reliance on the private car, balancing development with increased congestion etc, but your solutions make no mention of motorcycles/scooters!</p> <p>Please promote motorcycles as a mode of efficient, low pollution, less congested commuting. Your analysis does not mention them. Not good enough! Provide secure parking &amp; promote awareness with roadside poster campaign. Your report often states the commuting/shopping distances are too far or difficult to walk. Cycling is suitable for some people travelling a few miles. Not everyone is able to cycle.</p> <p>The Ring Road is very congested with cars, people are reluctant to use Public Transport with the virus, the cycle path has a poor crime record in East Bristol.</p> <p>Motorcycles are a quick win to reduce emissions &amp; congestion. With new development looking to reduce car parking then more 2 wheelers instead of cars can achieve this.</p>	04 Feb 2021
Richard Walker - Lightwood Strategic	<p>SA Objective 4a:</p> <p>3.2 It is ill conceived to attribute a significant positive effect on development that provides 1ha of employment land. On this basis a 3,000-unit new settlement would get a significant positive score for only planning for 1ha of employment land. The effect of this will be to automatically externalise many travel to work trips.</p> <p>3.3 More thought is needed and standalone employment land needs to be considered differently to employment land in mixed use sites.</p> <p>3.4 The evaluation system is probably ok for stand-alone sites, but we suggest that a ratio-based approach is needed for Buckover and Charfield. If the ratio of employment land/jobs to housing is too low then the gross benefits of providing ‘some’ land will be undone by the net externalities of offsite travel. A two staged approach is needed for these large mixed use sites/locations. The gross effect should be assessed but the net effect should also be assessed on this basis of a jobs per home gradation system. It especially important to apply this think to sites far furthest from key employment areas. Urban fringe or market town locations can access pre-existing employment land with fewer Carbon emissions.</p> <p>SA Objective 4b:</p> <p>3.5 There is a mismatch between the Accessibility profiling methodology (see our Part 2 comments) and the Sustainability Appraisal methodology in respect of bus travel. It’s confusing to have two separate standards. One would think that the purpose of the</p>	01 Jun 2021

Respondent Name	User Response: Text	Response Created
	<p>accessibility profiling was to provide the evidence base for the SA but the findings do not translate.</p> <p>3.6 The former adopts a five-point scale with four 15-minute performance bands, and a fifth band, that signifies non-compliance with the minimum 60-minute standard of the fairly recently adopted Policies Sites and Places Plan (2017). The threshold can be pinned to the adopted Development Plan which is helpful, and this has been tested at Examination. A colour coding system of dark green, light green, orange and red is used to signify performance with the 60-minute threshold, and cells are greyed where this cannot be achieved.</p> <p>3.7 The SA framework adopts a three-point scale that is contained within a 40-minute threshold period, with a fourth scale point capturing travel times over a 40 minute as opposed to a 60 mins threshold. Sites with a 41-minute travel time would be assessed the same as those with an 80-minute travel time, which seems extreme. A 20-minute travel time equates to a major positive effect/performance. Further 10-minute intervals are applied to indicate other effects/performance ratings. 30 mins equates to a major negative rating and 40 minutes to a 'minor negative rating. In excess of 40 mins is assessed as major negative.</p> <p>3.8 The Council needs to pick a consistent scale and threshold to evaluate Spatial Strategy and site options. The SA has to be fed by the Council's access profiling.</p> <p>3.9 To combine approaches the following scale should be used, and the assessment should also have regard to relative performance versus car travel times during rush hour and costs. For example, a 41-minute bus trip (and its season ticket prices) using bus lanes may be comparable with car travel time, with fuel and parking costs (and in the future no clean air zone costs re: the Centre of Bristol). Commuters make choice based on relatively in term of time, reliability and cost.</p> <p>3.10 The combined approach balances to propensity for slightly longer trips (time) to be more acceptable for commuting trips, especially to major employment hubs, that access to more local services. At present the SA framework applies the same performance regime to determine for all land uses.</p> <p>? 20 minutes or less - major positive.</p> <p>? 35 minutes or less - minor positive.</p> <p>? 50 minutes or less - minor negative.</p> <p>? Over 50mins + major negative. Where sites fall in this bracket the actual time should still be recorded to be able to distinguish between sites/locations that perform really very badly and those that are just beyond the threshold.</p> <p>3.11 In respect of major employment locations, it is not very clever if a location/site is to be assessed in an SA context solely on the basis of its accessibility to at least the nearest existing or planned major employment centre (which is daft), or whether a braider will be undertaken based on accessibility to the full range of key employment</p>	

