

# South Gloucestershire Core Strategy



## Draft Sustainability Appraisal Report MAIN REPORT

March 2010

## South Gloucestershire Core Strategy Sustainability Appraisal Erratum Note

This note should be read alongside the Sustainability Appraisal Main Report that accompanies the South Gloucestershire Pre-Submission Publication Draft Core Strategy.

### **Accessibility Assessment**

A drafting error has occurred in the conducting of the accessibility assessment for the broad areas of search detailed at paragraph 4.35 onwards. For Area B to the east of Thornbury, the reference point used to determine approximate distances to services and facilities should have been situated further to the north of the area to better represent an approximate central point.

As a result the following substitutes the text under **Area B East of Thornbury** on page 39, following paragraph 4.38:

#### ***Area B East of Thornbury***

*No facilities within 400 metres.*

*Within 800 metres of:*

- *Crossways primary school*

*Within 1200 metres of:*

- *Midland Way employment*
- *Streamleaze equipped play area*
- *Christ the King primary school*
- *Equipped play areas*
- *Thornbury health centre/hospital*
- *Oakleaze Road and Primrose Drive local centre/shop*

*Advantages:*

- *Less harm to important landscapes.*
- *Less impact on historic character.*
- *Basic local centre/convenience store within 15 minute walking distance, however this is the only facility within that distance.*

*Disadvantages:*

- *Poor access to High Street.*
- *Breaches Morton Way 'boundary'.*
- *Area contains two Sites of Nature Conservation Interest (SNCI), ponds and hedgerows of interest to wildlife.*
- *No facilities within a five minute walk.*

The detailed appraisal matrices contained in Appendix 10 will be updated to reflect these amendments. The minor changes made do not alter the overall findings with regard to the suitability of Area B for development.

### **Point of Clarification**

The following paragraph should be read alongside paragraph 4.38 of the Main Sustainability Appraisal Report:

*A key aim for any housing development that occurs at Thornbury is for that development to support the aims and aspirations of the town centre. Central to this is the ability of future residents to be able to comfortably walk and/or cycle to the town centre in order to discourage use of the private car, promote healthy lifestyles and to encourage town centre shopping and leisure patronage. Distances to the town centre from the east of Area F (referred to in the SA Report as Area Fb) is well beyond a comfortable walking distance of 1200 metres. Area Fa to the west is considerably closer to the town centre.*

*Due to this, it was appropriate to highlight these differences in the SA Report by dividing Area F into two sub-areas.*

### **Changes to Appendix 10**

The following changes should be noted for the Area B East Thornbury matrix in Appendix 10:

- 1.2: ✓✓ Area within 15 minute walking distance of Thornbury Hospital/Health Centre
- 6.5: Area is too distant from town centre shops/facilities/employment to encourage walking; car use would be encouraged, increasing emissions and noise.

These minor changes made do not alter the overall findings with regard to the suitability of Area B for development.

### **Changes to Appendix 11**

The following changes should be noted for the Option 2 – Morton Way Central matrix in Appendix 11:

- 1.2: ✓✓ Area within 15 minute walking distance of Thornbury Hospital/Health Centre
- 6.5: Area is too distant from town centre shops/facilities/employment to encourage walking; car use would be encouraged, increasing emissions and noise.
- 2.2: Primary school within 5-10 minute walking distance. Secondary school within cycling distance.

These minor changes made do not alter the overall findings with regard to the suitability of Option 2 for development.



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# **Non-Technical Summary**

## **Introduction**

Sustainability Appraisal (SA) is an important part of preparing the Core Strategy and must be undertaken. SA involves evaluating the impacts on economic, social and environmental objectives - the three dimensions of sustainable development. The SA process incorporates the requirements of a European law on the environmental assessment of plans (known as the Strategic Environmental Assessment Directive).

This report constitutes a Draft SA Report for South Gloucestershire's Pre-Submission Draft Core Strategy. It is being published for consultation as part of preparing the Core Strategy.

The South Gloucestershire Core Strategy is the key planning document which will set out the long term development vision for the area and the policies needed to deliver sustainable communities up to 2026. A key purpose of the Core Strategy is to identify where new development will take place, its type and scale, as well as protecting what is valued about the area. The SA demonstrates how options and choices have been considered and provides an explanation of the process of the Core Strategy's preparation.

## **Structure of the SA Report**

The SA Report is split into three broad parts:

1. Chapters 1 and 2 introduce the SA process and explain what sustainable development means in practice.
2. Chapters 3 and 4 explain how the Council arrived at the locations for development contained in the Core Strategy through the appraisal process.
3. Chapter 5 appraises all of the other policies in the Core Strategy that do not specifically relate to any place (generic policies).

## **Appraisal of the overall development strategy and the development locations**

Underpinning the preparation of the Core Strategy is the fundamental concern that high levels of growth experienced in the District over the last half century have led to high rates of traffic growth, increasing congestion, unsustainable commuting patterns and longer journey times. This growth has also not been matched by the appropriate level of supporting services and infrastructure, a situation which has been made worse by the impact of the economic recession.

The SA supports the approach taken in the Core Strategy's strategy for development which focuses development within the communities of the North and East Fringes of Bristol and Yate/Chipping Sodbury. The SA recognises that this approach is most appropriate for the following reasons:

- Potential to maximise the use of existing infrastructure, services and facilities and to improve these where necessary.
- Opportunity to reuse and recycle land and buildings.
- Opportunities to access jobs and services using public transport, walking and cycling.
- Parts of South Gloucestershire have a significant imbalance between jobs and resident workers. This strategy provides opportunities to improve the balance in all our communities.
- Minimises loss of greenfield and Green Belt land.

The Council has identified opportunities that most strongly support the Core Strategy's higher level development vision and strategic objectives. Three new neighbourhoods are identified in the Core Strategy that have been appraised in the SA, the summarised findings of which are set out below -

1) Patchway Trading and Cribbs/Mall Commercial Estates and land South of Filton Airfield:

- Contribute to the continued strengthening of communities through the diversification and provision of a richer mix of uses.
- Large development area has greater potential to support new local facilities and services.
- Large part of the development will take place on brownfield land and presents a significant opportunity to remodel existing highways as 'streets' that are more cycle and pedestrian friendly.
- Substantial existing public transport infrastructure and proposed Rapid Transit route through the site. Bus services can also be extended through the land south of the airfield to serve a new neighbourhood.
- Cycle City routes are being developed.
- Education facilities are within cycling distance and/or a short public transport trip.
- Shops and community facilities exist on the site and are within cycling distance and/or a short public transport trip.
- Not near to Conservation Areas, Listed Buildings or Scheduled Ancient Monuments.
- Larger development area and surrounding mixed uses presents a significant opportunity to provide renewable energy/heat networks.
- A larger number of local residents will increase the number of visitors to the Mall and Cribbs Causeway that are able to arrive by foot or bicycle rather than private car.

2) East of Harry Stoke and North of the Railway:

- Contribute to the continued strengthening of communities through the diversification and provision of a richer mix of uses.
- Good opportunity to integrate well within existing communities.

- New homes will be within walking distance to retail and cultural opportunities and cycle/short public transport trip to employment and education facilities.
- Proposed improvement to UWE campus will meet many cultural needs of the new community.
- Proposed Rapid Transit/Stoke Gifford Transport Link will provide significant improvements to public transport to serve the new community.
- New community can help to sustain existing local centre at Simmons View.
- Close proximity of Bristol Parkway provides opportunities for access to local and national railway network.
- Not near to Conservation Areas, Listed Buildings or Scheduled Ancient Monuments.
- Adjacent mixed uses and larger development area generates a significant opportunity to develop renewable energy/heat networks.
- New development will present an opportunity to develop 'gateway architecture' at this important entrance to the North Fringe of Bristol.
- Opportunity for woodland planting along the edge of the motorways to support climate change mitigation, biodiversity and recreational opportunities as part of an overall Green Infrastructure Strategy.

### 3) North Brimsham to southern area of Yate Rocks:

- Potential develop comprehensively with a mix of uses, facilities and services that will support new development and the existing community.
- Potential to create a sense of place, connecting with the existing communities of Yate and Chipping Sodbury and bringing benefits to the existing settlements, without affecting the valued landscape and community of Yate Rocks.
- Development can offer a choice of types of job of the kind needed in Yate and Chipping Sodbury.
- Provision of public transport improvements to the whole of North Yate community, not just new neighbourhood.
- Potential for the provision of links from new neighbourhood to Chipping Sodbury.
- Limited negative impact on the existing communities.
- The area is physically and visually contained, with potential to support and enhance natural assets and landscape features.
- Delivery of housing can begin at North Brimsham in advance of essential improvements to the local and downstream sewerage system.

The SA has also considered that some residential development should be provided to the north of Thornbury to promote greater self-containment of the town. The overall sustainability advantages of that development and the location for it are:

- Good opportunities for walking and cycling improvements between the site and the town centre.
- Development can help to provide needed family housing in the town.
- Not in the Conservation Area.
- Support the future aspirations and re-building of the Castle School.
- Attracting more young families to the town can help to surplus fill primary school places.
- Best potential for integrating the development within the existing fabric of the town.

Within villages the focus will be on supporting existing services and facilities and limiting new housing, so as not to conflict with sustainability objectives and in recognition of the limited availability of public transport. The policy in the rural areas is to set out an integrated approach to balancing the conservation and enhancement of the countryside and rural settlements with sustaining and promoting thriving rural communities and the rural economy.

At Severnside, the Core Strategy encourages joint working and cooperation between the Council and landowners to overcome the major ecological, flooding, archaeological and transport constraints in and around the area. If these constraints are not overcome further employment development in the area could have negative sustainability impacts.

### **Conclusion**

Sustainability Appraisal (SA) provides a process by which different options can be considered and assessed against a range of economic, social and environmental criteria. The findings of this SA Report have been used to inform and support the development strategy and approach to managing future development in South Gloucestershire.

# 1 Introduction

1.1 South Gloucestershire Council is preparing a set of planning policy documents for the District. These policies are being prepared in stages and, together, they will form the Council's Local Development Framework (LDF).

1.2 The first two key documents are the Core Strategy Development Plan Document (DPD) and the Gypsy and Traveller DPD, and the Joint Waste DPD. In the future these documents will be complemented by additional documents, which will set out site allocations and policies for determining planning applications. Collectively, these DPDs will be the basis for decision-making on the use and management of land and the basis for delivery in accordance with Council Plan and Sustainable Community Strategy.

1.3 Sustainability Appraisal was introduced by the Government to ensure that specific plans and policies (including those of the LDF) are prepared to accord with the principles of sustainable development. SAs incorporate the requirement of European Directive 2001/42/EC, to undergo a process known as Strategic Environmental Assessment (SEA).

1.4 The overall aim of the appraisal process is to ensure that the South Gloucestershire LDF and the Local Development Documents (LDDs) it contains make an effective contribution to the pursuit of sustainable development.

## **Sustainable Development**

1.5 The term sustainable development originates from the Brundtland Commission Report of the World Commission of Environment and Development in 1987, which defined sustainable development as:

*“Development that meets the needs of the present without compromising the ability of future generations to meet their own needs”.*

1.6 The UK Government has developed a strategy for sustainable development to guide its own national policy development and implementation. This strategy, released in March 2005, sets out a number of guiding principles:

- Living within environmental limits;
- Ensuring a strong, healthy and just society;
- Achieving a sustainable economy;
- Promoting good governance; and
- Using sound science responsibly

1.7 The UK Government's Sustainable Development Strategy further sets out a number of shared priorities for UK action. These are:

- Sustainable consumption and production;
- Climate change and energy;

- Natural resource protection and environmental management; and
- Sustainable communities.

1.8 In addition to these objectives, Planning Policy Statement 1: Delivering Sustainable Development (PPS1) provides further guidance on integrating sustainable development within the spatial planning system. In particular, PPS1 promotes urban and rural regeneration that:

- Promotes regional, sub-regional and local economies;
- Promotes communities which are inclusive, healthy, safe and crime free;
- Brings forward land of suitable quality in the right locations;
- Gives high priority to ensuring access for all to jobs, health, education, shops, leisure and community facilities; and
- Promotes a more efficient use of land.

1.9 South Gloucestershire Council fully supports these aims and seeks to ensure that in all plans, policies and programmes that we do, we fully take on board the requirement that today's development meets the needs of future generations.

### **Strategic Environmental Assessment**

1.10 Under the requirements of European Directive 2001/42/EC (known as the 'SEA Directive') local authorities are required to carry out, in almost all cases, a Strategic Environmental Assessment (SEA) of their Local Development Documents.

1.11 The purpose of SEA is to consider issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape, and to determine how the Council's policies and proposals could influence each of these.

1.12 By considering these issues in detail, SEA seeks to ensure that environmental considerations are fully integrated in the preparation and adoption of plans and programmes which are likely to have a significant effect on the environment.

### **Sustainability Appraisal**

1.13 Whilst SEA focuses on environmental issues, Sustainability Appraisal (SA) widens the approach to include social and economic issues. The purpose of SA is to ensure that the principles of sustainable development are taken fully into account when preparing the LDDs that form the LDF.

1.14 The SA process has been designed so that, in carrying out one appraisal process, local authorities can also satisfy the requirements of the SEA Directive. Therefore, it should be taken that where this report refers to the SA process it also incorporates the requirements of the SEA Directive.

1.15 The process of SA requires an examination of the state of South Gloucestershire as it is today and the identification of key issues that could affect the future sustainability of the District. Using this information, sustainability objectives are developed, against which the draft policies and proposals of the LDF will be assessed in order to ensure that they best achieve the sustainability objectives.

1.16 The SA LDF Scoping Report (available separately), which was approved by the Council in March 2008, sets out this work and should therefore be read in conjunction with this SA Report. This SA Report should also be read in conjunction with the SA Report that was published alongside the Core Strategy Issues and Options document in June 2008.