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	<p>locations. This approach would be more in-line with the Council’s accessibility profiling and enables a global/composite understanding.</p> <p>3.12 Notwithstanding, a major problem with the proposed methodology for assessing the accessibility credentials of sites in the SA is that it does not actually capture the likely residual tailpipe Carbon emission of locations. We have rehearsed this issue in Parts 1 and 2 of our representations. Without this measurable data, the SA does not actually capture a key data source. It is not for the SA to generate this data but it needs to be provided to it by the Council or the WECA.</p> <p>3.13 Thus, whereas the ‘effects criteria’ for site appraisal work (Appendix 4 of the November 2020 SA) notes, in respect of SA Objective 1 (Climate Change), that NB: Greenhouse Gas emissions associated with travel were covered under another SA objective, the SA framework, by virtue of its methodology does not actually achieve this. All it does is assess accessibility by Public Transport, but that is not the same thing as assessing Greenhouse Gas emissions with a site. This can only be determined by looking at the residual car-based trips, using a method similar to that deployed by Calibro consultants in South Oxfordshire. By this method one can assess the Carbon emissions performance of a location on a like for like (per trip basis). With this information hand one can then assess the performance of a site of 100, 300, or 1,000 etc in any given location.</p> <p>3.14 Whatever, the walking, cycling, Public Transport options/timings availability the car will remain the key source of travel. Transition to a fully electric fleet will take a very long time, even with the electric share of the new sales market increasing year on year. By 2030, the Council's target date for zero Carbon the share of the fleet that is petrol/diesel will still be very high.</p> <p>3.15 Focusing, on residual tailpipe Carbon emissions for travel to work trips as an indicator of a site's Carbon sustainability provides the Council (Officer and Councillors) with actual data on the actual Carbon credentials of those sites. At present neither the Access profiling nor the SA approach gives the Council that information. It’s the residual car-based trips, as a mode share and critically in relations to distance to be travelled to reach the same strategic suite of job opportunities that generates the Carbon data that is needed to inform the Plan and the SDS. Please see the report linked at para 1.9 of these representations.</p> <p>SA Objective 5c:</p> <p>3.16 This relates to ecology. It will be law, by that time that Applications are determined, for 10% Biodiversity net gain to be achieved, thus the potential for negative effects should only be recorded if this cannot in principle be achieved. The GIS/distance-based system of 5c regarding ecology is lazy compared to the analytical and discussive method of 5b re: heritage.</p> <p>SA Objective 5g:</p> <p>3.17 This Objective relates to agricultural land ‘Significant Negative’ effect is reserved for Grades 1 and 2 only, but 3a is also best and most versatile agricultural</p>	

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	<p>land. There is no distinction the national policy approach.</p> <p>3.18 3a and 3b need to be separated with 3b receiving a minor negative effect. The Council needs to ask landowner/developers to survey to prove their grading. At present approach manipulates the SA process so that some 3a areas that were identified in the JSP are not given a different score to 3b areas.</p> <p>3.19 We agree with the approach for Grade 4 and 5.</p> <p>SA Objective 7a:</p> <p>3.20 Green Belt should not be an SA objective. It is another layer of policy consideration, with a Green Belt review to be read alongside the SA. A composite Plan-making assessment will be needed but not in the SA itself. The NPPF requires that first consideration be given to Green Belt locations that are or can be well served by Public Transport as opposed to locations that would have the least harm on Green Belt purposes. Public Transport services are essentially a proxy for focused on the most satiable locations in respect of fewest per trip Carbon emissions.</p>	
Rohan Torkildsen - Historic England	<p>Evidence has shown the reuse of Brownfield, underutilised or unsightly sites within historic places can reknit a fragmented historic settlement and positively reinforce the attributes of that historic place providing a more suitable alternative to sprawl. Cathedral Cities in Peril (Foster and Partners/Historic England/Terence O'Rourke 2015) is perhaps worthy of reference. Presently your Sustainability Appraisal suggests a negative effect associated with this form of development; that needn't be the case.</p>	10 Mar 2021
Sophia Rees - B N P Paribas Real Estate	<p>Further depth of Green Belt review and development in flood defence areas.</p>	01 Mar 2021