1.17 The final SA Report published alongside the submission Core Strategy will also put in place a framework to monitor policies and proposals once in operation, in order to ensure that they are working in a way that accords with sustainability objectives. This will help to inform future amendments to policies which may be necessary.

1.18 The Council has worked with a wide range of partners in producing this SA Report. Parish and Town Councils, local businesses, voluntary and community groups have fed into the ongoing SA work and contributed specific local knowledge to the appraisal.

## **Regional Spatial Strategy for the South West (the RSS)**

1.19 The draft Regional Spatial Strategy (RSS) was submitted to government in April 2006. It was subject to an Examination in Public (EiP) between April and July 2007 and the EiP Panel's report was published in January 2008. The government published its Proposed Changes to the draft RSS, taking account of the Panel's report, in July 2008.

1.20 On 15 June 2009 the Government Office for the South West (GOSW) wrote to South West local authority Chief Executives to inform them that, due to the need to consider the implications of the successful legal challenge to the East of England RSS, the South West RSS would not be published by the end of June, as had previously been expected. No timescale for the adoption of the RSS was given.

1.21 A further letter was received from the Government Office on 25 June 2009, indicating that some omissions to the sustainability appraisal of the RSS needed to be corrected "with the minimum delay to completion of the RSS process." GOSW advice was that RSS had reached such an advanced stage that they would expect it to be given considerable weight in consideration of any application for development and that local authorities should continue with the preparation of Core Strategies and not wait for the final RSS to be published.

1.22 On 25 September 2009 the Government Office issued a further letter and press release which announced that the RSS would be further delayed, pending further work on sustainability appraisal. The revised sustainability appraisal will not be completed until early January, at which point Government Office will make a decision about the next steps in relation to the preparation and approval of the RSS.

1.23 On 21<sup>st</sup> December 2009 the Government Office issued a letter confirming that the further SA work on the RSS had been commissioned. No further statements have been issued on the timetable for the publication of the RSS.

### **The South Gloucestershire Core Strategy**

1.24 The Core Strategy DPD, once adopted, will set out the overall strategy for the future development of South Gloucestershire. It will be set against the policy context of the RSS, South Gloucestershire's Sustainable Community Strategy and stakeholder input.

1.25 South Gloucestershire has seen a high level of development over the past twenty five years. Between 1985 and 2008 approximately 29,600 dwellings have been built in the district and between 1981 and 2005 the number of jobs has risen by approximately 83,000 (sources: South Gloucestershire Council, Avon County Council Statistics and the National on-line Manpower Information Service).

1.26 Given the uncertainty regarding the RSS, the Council considers that the best approach is to make progress by developing an pre-submission Core Strategy which sets out, with some certainty, the approach to managing growth in the short to medium term and a suite of planning policies which can be used for the management of development and in determining planning applications. This pre-submission draft Core Strategy will then be given weight in the consideration of planning applications. Core Strategy policies and proposals for the longer term will be developed once the uncertainty over the RSS is resolved.

### **Aim of this SA Report**

1.27 This report constitutes a Draft SA Report for South Gloucestershire's pre-submission draft Core Strategy. It is being published for consultation to provide the public and statutory bodies with an opportunity to express their opinions on it.

1.28 This SA meets the requirements of both the Planning and Compulsory Purchase Act 2004 and the SEA Regulations, as far as is possible, given the early stage of the DPD's production. This SA Report therefore includes the initial required elements of an 'Environmental Report' (the output required by the SEA Directive). Further SA Reports will be published with the subsequent Core Strategy documents.

1.29 This SA Report appraises each of the policies contained in the Core Strategy. The principle aim is to appraise the appropriateness of the decisions to allocate land for certain purposes and to establish the principle of development. This conforms with the plan-led approach and the primacy to be attached to the development plan. Given the strategic nature of the Core Strategy the appraisal work is inevitably 'broad brush'. More detailed work will be required at the planning application stage or elsewhere in the Local Development Framework in accordance with statutory planning regulations.

1.30 The purpose of Sustainability Appraisal is not to identify the best options. Sustainability Appraisal is a tool to be used during the preparation of a plan to inform the decision making process and ensure that sustainability considerations are taken fully into account.

## 2 SA Methodology and SEA Requirements

2.1 The SA process is typically conducted in two stages: the first being the 'Scoping' stage (stage A); and the second (stage B) being the actual appraisal stage (see table below).

**Table 1: Stages of the SA process**

<b>Stages and Tasks of the SA process( as set out by ODPM SA Guidance, 2005) and where they are conducted in the Core Strategy SA Reports,</b>
<b>Stage A: Setting the context and objectives, establishing the baseline and deciding the scope</b>
A1: Identifying other relevant plans, programmes, and sustainability objectives – Scoping Report
A2: Collecting baseline information – Scoping Report
A3: Identifying sustainability issues and problems – Scoping Report
A4: Developing the SA Framework – Scoping Report
A5: Consulting on the scope of the SA – Scoping Report
<b>Stage B: Develop options and policies, taking account of assessed effects and developing the draft DPD</b>
B1: Testing the DPD objectives against the SA Framework – Initial SA Report
<b><i>B2: Developing the DPD options – <u>Initial SA Report and this SA Report</u></i></b>
<b><i>B3: Predicting the effects of the DPD – <u>this SA Report</u></i></b>
<b><i>B4: Evaluating the effects of the DPD – <u>this SA Report</u></i></b>
<b><i>B5: Considering ways of mitigating adverse effects and maximising beneficial effects – <u>this SA Report</u></i></b>
B6: Proposing measures to monitor the significant effects of implementing the DPD – to be included in final SA Report.
<b>Stage C: Preparing the Sustainability Report</b>
C1: Preparing the SA Report
<b>Stage D: Consulting on the SA Report</b>
D1: Consulting on the SA Report

2.2 Stage A of the SA process was conducted by the Council in 2007 and early 2008. The output of Stage A is the production of a 'Scoping Report' that sets out the results of tasks A1 to A5 in the table above. South Gloucestershire's Scoping Report was subject to statutory public consultation in November and December 2007 and was subsequently updated and approved by the Council on 26<sup>th</sup> March 2008. As a result of the consultation some of the SA Objectives were refined, together with other parts of the Scoping Report.

2.3 South Gloucestershire's Scoping Report (available separately) acts as the Scoping Report for all Development Plan Documents and Supplementary Planning Documents being produced by the Council as part of the Local Development Framework. One of the main outcomes of the Scoping Report stage is the development of the Sustainability Appraisal Framework. This is a set of SA Objectives that are linked to targets, the achievement of which can be measured by specified indicators. The SA Framework for South Gloucestershire is shown in Appendix 2: the objectives and sub-objectives in the table are what have been used to appraise and develop the options and objectives contained in the Issues and Options document.

#### **Update to Baseline Data**

2.4 It is important that the Scoping Report should be reviewed and kept up to date on a regular basis. This can be achieved by new and updated relevant information being presented in SA Reports. This in effect acts as an update to the Scoping Report so it can be assured that the SA process is conducted with the most up to date baseline information available to inform the appraisal.

2.5 A set of 'settlement profiles' was included in the Initial SA Report. The Council produced these profiles in order to inform the production of Core Strategy policies relating to existing settlements in the district and for justification of policies. The profiles were published as part of the Initial SA Report in order to update current baseline data.

2.6 The appraisals in this SA Report continue to draw from those Community Profiles, together with the baseline information collated in the Scoping Report. Since the Initial SA Report was published a number of further technical studies have been completed that have informed the production of the Core Strategy and the appraisals of policies in this SA Report:

- **West of England Strategic Housing Market Assessment (SHMA)** A joint study with 5 other authorities (Bristol, Bath & North East Somerset, North Somerset, South Somerset and West Wiltshire). Available separately.
- **Residential Land Availability Survey** An annual survey, the most recent of which is 2009. Available separately.

- **Town Centres and Retailing in South Gloucestershire** An annual survey, the most recent of which is 2009. Available separately.
- **Town Centre and Retail Study for South Gloucestershire** Work in progress
- **Employment Land Study** Work in progress
- **Employment and Non Residential Land Availability Survey** An annual survey, the most recent of which is 2009. Available separately.
- **South Gloucestershire Strategic Flood Risk Assessment (SFRA), Level 1 Report, February 2009** Provides technical advice on the avoidance, reduction and management of flood risk. Available separately.

## **Stage B: Developing and refining options and assessing effects**

### **Difficulties encountered during the appraisal process**

2.7 The main difficulty encountered throughout the appraisal work conducted as part of this SA Report has been the strategic nature of the Core Strategy. The options and objectives presented in the Core Strategy document are strategic in approach, thus making it difficult to appraise in any detail the likely sustainability impacts. For the majority of the policies presented, the impacts on sustainability will depend on the form of future LDF production and on the implementation of policy through the development management process.

### **Defining significance of effects**

2.8 The SEA Directive requires that it is the likely significant effects of Development Plan Documents that are appraised. In order to determine whether the effect of a policy or proposal is significant or not, a number of issues have been taken into account as detailed in the SEA Regulations:

- Whether the effect is likely to be permanent or temporary.
- The likelihood of the effect occurring.
- The scale of the effect (e.g. whether it will affect one location or a wide area).
- Whether it will combine with the effects of other policies and proposals to generate a cumulative effect greater than the effect of each individual policy or proposal.
- Whether there are policies elsewhere at the regional or national level that will help to mitigate adverse effects occurring or support positive effects.
- The current status and trends in the environmental, social and economic baseline or characteristics of the area affected.
- Whether it is likely to affect particularly sensitive locations (e.g. landscapes, communities, habitats, historic buildings, particularly those that are designated at the international or national level) or mean that thresholds might be breached (e.g. air quality standards).

- The significance the pitch requirement would have on the future dwelling requirement for the authorities.

2.9 A table setting out how this SA Report meets SEA requirements is contained in Appendix 6.

## Issues & Options Stage: Initial SA Report

2.10 The objectives of a DPD set out what it is aiming to achieve in spatial planning terms and set the context for development of policy framework options for the DPD. The objectives that were set out in the Issues and Options document were based on the issues facing the district. The Initial SA Report conducted tasks B1 and B2.

2.11 It is important for the objectives of the DPD to be in accordance with sustainability principles and therefore the objectives should be tested for compatibility with the SA objectives.

2.12 Two recommendations of the Initial SA Report were:

- 1) To consider revising DPD Objective 1 from 'Delivering Growth' to 'Delivering Growth Sustainably'.
- 2) To consider revising DPD Objective 2 from 'Tackling Congestion and Improve Accessibility' to 'Reduce Car Usage and Improve Accessibility'.

2.13 These recommendations have been taken into account in the redrafting of the Core Strategy's objectives.

## SA Report Tasks

2.14 This SA Report conducts the following four SA tasks as defined in the 2005 ODPM SA guidance:

<b><i>B2: Developing the DPD options (continued from Initial SA Report)</i></b>
<b><i>B3: Predicting the effects of the DPD</i></b>
<b><i>B4: Evaluating the effects of the DPD</i></b>
<b><i>B5: Considering ways of mitigating adverse effects and maximising beneficial effects</i></b>

2.15 Task B6 (Proposing measures to monitor the significant effects of implementing the DPD) will be included in the Final SA Report that accompanies the Submission version of the Core Strategy.

### **3. Appraisal of Development Strategy**

#### **Strategic Appraisal of locations for development**

3.1 The purpose of this section is to appraise the Strategy for Development outlined in Section 4 of the Core Strategy to ensure that the least damaging strategic locations are identified for future growth to meet sustainability objectives. The Strategy for Development sets out the overall approach to the provision of new homes, jobs and infrastructure and how this new development will be delivered and managed.

3.2 The following section explains firstly how the Council has developed its spatial development strategy and secondly how it has assessed alternative strategic options for the provision of new homes, jobs and infrastructure. This statement represents a high level analysis of the alternatives considered set within the context of the current uncertainty regarding the RSS and the impact of the economic recession.

#### Regional Spatial Strategy

3.3 The preparation of the Core Strategy has been undertaken in the context of the ongoing delay with finalising the South West Regional Spatial Strategy (RSS) which is the higher level strategic planning document for the whole of the South West. The draft RSS was submitted to government in April 2006. It was subject to an Examination in Public (EiP) between April and July 2007 and the EiP Panel's report was published in January 2008.

3.4 The RSS Panel Report recommended 30,800 new homes over a 20 year period. The Proposed Changes to the RSS were published by the Secretary of State in July 2008. This identified 32,800 new homes for South Gloucestershire. However, due to a successful legal challenge to the East of England Regional Spatial Strategy, the RSS has been delayed pending further work on sustainability appraisal to ensure that reasonable alternatives to the areas of search proposed and the substantial release of Green Belt/greenfield land are properly tested. It is currently unclear when this work is due to be completed and what action the government will take to progress the RSS. At the time of writing the final RSS has not been published.

#### Impact of the economic slow down and housing market collapse

3.5 The current economic recession and consequential impact on the housing market has also significantly influenced the strategy for development. It is quite clear that levels of economic activity used to support the emerging RSS are now no longer expected to be achieved, certainly in the short to medium term. While these matters remain to be considered by the Government as part of the additional work needed to finalise the RSS, they represent very significant issues that might have a major bearing on the final RSS.

## Alternative options for the Core Strategy

3.6 Given the context of the RSS and the impact of the economic slow down, three possible options for the Core Strategy were available to the Council.

- Option 1 - defer the next stage of the Core Strategy until the situation with the RSS is resolved and the housing market and development viability returned to previous market levels.
- Option 2 – progress the Core Strategy based on the RSS Proposed Changes
- Option 3 – progress the Core Strategy taking into consideration the uncertainty regarding the RSS and the impact of the economic slowdown.