South West Strategic Developments (SWSD)	<p>Please see submitted representations 354 A3 CC 010321 FINAL SGLP Reps –Woodlands Garden Community. This statement should be read as a whole but in particular Sections 4 and 5 are of most relevance to the SA.</p> <p>4.7 In our view, and as we set out in representations to the JSP, the various Spatial Strategies that the evidence base and SA connected to the JSP examined, were not necessarily the wrong options nor was the analysis of those spatial options fundamentally incorrect.</p> <p>4.8 In respect of the Spatial Strategies that WECA assessed, all that was required was a sensible way of weighting the various objectives that the SA assessed. We did this and presented it in our evidence, as set out in Figure 2 below. It can be seen from this table that if the WECA conclusions are accepted there was a clear 'winner' in terms of the Spatial Strategy that should have been selected.</p> <p>(Please see the attached document for Figure 2)</p> <p>Figure 2. Comparison of Spatial Scenarios from Issues and Options Stage, using numbered scoring system</p> <p>4.9 This clearly identified that concentration at the Bristol Urban Area was the</p>	31 Mar 2021

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	<p>optimal Spatial Strategy in sustainability terms, even if the WoE Authorities’ own assessments were accepted and not challenged in any way. For this, and other reasons we will go on to explain, we consider that the SDS and SGLP should be considering this Spatial Strategy as the primary option for accommodating growth, unless circumstances have changed to justify a different approach being taken. However, in our view, since the SA was undertaken as part of the JSP process, circumstances such as the Climate Change emergency and behavioural and economic patterns caused by the pandemic add further weight to the proposition that this strategy was and remains the optimal one.</p> <p>5.0 THE SUSTAINABILITY APPRAISAL:</p> <p>5.1 There were significant issues with the Sustainability Appraisal that supported the JSP. The primary issue was that the detailed version was undertaken after the Spatial Strategy and certain sites were selected, meaning that the strategy was clearly pre-determined and not justified by the evidence base.</p> <p>5.2 We are pleased to see that the Issues and Approaches consultation document is accompanied by two SA Reports which indicates that this is being considered at an early stage within the Plan-making process. One report has been prepared by SGC, the other undertaken by Land Use Consultants (LUC). The SGC report represented an early scoping report that was intended to set the context and objectives of the SA and establish the baseline of this assessment.</p> <p>5.3 The LUC report further develops this baseline and attempts to provide a SA assessment of the ‘Building Block’ strategy options that the Local Plan is considering, set against the identified 9 key priorities that the SGC scoping document established. As we have set out in the previous sections of this statement, we have questioned whether it is appropriate that these are determined at the Local Plan, rather than SDS level, as these are in effect Spatial Strategies. Notwithstanding this, we have examined both SA Reports in detail and have some comments and concerns in respect of the following key issues.</p> <p>5.4 We have been monitoring the progress of the SDS alongside the SGLP. A new joint SA was published by Atkins &amp; LUC in October 2020 and we note that the methodology has been simplified. An extract of this is shown below:</p> <p>(Please see the attached document for Figure 3)</p> <p>Figure 3. Extract of the IIA Framework proposed in support of the Spatial Development Strategy</p> <p>5.5 This is much easier to understand for the general reader compared to the scoring key replicated below in Figure 4 and we question why this approach couldn’t be used for the SGLP.</p> <p>5.6 Paragraph 2.10 of the LUC Report states:</p> <p>“The SA findings are not the only factors taken into account when selecting options to</p>	

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	<p>take forward in a Plan. Indeed, there will often be an equal number of positive or negative effects identified for each option, such that it is not possible to ‘rank’ them based on sustainability performance in order to select an option.”</p> <p>5.7 We disagree with this statement for several reasons. As we previously demonstrated as part of our evidence connected to the JSP, it is possible to provide a ranking system by applying a simple weighting value to each of the effects identified as part of Figure 2.1 of the LUC report. This will then give a weighting to each scenario that is easy for the public to relate to. There is no reason not to present a ranked system in the way we describe, otherwise we question why to rate each effect in the terms (+ or -) in any event.