3.7 In assessing these options, the Council discounted Options 1 and 2. Option 1 - deferring progress on the Core Strategy, would have allowed time for the RSS situation to be resolved. However, there remains no clear prospect of this being concluded. In the meantime, the existing Local Plan, adopted in January 2006, is increasingly becoming dated. Selecting Option 1 was rejected as it would reduce the ability of the Council to consider development proposals and manage the pressure for development using the most up to date and relevant policies.

3.8 Option 2 - progressing the Core Strategy based on the RSS Proposed Changes, was rejected as inappropriate given the situation regarding the possible legal challenge to the RSS. This was on the basis that the Secretary of State was unable to finalise the RSS because of a failure to ensure that reasonable alternatives to the areas of search proposed and the substantial release of Green Belt/greenfield land, had been properly tested. It would not therefore be appropriate for the Council's Core Strategy to be prepared so that it is in conformity with a potentially flawed plan.

3.9 The Council's decision to take forward Option 3 was informed by the West of England Multi-Area Agreement (MAA). In August 2009 South Gloucestershire Council was a co-signatory of the MAA. The MAA is a formal agreement with Government about the commitment of the four unitary authorities in the West of England to deliver the following five priorities:

- To mitigate the impact of the current economic recession and act to support early upturn.
- To plan and manage the growth in homes and jobs in order to build mixed and sustainable communities
- To improve access and reduce traffic congestion to increase competitiveness and quality of life
- To attract and grow business investment to increase economic growth and competitiveness
- To improve skills and reduce worklessness to increase competitiveness, growth and regeneration.

3.10 The endorsement of the MAA by the Department for Communities and Local Government (CLG) substantiates the Council's position that given the current economic downturn and the ongoing delay and uncertainty regarding the RSS, it is both reasonable and sensible for South Gloucestershire to identify levels of housing provision that reflect the current economic context and look forward with a degree of realism and certainty. The MAA provides the basis to achieve this. Faced with the prospect of no Core Strategy or a Core Strategy potentially based on a flawed RSS, it was considered on balance, following discussions with GOSW and the endorsement of the MAA by CLG, to progress the Core Strategy but to have regard to the impact of the economic recession on both the ability of the development sector to deliver new homes and for people to access mortgage finance.

3.11 Option 3, the preferred approach, therefore focuses on the level of development that is deliverable in the next 10 years and sets a broad framework for the longer term. This approach was discussed with GOSW and considered to be a pragmatic and achievable way forward that enabled progress to be maintained with the Core Strategy while making provision for sufficient additional new homes at an average rate of 1,111 per annum.

### **Assessment of options for strategic growth**

3.12 In light of the situation described above, the purpose of the SA of the strategy for development is to examine potential strategic areas for development, as there is no higher level RSS policy in place that has reliably undertaken this task to date. However, notwithstanding this, the Council has drawn upon SA work undertaken to support the draft RSS. It is recognised that sufficient land to provide up to 21,500 new homes cannot be met solely from opportunities within the existing urban areas and settlement boundaries of the North and East Fringes of Bristol and the towns of Yate, Chipping Sodbury and Thornbury. In recognising that additional development land is required, the Council has therefore sought to qualify and refine previous RSS SA evidence.

3.13 Underpinning the selection of strategic growth areas in South Gloucestershire is the fundamental concern that high levels of growth experienced in the District over the last half century have led to high rates of traffic growth, increasing congestion, unsustainable commuting patterns and longer journey times. This growth has also not been matched by the appropriate level of supporting services and infrastructure, a situation which has been exacerbated by the impact of the economic recession.

3.14 Appendix 7 contains detailed appraisals that assess each of the potential strategic locations for growth in terms of sustainability in relation to their potential to accommodate future development. Thornbury is excluded from this assessment as it is not considered a strategic location in accordance with the emerging RSS spatial strategy. A separate assessment of the alternatives available at Thornbury is contained within Appendices 10 and 11.

The paragraphs which follow set out the overall summary of the key SA findings.

## **1) Strong urban focus**

3.15 In assessing alternative options, the Council has prioritised land within the existing urban areas of the north and east fringes of Bristol and Yate/ Chipping Sodbury to promote sustainable communities and the efficient use of brownfield land. This includes land with planning consent or allocated for development, as well as other previously developed land with a reasonable prospect of development in the next five years. To reject land from these sources in favour of other locations, would be to ignore existing commitments, allocations in the South Gloucestershire Local Plan which are still to come forward and the contribution that previously developed land can make to strengthening communities.

### **Positive Sustainability Impacts**

- Development has the potential to maximise the use of existing infrastructure, services and facilities and to improve these where necessary.
- Provides an opportunity to reuse and recycle land and buildings.
- New residents have opportunities to access jobs and services using public transport, walking and cycling.
- Parts of South Gloucestershire have a significant imbalance between jobs and resident workers. This strategy provides opportunities to improve the balance in all our communities.
- Minimises loss of greenfield and Green Belt land.

### **Negative Sustainability Impacts**

- Potential loss of employment land to residential development. This could exacerbate the poor ratio between jobs and resident workers in some communities.
- Potential loss of green spaces to residential development could result in loss of recreation and play spaces.
- Increasing housing density through conversion, subdivision and building on gardens can have adverse impacts on residential amenity.
- Potential strain on existing services and infrastructure which is already inadequate in some areas.
- Increased population could result in increased congestion on the road network.
- Difficult to ensure that small scale developments make a sufficient contribution to the cumulative impact on services and facilities.

### **Core Strategy approach to minimising negative impacts**

- Strategy and policies to safeguard, allocate and release employment land so as to improve the balance of our communities. In particular release employment land around Cribbs/Patchway to provide for new residential development while sufficient employment land is being

safeguarded in the East Fringe and Yate/Chipping Sodbury where there are twice as many resident workers as jobs.

- Green infrastructure strategy to safeguard and improve the GI network.
- Policies to secure contributions to necessary infrastructure, services and facilities.
- Policies to secure high quality housing design.
- Policies to secure appropriate housing density and diversity.

## **2) Additional Greenfield Land**

3.16 With regard to the need for additional greenfield land the Council has sought to identify opportunities that most strongly support the Core Strategy's higher level development vision and strategic spatial objectives. In this respect, it is not simply sufficient to take forward the locations identified by the RSS Proposed Changes, given the significant uncertainty that surrounds the RSS.

3.17 In selecting which greenfield locations to consider in this strategic SA the Council has recognised the merit of the approach of the Draft RSS in not identifying areas of search north and west of the M4/M5. The Council does not see it as necessary to repeat this analysis. This section therefore assesses the areas of search west of the M32 and south of Emersons Green/ east of Kingswood, as well as the areas of search around Cribbs/Patchway and north of Yate/Chipping Sodbury introduced in the Panel Report and refined in the Secretary of State's proposed changes.

### **2a) Greenfield land at Cribbs/Patchway**

3.18 The undeveloped land at Cribbs/Patchway includes land to the south of Filton Airfield and Greenbelt land to the north of the A4018.

#### **Positive Sustainability Impacts**

- This area is relatively close to a wide range of existing jobs and services as well as retail opportunities around The Mall and has good public transport links to the rest of the North Fringe and Central Bristol.
- Redevelopment would create opportunities for a better mix between employment and residential uses and the support the objective of providing an improved local centre around the Mall and retail areas at Cribbs Causeway for new and existing communities.
- Residential development would help to redress the imbalance between jobs and resident workforce in this area.

#### **Negative Sustainability Impacts**

- The future operation of the Airfield could be compromised by residential development.
- Noise and health and safety issues relating to the airfield and M5 motorway.

- Loss of Greenbelt land to the west of the A4018.
- Potential for creating successful new communities is limited due to the scale of the developable land and severance by the road and rail network.
- Potential loss of landscape, biodiversity and recreational assets with the development of greenfield land.
- Potential impact on already congested M5 Junction 17.
- Some areas are within the SFRA flood zones 2, 3a and 3b.

### **Core Strategy approach to minimising negative impacts**

- Further appraisal to identify the most sustainable site area, mix, scale, design and infrastructure requirements for this strategic location is set out in part 4 of this report.
- Detailed development planning in this location would need to be done in consultation with Bristol City Council as many local services are within the adjoining neighbourhoods of Bristol.

## **2b) Land West of the M32**

3.19 This area includes the greenfield land south of the M4, west of the M32 and north of the boundary with Bristol City.

### **Positive Sustainability Impacts**

- This area is very well located in terms of access to a wide range and number of jobs, higher education and other services and facilities.
- There are good public transport links with central Bristol.
- The area is directly linked to existing and proposed communities.
- Residential development in this area would help to improve the balance between jobs and resident workers in this area which is currently 2:1.
- Provided that the Stoke Gifford Transport Link is delivered there may be scope for the release of Green Belt land for development in this area.
- Development here could contribute to public transport, walking and cycling improvements.

### **Negative Sustainability Impacts**

- Loss of Green Belt land.
- Air quality and noise issues associated with the road network.
- The landscape setting of Stoke Park and Hambrook conservation area as well as the green entrance to Bristol could be compromised by development.
- Potential loss of ecological, and landscape assets.
- Potential loss of Grade 1 agricultural land.
- A deficit of existing services in the area will need to be addressed.
- Some areas are within the SFRA flood zones 2, 3a and 3b.

### **Core Strategy approach to minimising negative impacts**

- Further appraisal to identify the most sustainable site area, mix, scale, design and infrastructure requirements for this strategic location is set out in Part 4 of this SA Report.

## **2c) Yate/Chipping Sodbury**

3.20 In line with the South Gloucestershire Green Belt assessment, in assessing Yate/ Chipping Sodbury as a strategic location for growth the Council has considered all greenfield land adjacent to the towns except for land to the south and south west which is designated as Green Belt.

### **Positive Sustainability Impacts**

- Yate & Chipping Sodbury have a very good range of local services including secondary schools, retail and leisure facilities.
- Strong town centres with potential for improvement.
- Due to the existing range of services and facilities and the environmental quality of the existing communities there is potential to integrate new neighbourhoods into a sustainable community.
- Bus based public transport serves local and key destinations with potential for improvements.
- There is a mainline railway service to Gloucester and Bristol. Currently there is an hourly service with potential to increase to a half hour service.
- Mixed development would provide an opportunity to help redress the balance between resident workers and jobs and provide a wider range of job opportunities.
- Development could help to provide essential new sewerage infrastructure as part of a comprehensive drainage strategy.

### **Negative Sustainability Impacts**

- Loss of greenfield land
- Existing problems with traffic congestion and through freight traffic could be exacerbated.
- Existing problems with sewerage infrastructure capacity.
- Potential impact on historic assets including Chipping Sodbury conservation area.
- Potential adverse impact on landscape assets and the Cotswolds AONB.
- Current profile of the employment base of Yate/Chipping Sodbury.
- Existing high levels of out-commuting could be exacerbated.
- Some areas are within the SFRA flood zones 2, 3a and 3b.

### **Core Strategy approach to minimising negative impacts**

- Further appraisal to identify the most sustainable site area, mix, scale, design and infrastructure requirements for this strategic location is set out in Part 4 of this report

## **2d) South of Emersons Green and east of Kingswood**

3.21 In assessing land in this location the Council has considered land adjacent to the existing urban area from south of Emersons Green to Oldland Common to the south.

### **Positive Sustainability Impacts**

- In common with all other strategic locations this development would provide additional land for housing.

### **Negative Sustainability Impacts**

- Loss of Green Belt land.
- Development in this location would involve the loss of greenfield land which is highly valued for its recreational value by existing residents of the East Fringe of Bristol where green space is underprovided. There are significant areas of public open space and common land within this area.
- Development could compromise the open green hillsides and ridgelines which provide important views from the urban areas and make a significant contribution to the character and quality of the East Fringe of Bristol.
- Development in this area would overwhelm existing rural communities which would lose their separate identity and character.
- The fragmented nature of developable land in this area makes the achievement of sustainable new neighbourhoods difficult.
- The potential to integrate new communities with existing communities in this area is limited.
- The area suffers from high levels of congestion along the Ring Road and on routes into central Bristol and into Bath which affects journey times and air quality.
- No significant improvements to road infrastructure or public transport have been identified as deliverable before 2020 with the exception to the rapid transit route to Emersons Green. Any strategic development in this area would have to overcome these significant constraints.
- Potential harm to the environmental and heritage assets including the AONB, Siston conservation area and Grade 1 listed Siston Court.
- This area performs very poorly in terms of access to employment. Currently there are twice as many resident workers as jobs with high levels of out commuting especially to central Bristol.
- Some areas are within the SFRA flood zones 2, 3a and 3b.
- Public engagement has demonstrated significant concern about growth in this area.

### **Thornbury**

3.22 The strategy for Thornbury is to provide development to support the vibrancy and vitality of the town centre, the schools and employment base whilst protecting the town's valuable historic character. The strategy for Thornbury is set out in Policy CS32 which is assessed in part 5 of this SA Report. The location identified as a housing opportunity area is set out in policy CS33 and is assessed in part 4 of this SA report.

### **Rural Areas**

3.23 The policy in the rural areas is to set out an integrated approach to balancing the conservation and enhancement of the countryside and rural settlements with sustaining and promoting thriving rural communities and the rural economy. The strategy for rural areas is set out in Policy CS34 which is assessed in part 5 of this SA report.