</p> <p>(Please see the attached document for Figure 4)</p> <p>Figure 4. Illustration of a potential weighting system that could be applied to SA assessment</p> <p>5.8 On a slightly separate note, from Table 4.4 of the report which is replicated below, with the exception of including our weighted system, it appears that the SA has begun to slip back into the more complicated scoring process used in the JSP by incorporating other symbols which aren’t set out in the Scoring Key. For example, there is now ++/-- used, as well as -- ?, and symbols mixed up the wrong way (i.e. +/-). We appreciate that the SA process isn’t a simple task and there will be a mixture of effects, but there is no doubt that this method contributes to confusion and could easily be simplified.</p> <p>5.9 By applying the simple weighting we have discussed, one gets a clearer understanding of the optimal development scenarios that are available. The SA assessment, with our weighted system, is set out in Figure 5 below:</p> <p>(Please see the attached document for Figure 5)</p> <p>Figure 5. Assessment of ‘Building Blocks’ SA work with weighted system applied</p> <p>5.10 The SA should inform the Plan-making process and Planning Practice Guidance (PPG) quite clearly states that ‘sustainability appraisal is integral to the preparation and development of a Local Plan’ (Para: 006, Ref ID: 11-006-20140306), and ‘[the sustainability appraisal] should inform the selection, refinement and publication of proposals (when preparing a Local Plan, paragraph 152 of the NPPF should be considered)’ (Para: 018, Ref ID: 11-018-20140306).</p> <p>5.11 The above clearly demonstrates that again, following the intensification of urban areas (Building Block 1), urban extensions to Bristol (Building Block 2) would be the most sustainable option for growth and should receive the highest proportion of housing growth. WGC neatly fits in with this strategy and therefore should at least be a preferred option for consideration in the next stage of the SGLP preparation.</p> <p>5.12 Returning back to paragraph 2.10 of the LUC Report, this goes on further to state:</p>	

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	<p>“Factors such as public opinion, deliverability, and conformity with national policy will also be taken into account by Plan-makers when selecting options for their Plan.”</p> <p>5.13 After setting out that Building Blocks 1 and 2 are the most sustainable options to pursue in SA terms SGC may then bring in other Plan-making decisions which can influence the selection of policies and sites and set out the clear reasons for doing so. If the other factors that para 2.10 of the LUC report references above justify why the highest ranked option has not been pursued these can then be set out in clear and understandable terms.</p> <p>5.14 However, we would question why public opinion on its own would be a reason to ignore the most sustainable strategy; often development is unpopular and simply saying that negative public opinion could sway such decision making is very concerning, given the need to select the most sustainable strategy in the context of the declared Climate Change emergency. We urge SGC to ensure that, whilst taking public opinion into account in defining a strategy, this will not be the sole defining factor for determining growth for the next 20 years in the sub-region. Notwithstanding our above conclusion on this matter, it should be noted that during the JSP process there appeared to be limited public objection to the proposals for WGC.</p> <p>5.15 We are concerned that other influences are already coming into the SA process, with the LUC Report stating ‘in some instances, the appraisal of policy options reflects other factors which are of relevance in relation to the achievement of an SA objective but which falls outside of the scope of the site assessment effects criteria.’ It is therefore unclear whether the SA has been influenced by other decisions that the reader doesn’t know about; the SA should be an independent, objective assessment with a clear set of criteria that proposals are assessed against and we would welcome confirmation in the next stage of the process what these criterion were.</p> <p>5.16 For example, paragraph 2.23 of the LUC SA Report states that ‘the reasonable alternative policy options for the Local Plan have been appraised against the SA objectives in the SA Framework.’ However, we then go on to note that it states in paragraph 2.30 that ‘as site options and allocations will only be considered at a later stage in the Plan preparation process and have not been considered for the Local Plan 2020 Phase 1 document, the criteria have not been used for the appraisal work included in this SA Report.’ Whilst we appreciate this, there is then no explanation of how the Phase 1 document has been assessed against the sustainability objectives, and as such, this leads us to question how the SA work undertaken by LUC could have assessed the effects of the policy options presented in the Local Plan Phase 1 document, other than via subjective assessments. Again, this is perhaps the most reasonable approach, but we need to know how far these assessments have been influenced by outside factors.</p> <p>5.17 There are then some more specific points about the Framework and the ‘effect criteria’ set out. Table 5A of the South Gloucestershire Scoping Report sets out the objectives and effects that will be used, albeit we note that in several instances these are still yet to be fixed, and on certain pages the tables have printed incorrectly and can’t be viewed in full. We query why these are yet to be confirmed, particularly as</p>	