### **Development Strategy - Preferred Option**

3.24 In selecting the most appropriate locations, the Strategy for Development focuses development within the communities of the North and East Fringes of Bristol. Strategic areas for growth are identified at Cribbs/Patchway and west of the M32. This will be accompanied by a package of public transport infrastructure measures giving greater access to public transport, improved frequency and quality of service, reducing commuting and the need to travel. It will be supported by the protection of employment land and green assets and provision of other community infrastructure. The strategy therefore focuses development in the locations where essential infrastructure is in place or planned. Outside of the urban areas, development will be provided in Yate/Chipping Sodbury and Thornbury to promote greater self-containment of these settlements. Within villages the focus will be on supporting existing services and facilities and limiting new housing, so as not to conflict with sustainability objectives and in recognition of the limited availability of public transport.

## **4. Appraisal of Strategic Locations in Development Strategy**

### **Consideration of Alternatives**

4.1 The consideration of alternatives as part of the development of the Core Strategy complies with the SEA Directive which states that the Environmental Report should consider “*reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme*” and give “*an outline of the reasons for selecting the alternatives dealt with*” (Article 5.1 and Article 1 (h)).

4.2 In this section the Strategic locations for development are appraised against sustainability criteria in order to make comparisons between sites and select the most sustainable options. In Section 5 all policies are appraised, including the specific requirements contained in the policies for the new neighbourhoods.

### **Detailed Appraisal**

4.3 Detailed matrices for the appraisal of policies associated with the allocation of land for development are contained in the appendices as follows:

- Appendix 8: appraisal of options for development in the North Fringe of Bristol.
- Appendix 9: appraisal matrices of options for development in Yate/Chipping Sodbury.
- Appendices 10 and 11: appraisal matrices of areas of search and Thornbury development options.

## **North Fringe of Bristol Urban Area Appraisal of Strategic Locations for Development**

### **Policy CS26: Cribbs Causeway/Patchway New Neighbourhood**

4.4 Three strategic options were appraised (detailed matrices and maps are contained in Appendix 8). In summary the outcomes of those appraisals were:

#### **PATCHWAY TRADING & CRIBBS / MALL COMMERCIAL ESTATES**

##### **4.5 Positives:**

- Development is not within SFRA Level 1 Report flood zones.
- Development on brownfield land. Opportunity for development to regenerate area and assist the continued regeneration of Patchway.
- Area has substantial public transport infrastructure through it and proposed Rapid Transit route to connect to The Mall interchange.
- Cycle City routes are being developed through the site.
- Secondary, Further and Higher Education facilities are within cycling distance and/or short public transport trip.
- Retail and culture facilities within walking distance.
- Development area not near to Conservation Areas, Listed Buildings or Scheduled Ancient Monuments.
- Surrounding mixed uses result in significant opportunities to development CHP/District Heating networks.
- Potential to provide new homes within walking distance to retail and cultural opportunities and cycle/short public transport trip to significant employment and higher, further and secondary education facilities.
- Development not on visually significant hillsides and ridges.
- Potential to 'open up' the Henbury Trym and provide a new green wildlife/recreational corridor through the area.

##### **4.6 Negatives:**

- Existing road network is unpleasant for pedestrians and cyclists.
- Reduced health due to noise pollution from M5 and airfield. Buildings could be designed to insulate from noise and new open space and remodelled roads could incorporate trees that would assist improve air quality and mitigate noise.

#### **WEST OF A4018**

##### **4.7 Positives:**

- Area adjacent to public transport infrastructure.
- Secondary, Further and Higher Education facilities are within a public transport trip.
- Retail and culture facilities are within cycling or short public transport trip.

- Development area not near to Conservation Areas, Listed Buildings or Scheduled Ancient Monuments.
- Potential to provide new homes within cycling distance to retail and cultural opportunities and cycle/ public transport trip to significant employment and higher, further and secondary education facilities.

#### 4.8 **Negatives:**

- Development of housing in this area (at the end of the runway) is likely to constrain the operation of Filton Airfield.
- Small part of area within SFRA flood zones.
- Development within HSE consultation zones (oil pipelines).
- Reduced health due to noise pollution from Filton Airfield, M5 and railway line. Buildings could be designed to insulate from noise and new open space could incorporate trees that would assist improve air quality and mitigate noise.
- A4108 is significant barrier to integration of a new development with wider area.
- Development on visually significant hillsides and ridges.
- Potential loss of private playing fields. Although the playing field could be relocated, unless they are relocated nearby, they will be of little benefit to the new community.
- Development on greenbelt.

### **SOUTH OF AIRFIELD**

#### 4.9 **Positives:**

- Area adjacent to public transport infrastructure.
- Secondary, Further and Higher Education facilities within cycling distance and a short public transport trip.
- Retail and cultural facilities not within walking distance, but are within cycling or short public transport trip.
- Cycle City route being developed through the site.
- Opportunity to extend bus service from Bristol City Centre that terminates at Airbus to route directly through the site.
- Development area not near to Conservation Areas, Listed Buildings or Scheduled Ancient Monuments.
- Potential to provide new homes within cycling distance to retail and cultural opportunities and cycle/ public transport trip to significant employment and higher, further and secondary education facilities.
- Potential to open up the Henbury Trym and provide a new green wildlife/recreational corridor, resulting to improvements to green infrastructure and habitats.
- In the longer term there is the potential to secure a new station and open the heavy rail line from Henbury for passenger use.
- Opportunity to support community development in Brentry.

#### 4.10 **Negatives:**

- Small part of area within SFRA flood zones

- Development on grassland habitat.
- Potential reduced health due to noise pollution from Filton Airfield and railway line. Buildings could be designed to insulate from noise and new open space could incorporate trees that would assist improve air quality and mitigate noise.
- Railway line could act as barrier to integration with Brentry.

### **PREFERRED OPTION**

### **PATCHWAY TRADING & CRIBBS / MALL COMMERCIAL ESTATES & LAND SOUTH OF AIRFIELD**

4.11 The combined Patchway & Cribbs / Mall Trading Estate and Land South of the airfield are proposed for the following key reasons:

- The development area will most contribute to the continued strengthening of communities in Patchway (including Charlton Hayes) and Brentry through the diversification and provision of a richer mix of uses.
- Larger development area has greater propensity to support new local facilities and services.
- Large part of the development will take place on brownfield land and presents a significant opportunity to remodel existing highways as 'streets' that are more cycle and pedestrian friendly.
- Development area has substantial existing public transport infrastructure and proposed Rapid Transit route through the site. Bus services can also be extended through the land south of the airfield to serve a new neighbourhood.
- Cycle City routes are being developed through the areas.
- Secondary, further and higher education facilities are within cycling distance and/or short public transport trip.
- Retail and culture facilities exist on the site and are within cycling distance and/or short public transport trip of development south of airfield.
- Development area not near to Conservation Areas, Listed Buildings or Scheduled Ancient Monuments.
- Larger development area and surrounding mixed uses presents a significant opportunity to develop/stimulate CHP/District Heating networks.
- A larger number of local residents will increase the number of visitors to the Mall and Cribbs Causeway that are able to arrive by foot or bicycle rather than private car.

4.12 Land to the west of the A4018 has been excluded for the following key reasons:

- Development of housing in this area (at the end of the runway) is likely to most constrain the operation of Filton Airfield.
- The area is most affected by noise pollution from Filton Airfield, M5 and railway line.

- A4018 is significant barrier to integration of a new development with wider area.
- Development is on visually significant hillsides and ridges.
- Potential loss of private playing fields. Although the playing field could be relocated, unless they are relocated nearby, they will be of little benefit to the new community.
- Development on Green Belt.

## **Policy CS27 East of Harry Stoke New Neighbourhood**

4.13 Three strategic options were appraised (detailed matrices and maps are contained in Appendix 8). In summary the outcomes of those appraisals were:

### **EAST OF HARRY STOKE**

#### **4.14 Positives:**

- Opportunity to integrate a new community with planned community at Harry Stoke.
- Potential to provide new homes within walking distance to retail and cultural opportunities and cycle/short public transport trip to significant employment and higher, further and secondary education facilities.
- Proposed improvement to UWE campus will meet many cultural needs of the new community.
- Proposed public transport improvements (Rapid Transit Route through the site) provide opportunity to serve new community.
- Close proximity of Bristol Parkway provides opportunities for access to local and national rail network.
- Adjacent mixed uses generate opportunities to develop CHP/district heating networks.
- Development area does not contain and is adjacent to Conservation Areas, Listed Buildings or Scheduled Ancient Monuments.
- Community Forest path runs through this area.

#### **4.15 Negatives:**

- Reduction of 'green' entrance to Bristol/loss of greenfield land.
- Some impact on visually important slopes and ridge lines.
- Pylons run across the site.
- Railway line and A4174 could act as a barrier between new and existing communities as well as services and employment opportunities.
- Part of the development area is within SFRA flood zones.
- Reduced health due to noise pollution from A4174 and M32.
- Loss of Green Belt.

## LAND SOUTH OF THE A4174 RING ROAD

### 4.16 **Positives:**

- Potential to provide new homes within cycling distance to retail and cultural opportunities and cycle/short public transport trip to significant employment and higher, further and secondary education facilities.
- Proposed improvement to UWE campus will meet many cultural needs of the new community.
- Proximity of Bristol Parkway provides opportunities for access to local and national railway network.
- Adjacent mixed uses generate opportunities to develop CHP/district heating networks.
- Development is not within SFRA flood zones.
- Development area does not contain, or is adjacent to Conservation Areas, Listed Buildings or Scheduled Ancient Monuments.

### 4.17 **Negatives:**

- Loss of landscape corridor entrance to Bristol/Greenfield land.
- Development on Grade 1 agricultural land.
- Limited public transport in the immediate vicinity.
- The area is relatively isolated as A4174 and Simms Hill Woods act as a barrier between new and existing communities as well as services and employment opportunities.
- Development is not within walking distance of an existing or planned local centre. New local centre will need to be provided as part of the development.
- Reduced health due to noise pollution from M32 and A4174.
- Loss of Green Belt.

## LAND NORTH OF THE RAILWAY

### 4.18 **Positives:**

- Development would present a continuation/rounding off of existing housing areas and Parkway North and help to sustain existing local centre at Simmons View.
- Potential to provide new homes within walking distance to retail and cultural opportunities and cycle/short public transport trip to significant employment and higher, further and secondary education facilities.
- Proposed improvement to UWE campus will meet many cultural needs of the new community.
- Proposed public transport improvements (Rapid Transit route through the site) provide opportunity to serve new community.
- Close proximity of Bristol Parkway provides opportunities for access to local and national railway network.
- Development is not within SFRA flood zones.
- Nearby mixed uses generate opportunities to develop CHP/district heating networks.

- The ridgeline is already compromised by existing housing development.
- Development area does not contain, or is adjacent to Conservation Areas, Listed Buildings or Scheduled Ancient Monuments.

#### 4.19 **Negatives:**

- Development will impact on slopes and ridge lines / loss of Greenfield land.
- Railway line may act as a barrier between new and existing communities as well as services and employment opportunities.
- Reduced health due to noise pollution from M4 and M32.
- Loss of Green Belt.

### **PREFERRED OPTION**

#### **EAST OF HARRY STOKE AND NORTH OF THE RAILWAY.**

4.20 The combined Land East of Harry Stoke and North of the Railway are proposed for the following key reasons:

- Larger development area has greater propensity to support new local services and facilities and provide a richer mix of uses and make a substantive contribution to re-balancing land-uses in the North Fringe.
- The development area is not isolated representing a continuation of existing housing areas.
- New homes will be within walking distance to retail and cultural opportunities and cycle / short public transport trip to significant employment and higher, further and secondary education facilities.
- Proposed improvement to UWE campus will meet many cultural needs of the new community.
- The proposed Rapid Transit / Stoke Gifford Transport Link will provide significant improvements to public transport to serve new community(s).
- New community can help to sustain existing local centre at Simmons View.
- Close proximity of Bristol Parkway provides opportunities for access to local and national railway network.
- Development area does not contain, or is adjacent to Conservation Areas, Listed Buildings or Scheduled Ancient Monuments.
- Adjacent mixed uses and larger development area generates a significant opportunity to develop CHP/district heating networks.
- The ridgeline is compromised by existing residential development. New development will present an opportunity to develop 'gateway architecture' at this important entrance to Bristol / North Fringe.
- Opportunity to change the use of arable/pasture land in a corridor along the western edge of the M32 and M4 to woodland and other Green Infrastructure uses to support climate change mitigation, biodiversity and informal recreational opportunities.

4.21 Land South of the A4174 Ring Road has been excluded for the following key reasons:

- Access along Filton Road is poor and there is limited public transport in the immediate vicinity.
- Loss of Agricultural Grade 1 land.
- Simms Hill wood forms an important visual and physical edge to the built area framing the landscape corridor entrance to Bristol.
- The area is relatively isolated compared with the other options. The A4174 and Simms Hill woods act as a barrier between new and existing communities as well as services and employment opportunities.
- Development is not within walking distance of an existing or planned local centre.
- The area provides an opportunity for new sports, recreation and enhanced green infrastructure.

## **Yate & Chipping Sodbury Appraisal of Strategic Locations for Development (see also Appendix 9)**

### **Engine Common**

#### **4.22 Positives**

- Southern part of area of search has proximity to Yate train station (although walking/cycling routes need improving). Parking and passenger facilities at Yate station are poor.
- Southern part of the area of search has proximity to employment (industrial estates). However, range and types of jobs available are limited to mainly manual and semi-skilled.
- Proximity to some culture/ heritage (Yate Outdoor Sports Centre (YOSC), Yate Football Club, mining archaeology) however, Yate and Chipping Sodbury lack a wide range of cultural facilities, so out commuting for theatre, cinema, bowling, etc will occur.
- Potential for Combined Heat & Power (CHP) in southern part of area of search through linkages with Broad Lane employment area.
- Potential to connect into existing walking/cycle networks (but routes need improving/ extending). Of particular interest are routes to Brimsham Green School and YOSC from southern part of area of search, the connections to Public Rights of Way (PROW) across wider countryside and to the station and Yate town centre.
- Flat topography will not deter walking/cycling.
- Area does not contain any Strategic Flood Risk Assessment (SFRA) Level 3b areas (*NB Yate area data needs updating as part of Stage 2 report*) however, areas are SFRA level 3a.
- Sort-it Centre in close proximity to area.

#### 4.23 **Negatives**

- Known mining history with potential for contamination and disused mines in the area, restricting areas of development.
- Railway acts as a physical, visual and intangible barrier to services and facilities within central Yate.
- The development area contains a distinctive landscape and settlement pattern arising from the field patterns and dispersed village structure and character. Feeling of separation from Yate (Engine Common is a distinct rural settlement with its own identity). Impact of new development on distinctive landscape and settlement development pattern of Engine Common.
- Question the ability of the area to deliver a reasonable level of development to gain improvements to local facilities and services without harming the rural character, landscape, townscape and heritage qualities of the area. Any further development may be incongruous in this location.
- No opportunity to expand existing public open space to a reasonable scale.
- Poor public transport network at present to link new development to town centres, station or to key destinations. It is unlikely to be improved, even if it could be supported by an appropriate amount and density of development. It is unlikely that services would run through new development.
- Railway line and main road discourage movement by modes other than car.
- Limited local services and facilities (but may be sustained with some development).
- High ecological value of some sites with the development area, and the area includes Grade 1 agricultural land.
- Industrial archaeological value.
- No development can take place until essential improvements to the sewerage system within the settlement and downstream have taken place, as part of an overall drainage strategy.

#### **North Brimsham**

##### 4.24 **Positives**

- Development area has the potential, at an appropriate density, to deliver the vast majority of the housing required within the Area of Search, with associated local facilities and employment land, particularly if coupled with southern parts of the area of search at Yate Rocks. It can help to increase the self containment of Yate and Chipping Sodbury.
- There are no significant physical barriers to a linkage between the existing settlement and the new neighbourhood, however, it is essential that good movement networks are established across the whole new neighbourhood to deliver the connectivity and to create a sense of one whole community.

- The scale of the employment land capable of being delivered can offer a choice of types of job of the kind needed in Yate and Chipping Sodbury.
- The scale of development could support a local centre providing local shopping, primary schools, facilities and also provide for community uses including home working hub and improvements to YOSC that would benefit the adjacent existing housing and local community as well as the new neighbourhood.
- Opportunities for CHP and other sources of renewable energy linked to community facilities/YOSC/schools/local centre/employment sites.
- Relative proximity to employment in industrial estates – within cycling distance and possibility of enhanced public transport links.
- Scale of development could encourage a ‘through route’ for public transport, which could link to station, employment areas and to the town centres (around town services) improving services to the whole of North Yate and new development.
- The landscape features are capable of being utilised and enhanced within the new neighbourhood to create a Green Infrastructure (GI) framework and to support character.
- Links to footpaths and to local lanes will encourage walking and cycling for leisure.
- Site is visually and physically contained within boundaries of Tanhouse Lane, the railway and Yate Rocks ridge.
- Joining area to southern end of Yate Rocks will provide opportunities to connect development to Chipping Sodbury and beyond, as well as providing additional development to provide and sustain employment, services and facilities on site.
- Opportunity to expand existing Public Open Space (POS) adjacent to Brimsham Fields, creating a larger area of amenity and to link to/enhance other strategic GI corridors through the site.
- In this area, the Council understands that up to 500 units may be able to progress in advance of essential improvements to the sewerage system by use of the existing temporary storage facilities. However, development beyond 500 units requires works to the sewerage system within the settlement and downstream as part of an overall drainage strategy.

#### 4.25 **Negatives**

- Pylons are a visual and potential health issue.
- Currently poor public transport network in North Yate (although could be improved if supported by an appropriate amount and density of development).
- Additional traffic on Goose Green Way. If only one main access is provided at Randolph Ave, this puts significant pressure on this junction for all traffic movements.
- Limited local services and facilities with small shopping area and pub in Brimsham Park (but may improve with development).
- Goose Green Way segregates Engine Common from services and facilities within Yate.

- Town centre is at a distance which is not comfortable for walking or cycling.
- If new links through North Brimsham and to the west through the southern part of Yate Rocks are not provided, the site has the potential to become a suburban cul-de-sac physically and socially segregated from the community of Yate and Chipping Sodbury, which is not in the interests of good place making.
- Sewerage system needs significant improvement beyond the development of 500 units.

## **Yate Rocks**

### **4.26 Positives**

- Opportunity to utilise site topography to maximise passive energy efficiency measures.
- Opportunity to utilise topography for a pleasant layout.
- Ability to join the southern area with North Brimsham to optimise size of new neighbourhood in one location, improving social and physical connectivity to both town centres, improving the permeability and legibility of the new neighbourhood and improving access to the new facilities for both existing residents and new development.
- Links to PROW network within the Yate Rocks/Ridgewood area.

### **4.27 Negatives**

- Proximity to potential major sources of noise/ air pollution of the quarry - requires further investigation.
- Visual significance of the ridge landscape and proximity to the Yate Rocks settlement. Any development in this area needs to be approached with sensitivity to the landscape and community constraints.
- No opportunity to expand existing public open space unless part of North Brimsham development.
- Poor public transport network at present, and potentially too remote to encourage investment/use unless joined to North Brimsham development.
- Question the ability of the area to deliver a reasonable level of development to gain improvements to local facilities and services and not harm the rural character, landscape, and heritage qualities of the area unless joined with North Brimsham development.
- Limited local services and facilities in Brimsham Park.
- Links to Chipping Sodbury are poor, but capable of improvement. Potential to improve links with Chipping Sodbury High Street via Ridgewood and Stub Ridings.
- Links to Stub Ridings and YOSC are poor, but pedestrian and cycling links could be significantly improved if joined to North Brimsham development.
- Goose Green Way segregates services and facilities within Yate, exacerbated by area's distance from the town centre.

- No development can take place until essential improvements to the sewerage system within the settlement and downstream have taken place, as part of an overall drainage strategy.

### **North Chipping Sodbury**

#### **4.28 Positives**

- Mixed use development potential on brownfield land in the southern area only.
- Proximity of southern area to Chipping Sodbury town centre by walking and cycling.
- Potential to support nearby local facilities and public transport routes.
- Contains Stub Ridings and other leisure facilities.
- Potential of quarry for leisure/nature/ecology.

#### **4.29 Negatives**

- Potential issues with hydrology within the quarry must be resolved before development comes forward.
- Future use of the quarry void must be decided before development can come forward.
- Potential impact on heritage and Conservation Area.
- Area to east of Wickwar Road is clearly very open countryside – rural character.
- Potential impact on views to/from AONB.
- No opportunity to expand existing public open space.
- Poor public transport network at present (although could be improved if supported by an appropriate amount and density of development).
- Proximity of development area to quarries and associated noise/ air pollution.
- No schools within walking distance.
- Disconnection (except southern area by Barnhill quarry) from existing development.
- No development can take place until essential improvements to the sewerage system within the settlement and downstream have taken place, as part of an overall drainage strategy.

### **East Chipping Sodbury**

#### **4.30 Positives**

- Development area has the potential, at an appropriate density, to provide some of the required amount of housing with associated local facilities and employment land.
- Access from St John's Way.
- Potential to support nearby facilities in Chipping Sodbury.
- Potential to support/improve public transport.
- Potential to utilise/enhance existing River Frome corridor and control flooding.

- Potential to enhance walking/cycling networks through existing housing to Chipping Sodbury High Street.
- Some employment land to the east of the settlement of Yate/Chipping Sodbury may balance movement within settlement.
- Potential for some provision of renewable energy.

#### 4.31 **Negatives**

- Chipping Sodbury has a historic market town character with a clear relationship to its rural setting on the north and east. Development on St John's Way will harm this character and relationship.
- Adjacent to ancient commons and to the AONB.
- Open countryside and rural character and way of life is significant and will be adversely affected by any development.
- Development here cannot be visually contained without significantly changing the nature and character of the landscape of the area and of the tranquillity and setting of the AONB.
- St John's way provides a clear boundary between the existing settlement and open countryside.
- Public engagement has demonstrated significant concern about growth in this area.
- The existing area suffers from areas of significant flooding (SFRA 3a).
- No development can take place until essential improvements to the sewerage system within the settlement and downstream have taken place, as part of an overall drainage strategy.
- No opportunity to expand existing public open space (but development could provide some additional).
- Public transport network needs to be improved and supported by an appropriate amount and density of development.
- Employment land may not be large enough to support the future needs/diversity of employment of the Yate/Chipping Sodbury community.
- Proximity to M4 junction will result in easy out-commuting, undermining the vision to strengthen the self-containment of the towns.
- Limited access to the area limits permeability and may result in a 'cul de sac' form of development.
- Distance from station and main employment areas in Yate is a disincentive to walking and cycling and has the potential to increase congestion in peak hours.
- Facilities not sufficient for small CHP, unless supported by employment uses.

### **Preferred Option**

#### 4.32 **North Brimsham with southern area of Yate Rocks**

- Existing area has a limited number of constraints to development.

- Potential to provide all housing required in area of search and to develop comprehensively with a mix of uses, facilities and services that will support new development and also existing community.
- Potential to create a sense of place, connecting with the existing communities of Yate and Chipping Sodbury and bringing benefits to the existing settlement but without compromising the valued landscape and community of Yate Rocks.
- The scale of the employment land capable of being delivered can offer a choice of types of job of the kind needed in Yate and Chipping Sodbury.
- Provision of public transport improvements to the whole of North Yate community, not just new neighbourhood.
- Potential for the provision of links from new neighbourhood to Chipping Sodbury.
- Limited negative impact on the existing community.
- The area is physically and visually contained, with potential to support and enhance natural assets and landscape features.
- Delivery of housing can begin at North Brimsham in advance of essential improvements to the local and downstream sewerage system.

## **Appraisal of Housing Opportunity at Thornbury (see also Appendices 10 and 11)**

4.33 Policy CS33 of the Core Strategy promotes land to the north of Thornbury as a potential location for future housing development, subject to the results of further technical work. The growth proposed is required to support the town centre and primary schools. In addition, the population profile of Thornbury is aging at a faster rate than the rest of South Gloucestershire and the total population has declined in recent years. New housing will provide an increased amount of family housing to encourage younger families to move to the town.

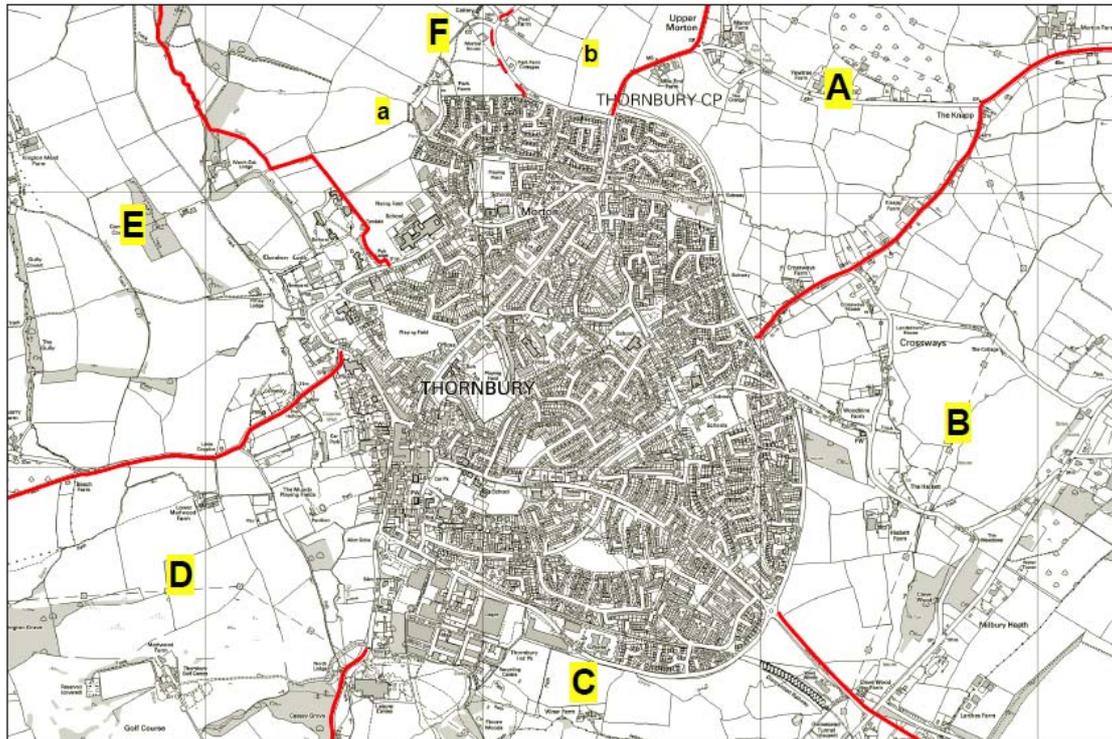
4.34 Three stages of assessment and appraisal were undertaken which led to the identification of that area:

- Accessibility Assessment
- Sustainability Appraisal of broad area of search
- Sustainability Appraisal of broad options for consultation

### ***Accessibility Assessment***

4.35 One of the primary aims of any housing development would be to enhance the vibrancy of the town centre. An Accessibility Assessment has therefore been conducted for Thornbury to assess walking distances from the town centre as development at distances from the town centre that are too far for comfortable walking would not be likely to increase town centre patronage.

4.36 The edge of Thornbury was split into six broad areas of search for analysis. Facilities and services that fell within 400, 800 and 1200 metres of a central point within each area of search were mapped.