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	<p>this information is very similar to the SA Scoping Report that was published in 2018 as part of the original Local Plan Review that was being undertaken in conjunction with the JSP. For example, the effect criteria of Objectives 1a, 1b, 2c, 3a, 5b, 5d, and 7a are all yet to be confirmed and there also appears to be a description of the significant positive effects missing for some of the other objectives. These need to be defined as soon as possible to allow for objective analysis to be undertaken.</p> <p>5.18 Lastly, whilst we consider that the SA is headed in the right direction, it has still taken quite some time for a team of professionally accredited Planners to understand what the process is, let alone for a member of the general public. This needs further refinement for the next stages of consultation and we strongly urge SGC to consider an alternative, simpler assessment system to which a numerical weighting is applied.</p> <p>5.19 The importance of this point has been emphasised by the Courts at the highest level. For example, in Berkeley v SSETR [2001] 2 AC 603 the House of Lords stated that it must be compiled in a way that is easily understood by the lay person without the need for expert assistance; the same applies to a SA. This is further reiterated in the RTPI's Strategic Environmental Assessment Practice Note (January 2018) which states 'given the wider public involvement and interest in the outcomes, the SA also needs to be presented in such a way that it can be readily understood' (page 23). This was discussed at length during the JSP EiP and we are mindful that, if not raised as an issue now, the new SGLP could go the same way. We are keen to see the Plan progress as quickly as possible with a clear process set out.</p>	
Strongvox Homes	<p>7. SUSTAINABILITY APPRAISAL FOR THE PHASE 1 DOCUMENT:</p> <p>7.1 There does not appear to be a specific set of questions relating to the Sustainability Appraisal for the Phase 1 document. However, we have made some general observations below, principally in respect of the approach to the Green Belt.</p> <p>7.2 Paragraph 3.27 acknowledges Green Belt as a planning consideration, but not a specific sustainability issue that needs to be addressed through the SA. Indeed, the Green Belt designation and desire to protect it is often a barrier to delivering sustainable development. Where Green Belt constrains development around an urban area with development pressures, development is simply pushed further away from the centre leading to longer commuting times, dormitory settlements, and less sustainable patterns of development.</p> <p>7.3 Furthermore, Green Belt land is often among the most sustainably located land within a District and its release has the potential to make a significantly greater contribution to the wider objectives and guiding principles of the Plan.</p> <p>7.4 We understand that the Council has included the protection of the Green Belt as an objective to be assessed through the SA, with a view to understanding how the various building blocks would contribute to its protection. However, it is important that any SA of development options needs to be 'policy off' in Green Belt terms because whether land is or is not designated as such is essentially irrelevant in sustainability terms.</p> <p>7.5 This is why we have concerns with the SA's conclusion that the loss of Green Belt</p>	11 May 2021

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	<p>land may have a minor adverse impact in sustainability terms on the basis that it supports the optimisation of development density and Brownfield sites (paragraph 4.18). It is our view that Green Belt releases are only considered once all other reasonable alternatives have been considered, including how development within existing urban areas can be maximised. As such, whether Green Belt land is released or not, has no real bearing on the extent to which Brownfield sites are maximised.</p> <p>7.6 This is not to say that Green Belt land should not be protected. National Policy is clear in that Green Belt boundaries should only be altered where exceptional circumstances can be demonstrated. However, the development of Green Belt land is not inherently more or less sustainable than the development of non-Green Belt land and so it should not factor into the SA.</p> <p>7.7 The significant adverse impacts of the five building blocks to the Green Belt identified in Table 4.4 of the SA are essentially irrelevant for the purposes of assessing sustainability.</p> <p>7.8 This is also the case at Table 4.7 which summarises the sustainability effects of options for growth at rural communities in the context of the Green Belt. The fact that Option 2 would have a significant adverse impact on the Green Belt, compared with a minor positive impact of Option 1 is irrelevant for the purpose of the Sustainability Appraisal. What is important is that Option 2 performs as well or better against all of the other SA objectives.