**Map to show the six broad areas of search**

4.37 400, 800 and 1200 metres were chosen as those are generally considered in best practice to represent 5, 10 and 15 minute walking times respectively. *Building Sustainable Transport in New Development* (Department for Transport April 2008) states that a range of facilities should be present within 800 metres (10 minutes) of new dwellings. Recommended distances of new dwellings from facilities varies somewhat among different publications, however it is normally agreed that key facilities should be no further than 1000 metres away from new dwellings. Results are indicative and do not reflect accurate distances from all loci within each area. Distances were measured ‘as the crow flies’, therefore actual walking distances along pavements are likely to be longer in real life than those indicated. Area F has been split into two parts (a - west and b - east) for the purposes of the accessibility study due to its large size.

***Sustainability Appraisal of Broad Areas of Search***

4.38 Each of the six broad areas were appraised against the SA Framework. This appraisal drew on the results of the accessibility assessment. The SA matrices of the areas of search are contained in Appendix 10. Summaries of the results of the accessibility assessments and sustainability appraisal of each area are given below.

**Area A North East of Thornbury**

Within 400 metres of:

- Equipped Osprey Park play area

Within 800 metres of:

- Christ the King primary school
- Newsagents/convenience store, Primrose Drive

Within 1200 metres of:

- Doctor's surgery
- Castle secondary school
- Crossways and Manor Brook primary schools

Advantages:

- Less harm to important landscapes.
- No impact on historic character.
- Access to primary school and Primrose Drive newsagent/convenience store

Disadvantages:

- No services within five minute walking distance (except children's play equipment).
- Town centre not within convenient walking distance.
- Breaches Morton Way 'boundary'.
- No statutory biodiversity designations, however national priority species are present in parts of the area.

### **Area B East of Thornbury**

No facilities within 400 metres.

Within 800 metres of:

- Crossways primary school

Within 1200 metres of:

- Midland Way employment
- Streamleaze equipped play area
- Christ the King primary school

Advantages:

- Less harm to important landscapes.
- Less impact on historic character.
- Basic local centre/convenience store within 15 minute walking distance, however this is the only facility within that distance.

Disadvantages:

- Poor access to High Street.
- Breaches Morton Way 'boundary'.
- Area contains two Sites of Nature Conservation Interest (SNCI), ponds and hedgerows of interest to wildlife.
- No facilities within a five minute walk.

### **Area C South of Thornbury**

Within 400 metres of:

- Midland Way employment

Within 800 metres of

- Streamleaze equipped play area

Within 1200 metres of:

- Town centre
- Gillingstool and Christ the King primary schools
- Supermarket
- Leisure centre

Advantages:

- Excellent access to Midland Way employment centre.
- Less impact on historic character.
- Reasonable access to bus route along Bristol Road.

Disadvantages:

- Isolated from High Street by Midland Way employment estate.
- Poor access to schools.
- Landscape setting of Thornbury adversely affected – site is located on important ridgeline.
- Some ecological interest associated with several ponds and areas of grassland.
- In Green Belt.
- Development likely to exacerbate drainage/flooding issues in existing built up areas to the south.

#### **Area D South West of Thornbury**

Within 400 metres of:

- Town centre
- Midland Way employment
- Supermarket
- Leisure centre
- Mundy playing fields equipped play area

Within 800 metres of:

- Gillingstool primary school
- Office employment, Castle Street

Within 1200 metres of:

- Doctors surgery
- Secondary school
- St Mary's primary school

Advantages:

- Excellent access to the High Street shops and services.
- Very good access to Midland Way employment.
- Excellent access to leisure centre.
- Excellent access to allotments.

Disadvantages:

- In the Green Belt
- Potential flooding issues to resolve.
- Mixture of ecological habitats of interest.
- Potential large impact on landscape and historic character – area partly within Conservation Area.

### **Area E West of Thornbury**

Within 400 metres of:

- Town centre
- St Mary's primary school
- Office employment, Castle Street

Within 800 metres of:

- Secondary school
- Gillingstool primary school
- Supermarket
- Mundy playing fields and Tilting Road equipped play areas

Within 1200 metres of:

- Doctors surgery
- Leisure centre
- Manor Brook primary school

Advantages:

- Close to High Street shops and services, however it is unclear how good access could be gained.
- Relatively little ecological interest compared to other areas.
- Better access to schools than Area 4.

Disadvantages:

- In the Green Belt.
- Potential large impact on landscape and historic character – area partly within Conservation Area.
- Potential flooding issues to resolve.

### **Area Fa North of Thornbury**

Within 400 metres of:

- Secondary school

Within 800 metres of:

- Manor Brook and St Mary's primary schools
- Major employment

Within 1200 metres of:

- Town centre
- Doctors surgery
- Supermarket
- Equipped play area

### **Area Fb North of Thornbury**

No facilities within 400 metres.

Within 800 metres of:

- Manor Brook primary school
- Major employment

Within 1200 metres:

- Doctors surgery

- Supermarket
- Equipped play area
- Newsagents/convenience store

*Fa and Fb advantages:*

- Good access to the High Street, particularly to the west of the area (Fa).
- Excellent access to secondary school.
- Not in the Green Belt, so no revision to Green Belt boundary necessary.
- Little ecological interest.

*Fa and Fb disadvantages:*

- Potential flooding issues to resolve.
- Parts of area have important landscape value.
- Potential impact on nearby Conservation Area and historic character/listed buildings.

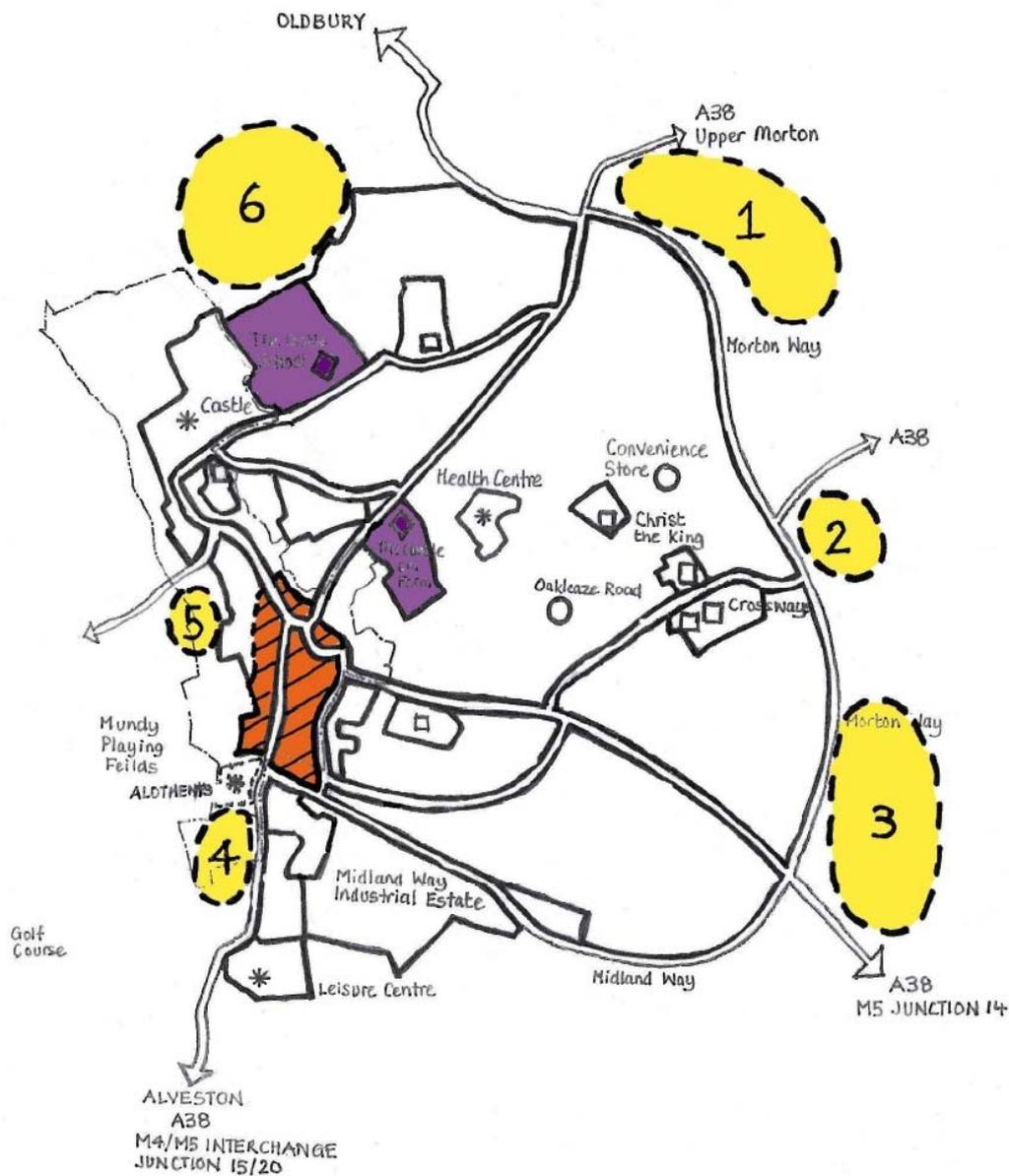
**Options presented for informal community engagement, October 2009**

4.39 The Sustainability Appraisal of Area C (land to the south of Thornbury) had shown that area as being the most unsustainable for three main reasons:

- development would exacerbate flooding problems on land downstream in the existing built up area of Thornbury;
- the area's high landscape value due to the presence of a prominent ridgeline; and
- any development would be isolated from the town centre by the Midland Way employment area.

4.40 For these sustainability reasons Area C was not taken forward for further consideration.

4.41 The appraisals of the areas of search, together with submissions by third parties to the Council, were used to inform the drafting of six potential broad options for the location of possible development, honed down from the broad areas of search:



- Option 1: Potential Growth 350—400 houses
- Option 2: Potential Growth 90—110 houses
- Option 3: Potential growth 750—900 houses
- Option 4: Potential Growth 90—100 houses
- Option 5: Potential Growth 40—50 houses
- Option 6: Potential Growth 500—600 houses

SA matrices for each of the six options are contained in Appendix 11.

**Preferred Option: Option 6**

4.42 Option 6 has been taken forward for inclusion in the Core Strategy as an area of housing opportunity (not as a formal site allocation). Option 6's

strengths are broadly equivalent to those of the Area of search Fa. Its inclusion is due to its strengths of relative close proximity to the town centre compared to options adjacent to Morton Way and for not being located within the Conservation Area. Option 6 also benefits from general community support demonstrated at the Thornbury Workshop and during the informal consultation. In addition, development may help to fund redevelopment and/or consolidation of the Castle School.

4.43 However further technical work must be undertaken to demonstrate that any development to the north of Thornbury will not negatively impact on the setting of Thornbury Castle (listed building) and nor would it result in an increased risk of flooding on or off site. These requirements have been included within Policy CS33 and therefore the policy scores highly against various SA objectives.

4.44 One of the main sustainability strengths of the site is its relative close proximity to the town centre compared with possible sites to the east of the town along Morton Way. In order to gain the maximum benefit from this proximity it will be vital that any development is well linked to the town centre by walking, cycling and public transport. Pedestrian/cycle and public transport only access will therefore need to be provided along the edge of the playing field to the west of the Castle School. Main vehicular access for residents travelling by private car to and from the site would need to be gained from Butt Lane to the east. Direct access for general development traffic will not be permitted onto Park Road as the route along Park Road and Castle Street to the Town Centre is unsuitable to accommodate the associated development traffic. Any increase in traffic along this route would have an adverse effect on the safety of all road users and on residential amenity and the character of the Conservation Area.

## 5. Appraisal of Policies

5.1 In this section all policies contained in the Core Strategy are appraised. Those policies that relate to the allocation of the new neighbourhoods are appraised in terms of their specific requirements for development. The strategy for development and the reasons for choosing particular sites are appraised in Sections 3 and 4. All policies are appraised against the reasonable alternative of not implementing the policy.

### Policy CS1 Design

5.2 This is a key policy in the Core Strategy which aims to deliver high quality design and distinctiveness in all new development. The policy scores highly against the following sustainability objectives:

- SA Objective 1: Improving health, reducing health inequalities and promoting healthy life styles: development that contributes to well being through pleasant surroundings and living conditions, well designed housing, lifetime homes, attractive public spaces and green corridors, facilities to encourage social networking and physical activity, development that avoids pollution/noise, access to public transport and encourages walking and cycling.
- SA Objective 2: Supporting communities that meet people's needs: design that ensures access to schools, colleges, libraries and other community facilities and services, design which reduces crime and the fear of crime, patterns of development which allow people to meet and increases access to and participation in cultural activities by preserving/ conserving cultural heritage.
- SA Objective 4: Provide access to meet people's needs with least damage to communities and the environment: development patterns which provide for good public transport, walking cycling to help everyone access easily and safely and affordably.
- SA Objective 5: Maintain and improve environmental quality and assets: development that safeguards and enhances features of landscape, nature conservation, heritage and townscape, takes account of opportunities for local food production, avoids areas of risk from flooding and where appropriate manages flood risk sustainably.
- SA Objective 6: Minimises pollution and consumption of natural resources: development which reduces non renewable energy consumption and 'greenhouse' emissions through building design and orientation and the use of sustainable materials, use of renewable and/or low carbon energy installations, encourages recycling, maximises use of rain and grey water and expects/seeks 'very good' standard Building for Life and BREEAM very good (or alternative equivalent standard).

5.3 This policy is essential to delivering sustainable development through the Core Strategy. Without this policy a fundamental element of the Core

Strategy would be omitted and the document would not fulfil its required function. This policy covers additional issues that are not addressed by current Local Plan policies.