</p> <p>7.9 That said, it does not appear that the consideration of impacts to the Green Belt have affected the SA's recommendations and we note its support for the exploration of Green Belt releases to meet the District's development needs.</p> <p>7.10 Green Belt matters aside, we are also slightly concerned that in assessing the building blocks, significant adverse impacts have been noted on the basis of development coming forward in relatively specific locations. For example, we note that a significant adverse impact has been noted for development at Market Towns on the basis that development around Thornbury would lead to the loss of Grade 2 agricultural land (paragraph 4.58). However, land around other market towns (such as Yate) is generally poorer quality and so a strategy which sought to bring development forward at Yate but not Thornbury would have a lesser impact. We would expect the SA to be updated to reflect this as the spatial distribution strategy develops.</p>	
Terry Chamberlain and Alan Jobbins	<p>7. SUSTAINABILITY APPRAISAL FOR THE PHASE 1 DOCUMENT:</p> <p>7.1 There does not appear to be a specific set of questions relating to the Sustainability Appraisal for the Phase 1 document. However, we have made some general observations below, principally in respect of the approach to the Green Belt.</p> <p>7.2 Paragraph 3.27 acknowledges Green Belt as a planning consideration, but not a specific sustainability issue that needs to be addressed through the SA. Indeed, the Green Belt designation and desire to protect it is often a barrier to delivering sustainable development. Where Green Belt constrains development around an urban area with development pressures, development is simply pushed further away from the centre leading to longer commuting times, dormitory settlements, and less</p>	06 May 2021

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	<p>sustainable patterns of development.</p> <p>7.3 Furthermore, Green Belt land is often among the most sustainably located land within a District and its release has the potential to make a significantly greater contribution to the wider objectives and guiding principles of the Plan.</p> <p>7.4 We understand that the Council has included the protection of the Green Belt as an objective to be assessed through the SA, with a view to understanding how the various building blocks would contribute to its protection. However, it is important that any SA of development options needs to be 'policy off' in Green Belt terms because whether land is or is not designated as such is essentially irrelevant in sustainability terms.</p> <p>7.5 This is why we have concerns with the SA's conclusion that the loss of Green Belt land may have a minor adverse impact in sustainability terms on the basis that it supports the optimisation of development density and Brownfield sites (paragraph 4.18). It is our view that Green Belt releases are only considered once all other reasonable alternatives have been considered, including how development within existing urban areas can be maximised. As such, whether Green Belt land is released or not, has no real bearing on the extent to which Brownfield sites are maximised.</p> <p>7.6 This is not to say that Green Belt land should not be protected. National Policy is clear in that Green Belt boundaries should only be altered where exceptional circumstances can be demonstrated. However, the development of Green Belt land is not inherently more or less sustainable than the development of non-Green Belt land and so it should not factor into the SA.</p> <p>7.7 The significant adverse impacts of the five building blocks to the Green Belt identified in Table 4.4 of the SA are essentially irrelevant for the purposes of assessing sustainability.</p> <p>7.8 This is also the case at Table 4.7 which summarises the sustainability effects of options for growth at rural communities in the context of the Green Belt. The fact that Option 2 would have a significant adverse impact on the Green Belt, compared with a minor positive impact of Option 1 is irrelevant for the purpose of the Sustainability Appraisal. What is important is that Option 2 performs as well or better against all of the other SA objectives.</p> <p>7.9 That said, it does not appear that the consideration of impacts to the Green Belt have affected the SA's recommendations and we note its support for the exploration of Green Belt releases to meet the District's development needs.</p> <p>7.10 Green Belt matters aside, we are also slightly concerned that in assessing the building blocks, significant adverse impacts have been noted on the basis of development coming forward in relatively specific locations. For example, we note that a significant adverse impact has been noted for development at Market Towns on the basis that development around Thornbury would lead to the loss of Grade 2 agricultural land (paragraph 4.58). However, land around other market towns (such as Yate) is generally poorer quality and so a strategy which sought to bring development</p>	

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