## **Policy CS2 Green Infrastructure**

5.4 In order for developments to contribute to sustainable communities they must be accompanied by a range of infrastructure provision. National policy (in particular PPS12) sets out that along with the necessary social and physical infrastructure development must also orchestrate the necessary green infrastructure to ensure sustainable communities are delivered. The policy encapsulates a range of Sustainability Appraisal high level objectives, in particular 1, 2, 4, and 5.

5.5 The policy scores highly against the following objectives:

- Promotes healthy lifestyles (SA objective 1.3)
- Promotes stronger more vibrant communities (SA objective 2.4)
- Increases access to cultural attractions (SA objective 2.5)
- Increases choice of method of travel (SA objective 4.1) by providing and promoting non-car routes of travel.
- Makes cycling and walking easier and more attractive (SA objective 4.4)
- Protects and enhances habitats and species (SA objective 5.1)
- Promotes the conservation of land (SA objective 5.2)
- Reduces vulnerability to flooding (SA objective 5.6) by providing mitigation and adaptation opportunities to address the challenges of climate change.

5.6 The policy will help to ensure that sustainable communities are delivered in line with high level sustainability objectives. The existing Local Plan does not recognise in a single overarching policy, the importance and range of benefits that Green Infrastructure brings now, throughout the strategy period and beyond. Without implementing Policy CS2 it is likely that many of the sustainability objectives would not be delivered or considered in a coherent way and that the full range of multi-functional benefits may be missed. Therefore the alternative of no policy or 'business as usual' would not be as sustainable as adopting and successfully implementing Policy CS2.

## **Policy CS3 Renewable, Low Carbon & Decentralised Energy Generation**

5.7 The policy sets out the high priority that will be given to renewable and low carbon energy generation in South Gloucestershire. The policy scores highly against a range of the Sustainability Appraisal high level objectives, in particular 3, 4, 5 and 6, and scores highly against the following sub-objectives:

- Meets needs locally and reduces the vulnerability of the economy to climate change and harnesses opportunities arising from development (SA sub-objective 3.4 and 3.6)
- Helps everyone to access basic services (SA sub-objective 4.2)
- Promotes the conservation and wise use of land (SA sub-objective 5.2)
- Protects and enhances landscape and townscape (SA sub-objective 5.3)
- Reduces vulnerability to flooding and sea level rise (SA sub-objective 5.6)
- Reduces non-renewable energy consumption and greenhouse emissions (SA sub-objective 6.1)
- Minimises consumption and extraction of minerals (SA sub-objective 6.3)

5.8 The policy sets out South Gloucestershire's positive position on renewable and low carbon energy generation. The policy seeks to strike a balance between potential harm and the potential impacts of climate change and assists with delivering sustainable communities. The existing Local Plan does not contain such a policy. Therefore the alternative of no policy or 'business as usual' would not create sustainable energy generation opportunities as effectively.

#### **Policy CS4 Renewable or Low Carbon District Heat Networks**

5.9 The policy sets out the necessary consideration that needs to be given to renewable or low carbon district heat networks. The policy scores highly against a number of the sustainability appraisal high level objectives, in particular 3 and 6, and scores highly against the following sustainability appraisal sub-objectives:

- Meets needs locally and reduces the vulnerability of the economy to climate change and harnesses opportunities arising from development (SA sub-objective 3.4 and 3.6)
- Reduces non-renewable energy consumption and 'greenhouse emissions' (SA sub-objective 6.1)
- Minimises consumption and extraction of minerals (SA sub-objective 6.3)
- Reduces waste not put to any use (SA sub-objective 6.4)

5.10 The policy sets out South Gloucestershire's requirements to seek the construction of necessary network infrastructure and encourage the connection, in order to increase the use of district heat networks. The policy has a positive impact on addressing the challenge of climate change and assists with delivering sustainable communities. The existing Local Plan does not contain such a policy. Therefore the alternative of no policy or 'business as usual' would not create sustainable heat network opportunities as effectively.

### **Policy CS5 Location of Development**

5.11 This is the policy expression of the Strategy for Development. As the Strategy has been appraised in Section 3, it is not necessary to repeat that appraisal here.

### **Policy CS6 Infrastructure & Developer Contributions**

5.12 This is the policy expression of the strategy for working with partners to deliver infrastructure, services and community facilities to improve the sustainability of our communities. As the strategy has been appraised within the Housing and Community Infrastructure policies CS16 to CS24, it is not necessary to repeat that appraisal here.

### **Policy CS7 Strategic Transport Infrastructure & Initiatives**

5.13 Relieving congestion is paramount to the continued economic prosperity of South Gloucestershire, to the health and well-being of its residents and to climate change mitigation objectives. Delivery of enhanced travel options to significant destinations, by means other than the private car is therefore a priority.

5.14 The policy encapsulates a range of Sustainability Appraisal high level objectives, in particular 1, 3, 4, and 6. The policy scores highly against the following sustainability objectives:

- Improve health (SA objectives 1.1 and 1.3)
- Develop the economy in ways that meet people's needs by giving everyone in the district access to satisfying work opportunities (SA objective 3.1)
- Provide access to meet people's needs with least damage to communities and the environment by reducing the need/desire to travel by car, help everyone access basic services easily, safely and more affordably and making public transport, cycling and walking easier and more attractive (SA objectives 4.1, 4.2 and 4.3)
- Minimise pollution and consumption of natural resources by reducing non-renewable energy consumption and 'greenhouse emissions' and minimise land, water, air, light noise and generic pollution (SA objectives 6.1 and 6.5)

5.15 Without implementing Policy CS7 it is likely that the sustainability objectives would not be delivered and would not be consistent with the Sustainable Community Strategy's priority of managing future development in a positive way. Therefore the alternative of no policy or 'business as usual' would not be as sustainable as adopting and successfully implementing Policy CS7.

## **Policy CS8 Improving Accessibility**

5.16 The policy ensures that priority is given to providing users of new development with a range of travel options other than the car. The policy considers location of development, off-site mitigation, the provision and promotion of sustainable travel options, and demand management. The policy scores highly against a number of the Sustainability Appraisal high level objectives, in particular 1, 2, 4 and 6, and scores highly against the following sub-objectives:

- Improves health, by creating options for travel by means other than the car and promotion healthy lifestyles (SA sub-objectives 1.1, 1.2 and 1.3)
- Promotes stronger more vibrant communities, by creating links between locations (SA sub-objectives 2.4)
- Reduces the need and desire to travel longer than walking distance (SA sub-objectives 4.1)
- Helps everyone have access to basic services safety (SA sub-objectives 4.2)
- Makes public transport, cycling and walking easier and more attractive (SA sub-objectives 4.3)
- Reduces 'greenhouse' emissions (SA sub-objectives 6.1)
- Minimises air and noise pollution (SA sub-objectives 6.5)

5.17 The policy sets out South Gloucestershire's requirements to seek opportunities to promote sustainable modes of transport and improves accessibility. The existing Local Plan does contain various related policies; however the scope of Policy CS8 is broader in its approach to improving accessibility by a range of methods. Therefore the alternative of no policy or 'business as usual' would not adequately improve accessibility. Introducing the policy would lead to more sustainable development and address some of the key issues facing South Gloucestershire.

## **Policy CS9 Environmental Resources & Built Heritage**

5.18 The policy sets out the general approach to environmental resources and the built heritage in South Gloucestershire. The policy scores highly against a range of the Sustainability Appraisal high level objectives, in particular 1, 2, 3, 5 and 6, and scores highly against the following sub-objectives:

- Improves health (SA sub-objective 1.1)
- Reduces health inequalities (SA sub-objective 1.2)
- Increases access to and participation in cultural activities (SA sub-objective 2.5)
- Meets needs locally (SA sub-objective 3.4)
- Protects and enhances habitats and species (SA sub-objective 5.1)

- Promotes the conservation and wise use of land (SA sub-objective 5.2)
- Protects and enhances landscape and townscape (SA sub-objective 5.3)
- Values and protects diversity and local distinctiveness including rural ways of life (SA sub-objective 5.4)
- Maintains and enhances cultural and historical assets (SA sub-objective 5.5)
- Reduces vulnerability to flooding and sea level rise (SA sub-objective 5.6)
- Keeps water consumption within local carrying capacity limits (SA sub-objective 6.2)
- Minimises consumption and extraction of minerals (SA sub-objective 6.3)
- Minimises land, water, air, light and generic pollution (SA sub-objective 6.5)

5.19 The policy seeks to protect environmental resources and built heritage as well as ensuring that South Gloucestershire's high quality natural environment is conserved and where possible enhanced. The Core Strategy must consider the management of environmental resources and built heritage assets as set out in national planning policy.

### **Policy CS10 Minerals**

5.20 National policy requires that provision is made for a steady and adequate supply of minerals to support the economy and that the supply is protected for the longer term. Policy CS10 reflects this national requirement.

5.21 This policy contributes positively to the following sustainability objectives:

- SA Objective 3: Give everyone access to satisfying work opportunities: by ensuring that jobs in the mineral extraction industry in South Gloucestershire are retained or could be created in the future by maintaining a landbank of mineral reserves and identifying Mineral Safeguarding Areas.
- SA Objective 5: Maintain and improve environmental quality and assets by ensuring the wise use of mineral resources and preventing their permanent sterilisation.
- SA Objective 6: Minimise consumption and extraction of minerals: by providing only for that which is needed.

5.22 Without this policy the key objective of minimising the consumption of natural resources would be less likely to be delivered. Additionally, safeguarding this resource ensures that it is available for future generations.

## **Policy CS11 & Policy CS12 Safeguarded Areas for Economic Development**

5.23 Policy C11 is a summary of the amount and distribution of employment land and therefore as a statement of fact does not need to be appraised. The primary aim of Policy CS12 is to ensure continuing economic prosperity in the context of sustainable communities and so scores highly against several sustainability objectives.

5.24 Policy CS12 gives long term protection to an area's economic development use whilst allowing for flexibility so as to achieve development which would contribute to the range and number of jobs and overall sustainability of an area. In determining which site to safeguard various criteria were considered to ensure that the sites chosen were in sustainable locations where they could be accessed by non car modes or public transport. The East Fringe of Bristol urban area, some villages and Yate/Chipping Sodbury have a poor ratio of jobs to resident workers whilst in the North Fringe there are twice as many jobs as workers. Sites have been safeguarded or released for housing to try to achieve a better balance of jobs/homes across the district, therefore reducing the need to commute by car for work. The policy therefore scores highly against the following SA Objectives:

- Give everyone access to work opportunities (Objective 3.1)
- Help everyone afford a comfortable standard of living (Objective 3.2)
- Reduce poverty and income inequality (Objective 3.3)
- Meeting employment needs locally (Objective 3.4)
- Increase the circulation of wealth in the area (Objective 3.5)

## **Policy CS13 Non Safeguarded Economic Development Sites**

5.25 The policy seeks to manage change on economic development sites to ensure that continued economic use or mixed use is the preferred option to wholly residential use. This is to prevent the continued loss of employment land from villages and urban areas which has created an imbalance between jobs and workers and resulted in high levels of commuting from some areas. The policy should help to provide for the needs of small and starter businesses and help the retention of small businesses which provide services as well as jobs in local communities.

5.26 The policy therefore scores highly against the following sustainability objectives:

- Improve health (SA objective 1.3) – by providing better access to satisfying work that people can walk or cycle to.
- Seeking to ensure a range of employment is available locally across all communities (3.1, 3.4).
- Maximise potential to use non car modes to get to work (4.1, 4.4).

5.27 If sites were not safeguarded or released as proposed in Policy CS12 and CS13 then in some parts of the district market forces would be likely to

result in unsustainable residential development which would reduce local job opportunities and increase unemployment. In the North Fringe increased investment in employment would exacerbate the existing 2:1 ratio of jobs to resident workers. These processes would reduce the ability for workers to travel by foot or cycle and exacerbate long distance commuting patterns.

5.28 South Gloucestershire plays an important role in the economy of the region. If a supply of land for a range of businesses were not maintained and protected continued economic growth and prosperity would be undermined.

### **Policy CS14 Town Centres & Retail & Policy CS15 Distribution of Housing**

5.29 These policies are the policy expressions of the Strategy for Development. As the Strategy has been appraised above in Section 3 it is not necessary to appraise the policies in addition.

### **CS 16 Housing Density**

5.30 The aim of policy CS16 Housing Density is to:

- make efficient use of land, thereby minimising land take elsewhere;
- support local facilities and services by increasing access to them from residential areas over a shorter distances particularly by means other than the private car;
- sustain service nodes, improving them as focal points particularly for good public transport services.

5.31 It contributes positively to the Sustainability Appraisal objectives as follows:

- **Improve Health:** By enabling people to walk or cycle to local facilities and services, higher density housing will promote healthier lifestyles.
- **Support Communities that meet people's needs:** Appropriate density policies will help ensure a range of housing is available to meet a mixture of needs and provide greater opportunities for people in a neighbourhood to meet at local centres and participate in local activities.
- **Develop the economy in ways that meet people's needs:** Higher densities will help to sustain neighbourhood centres and ensure more local needs can be met within the area.
- **Provide Access to meet people's needs:** Appropriate density targets will reduce the need to travel other than by walking and cycling, making public transport, cycling and walking more attractive, and improving access to basic services.
- **Maintain and improve environmental quality and assets and 6 Minimise pollution and the consumption of resources:** Higher densities, in minimising land take, will promote the wise use of land, indirectly protecting other landscapes and species, and help reduce pollution and the consumption of natural resources

by encouraging more sustainable means of travel. Implemented alongside high quality design objectives contribute to local distinctiveness.

5.32 Without this policy the key sustainability aims of making efficient use of land, encouraging more sustainable means of travel than the car and sustaining local services would be less likely to be delivered.

### **CS17 Housing Diversity**

5.33 The aim of the housing diversity policy is to ensure the provision of a wide mix of housing to meet both open market demand and housing need for a wide range of different types of households.

5.34 The policy contributes positively to Sustainability Objectives as follows:

- **Improve Health:** By ensuring that all households have an opportunity to achieve decent housing, a diverse range of housing will reduce health inequalities and promote healthy lifestyles.
- **Support Communities that meet people's needs:** It will help make suitable housing available and affordable for everyone and will contribute to the maintenance of local communities.
- **Develop the economy in ways that meets people's needs:** Improved housing diversity will help ensure that local housing needs are met in the local area and help tailor the type of housing to resources available to individual households.
- **Provide Access to meet people's needs:** Housing diversity will make it easier for households to find accommodation in their local area and reduce the need for travel especially where this enables social ties and home/employment links to be maintained.
- **Maintain and improve environmental quality and assets and Minimise pollution and the consumption of resources:** Housing diversity will have a marginal impact on SA Objectives 5 and 6 although diversity can support local distinctiveness and will indirectly help reduce energy consumption if it reduces the need to travel.

5.35 Without this policy the aim of delivering a wide mix of housing to meet a variety of needs and market demand would not be met. This would be detrimental to achieving inclusive and thriving communities.

### **Policy CS18 Affordable Housing**

5.36 The West of England Strategic Housing Market Assessment (May 2009) indicates that there is an existing backlog in the need for affordable housing in South Gloucestershire with continuing future need requiring on average around 900 new affordable homes a year. The relatively small stock of existing affordable housing will not provide sufficient re-lets through turnover to satisfy this need.

5.37 The aim of the policy is to ensure that the majority of the larger sites developed for housing (10 plus dwellings in urban areas, 5 plus dwellings in rural areas) make an on-site contribution to the provision of affordable housing in order to meet the identified needs of households unable to meet their housing need in the open market. The policy contributes positively to the following Sustainability Objectives:

5.38 Improve Health: Affordable housing will:

- Help to provide decent modern housing provision for all sections of the population, particularly those who cannot afford to buy or rent on the open market; and
- contribute to a healthier population and reduce health inequalities by
  - reducing overcrowding and the ill-health it can cause,
  - reducing the numbers housed in poorly maintained accommodation,
  - providing access to modern household facilities.

5.39 Support Communities that meet people's needs: Affordable Housing will:

- ensure that communities are mixed and inclusive by providing for a range of households to live within them; and
- contribute to stronger more diverse communities in which family and friendship ties and social support can be maintained.

5.40 Develop the economy in ways that meets people's needs: Affordable Housing will help:

- to achieve more comfortable standards of living by providing decent subsidised housing for those unable to access it on the open market;
- to enable people to work in the local area if they can find housing there; and
- to widen the opportunities for home ownership through the provision of intermediate housing products e.g. shared equity, and improve access to housing generated wealth.

5.41 Provide Access to meet people's needs: Affordable Housing will help reduce the need to travel for households whose housing needs are met if it enables people to live closer to their work and/or families.

5.42 Maintain and improve environmental quality and assets: Affordable Housing will help to promote diversity, local distinctiveness, and rural ways of life if it results in local people continuing to be able to live within their communities and take part in community activities.

5.43 Affordable housing may have an adverse effect on the environment if it is poorly designed or located but PPS3: Housing is clear that all housing developments should achieve high quality design and other policies in the Core Strategy (for example Policies CS1 High Quality Design and CS9 Environmental Resources and Built Heritage) should ensure that environmental impact can be reduced.

5.44 Minimise pollution and the consumption of resources. Affordable housing will not generally result in any greater use of natural resources than market housing; indeed its use of smaller, often brownfield, sites tends to minimise land consumption. In addition from 2008 all new social housing must be built to Level 3 of the Code for Sustainable Homes, designed to reduce carbon emissions from buildings, so affordable housing may result in less carbon emissions than market housing where the code is not yet mandatory.

### **Policy CS19 Rural Housing Exception Sites**

5.45 The West of England Strategic Housing Market Assessment, May 2009 indicates that there is a high need for affordable housing in South Gloucestershire including in the rural areas, when compared to the potential housing supply and the relatively small stock of existing affordable housing.

5.46 The aim of the policy is to achieve a positive contribution to the provision of affordable housing in the rural areas in order to meet the identified needs of households unable to meet their housing need in the open market and in doing so to promote inclusive and thriving rural communities.

5.47 This policy therefore contributes positively to the following sustainability objectives:

- Improve health:
  - providing affordable housing in locations where there is an identified need and a local connection, thereby encouraging social networking and reducing stress caused by being in housing need.
- Support communities that meet people's needs:
  - providing suitable affordable housing in locations where there is identified need;
  - promoting stronger, more vibrant rural communities.
- Develop the economy in ways that meet people's needs:
  - Give everyone access to satisfying work opportunities – providing residential accommodation in rural areas so people can live close to their work.
  - Help everyone afford a comfortable standard of living – providing affordable housing.

5.48 The policy does allow for affordable housing to take place in locations where market housing would not normally be allowed and therefore there is potential for some negative impact on SA Objective 5: Maintain and improve environmental quality and assets. However this approach to the provision of rural affordable housing is in line with government guidance in PPS3: 'Housing'. In addition the supporting text to the policy together with other policies in the Core Strategy (for example Policies CS1 High Quality Design and CS9 Environmental Resources and Built Heritage) should ensure that environmental impact can be reduced.

5.49 Without this policy the need for affordable housing in the rural areas would be unmet as new market housing in this area of restraint will not reach

the levels required to deliver sufficient affordable homes through Policy CS18: Affordable Housing.

## **Policy CS20 Extra Care Housing**

5.50 The strategic importance of Extra Care as an alternative accommodation choice for older people is reflected in the South Gloucestershire Sustainable Community Strategy (February 2008).

5.51 Extra Care Housing is designed to be a home for life. The aim of this policy is to promote independent living in self-contained accommodation, where people are able to readily access high quality, flexible support and care services on site to suit their needs.

5.52 This policy therefore contributes positively to the following sustainability objectives:

- SA Objective 1: Improving health
- SA Objective 2: Supporting communities that meet people's needs by making suitable housing available and affordable for everyone and promoting stronger, more vibrant communities.
- SA Objective 3: Developing the economy in ways that meet people's needs by helping everyone afford a comfortable standard of living and meeting local needs locally.

5.53 Without this policy the aim of creating mixed and balanced communities for sustainable development will not be met and the opportunity for sufficient good quality housing of the right type and mix to meet the identified needs of different groups in society will not be made available. Therefore the alternative of no policy or 'business as usual' would not be as sustainable as adopting and successfully implementing Policy CS20.

## **Policy CS21 Gypsies and Travellers**

5.54 The West of England Gypsy and Traveller Accommodation Assessment (GTAA) established that there was a need for 58 residential pitches and 25 transit pitches to be provided in the period 2006 - 2011 and a further 22 pitches up until 2016 thereafter.

5.55 The aim of this policy is to provide new pitches in South Gloucestershire for Gypsy/Traveller accommodation to meet the required need, providing them with access to appropriate housing and as such enabling better access to services for Gypsy and Traveller families.

5.56 In ensuring this provision, this will achieve a marked reduction in the levels of unauthorised occupations and achieve improvements in the quality of Gypsy and Traveller accommodation, and access to services within our communities. An informed balancing of ecological, social and economic

sustainability factors is particularly important in the consideration of Gypsy/Traveller site development. Of the sustainability objectives, those which have particular resonance for site development relating to the disadvantaged nature of many families within the Gypsy/Traveller community are:

- SA Objective 1: Ensuring a strong, healthy and just society
- SA Objective 2: Communities which are inclusive, stronger, safe and crime free
- SA Objectives 3 & 4: Giving priority to ensuring access for all to jobs, health, education, shops, and leisure and community facilities.

5.57 Without this policy the urgent need for Gypsy/Traveller pitches would be unmet, resulting in continuing high numbers of unauthorised encampments which give rise to anxiety and community discord. Therefore the alternative of no policy or 'business as usual' would not be as sustainable as adopting and successfully implementing Policy CS21.

### **Policy CS22 Travelling Showpeople**

5.58 A process of moderation using Council service provider data will be conducted in relation to Travelling Showpeople in order to establish the identified need for the district.

5.59 The aim of this policy is to provide new plots in South Gloucestershire for Travelling Showpeople to meet their required accommodation needs, providing them with access to appropriate housing. This policy contributes to the following sustainability objective:

- SA Objective 2: Supporting communities that meet people's needs by providing suitable housing available and affordable for Travelling Showpeople in locations where there is identified need and promoting stronger, more vibrant communities.

5.60 Without this policy the identified accommodation need for Travelling Showpeople will not be met and the aim of providing sufficient good quality housing, which meets the identified needs of different groups in society will not be made available. Therefore the alternative of no policy or 'business as usual' would not be as sustainable as adopting and successfully implementing Policy CS22.

### **Policy CS23 Community Buildings & Cultural Activity**

5.61 In order for developments to contribute to sustainable communities they must be accompanied by a range of infrastructure provision. This provision should contribute to existing community facilities or alternatively add to, extend or enhance existing community facilities to the benefit of the

community, encouraging participation in cultural activity. This policy therefore contributes positively to the following sustainability objectives:

- Improve health (SA objective 1.1)
- Support communities that meet people's needs by promoting stronger more vibrant communities and increasing access to and participation in cultural activities (SA objectives 2.4 and 2.5)
- Provide access to meet people's needs with least damage to communities and the environment by reducing the need/desire to travel longer than walking or cycling distance and help everyone access basic services easily, safely and affordably (SA objectives 4.1 and 4.2)

5.62 The policy sets out the intent to ensure sustainable communities are delivered in line with achieving the high level sustainability objectives. Without implementing Policy CS23 it is likely that the sustainability objectives would not be delivered or considered in a coherent way and a range of community benefits may be missed. Therefore the alternative of no policy or 'business as usual' would not be as sustainable as adopting and successfully implementing Policy CS23.

#### **Policy CS24 Open space standards**

5.63 The policy has been included in the Core Strategy to update the existing Local Policy approach to reflect the need for people to have access to a greater range of open space types in line with national planning policy. It sets out local specific standards of provision to move away from national standards.

5.64 Policy CS24 provides a clear statement on the range of types of open spaces that should be accessible to people. It sets out that employment developments should also contribute to the provision of accessible open space, that the appropriate provision of private outdoor space is delivered, and that the Council's Play Policy is reflected in the Core Strategy. The policy therefore scores highly against Sustainability Appraisal objectives 1, 2, 4 and 5. The policy scores highly against the following sustainability objectives:

- Promotes healthy lifestyles, improves health and reduces health inequalities (SA objectives 1.1, 1.2 and 1.3)
- Promotes stronger more vibrant communities (SA objective 2.4)
- Increases access to cultural attractions (SA objective 2.5)
- Increases choice of method of travel (SA objective 4.1) by providing opportunities non-car routes of travel and ensures provision is accessible to all.
- Makes cycling and walking easier and more attractive (SA objective 4.4)
- Seek to protect and enhances habitats and species (SA objective 5.1)

5.65 Without implementing Policy CS24 it is likely that many of the sustainability objectives would not be appropriately considered and the quality and availability of open space provision would be eroded by increased pressure from usage. Therefore the alternative of no policy or 'business as usual' would not be as sustainable as adopting and successfully implementing Policy CS24.

### **Policy CS25 North Fringe**

5.66 The North Fringe at present experiences high levels of in-commuting as it has considerably less residents than workers as there has been a significant amount of employment growth in recent years. As a result the area experiences a significant amount of traffic congestion and resultant air quality issues. However due to the significant amount of employment in the area, the North Fringe contributes strongly to the area's economic success. The large scale nature of many of the employment activities in the North Fringe has resulted in a development pattern which is somewhat piecemeal and illegible to pedestrians, with most development having been designed to be served primarily by the private car. This enhances the area's traffic problems.

5.67 In seeking to address these issues Policy CS25 has several key aims which all score highly against a number of SA objectives. The policy makes provision for rebalancing land uses through the delivery of a series of new neighbourhoods thereby providing the opportunity for more people to live near to where they work. The policy also makes provision for the continued economic success of the North Fringe, while making provision for enhanced public transport and improved public realm and community facilities to serve the existing residents as well as the new neighbourhoods. Together with planned new improvements to the bus network this may help to reduce in commuting by car. The policy identifies and aims to protect and enhance key landscape, historic and green assets to protect and improve the quality of the environment. Together with ongoing improvements to the walking and cycling links this will contribute to resident's health and well being.

5.68 Overall the policy scores very highly against the following sustainability objectives:

- improving health (SA objectives 1.1, 1.2, 1.3)
- seeking to meet needs locally (SA objectives 3.4, 2.4, 4.3);
- discourage the use of the private car and improve travel choices which will then improve health as well as reducing emissions (SA objectives 1.1, 1.3, 4.1, 4.4, 6.1);
- giving access to and conserving historical and cultural assets (SA objectives 5.3, 5.4, 5.5);
- seeking to preserve the amount, range and success of employment available locally (SA objectives 3.1, 3.4);
- protecting and improving landscape assets (SA objective 5.5)

5.69 Existing policies do not fully recognise the challenges facing the North Fringe of Bristol, particularly in regard to the imbalance between residents and

workers, the need to improve some transport routes, the need to protect key landscape features and improve green infrastructure and formal play provision, and to conserve important historical assets. Without Policy CS25 implementing the strategy for the North Fringe the current sustainability challenges outlined above are likely to be exacerbated.

### **Policy CS26 Cribbs/Patchway New Neighbourhoods**

5.70 This policy will guide development in an area north and south of the Filton Airfield. The north part currently comprises the now ageing Patchway Trading Estate and the Cribbs Causeway retail and commercial areas. The Mall Shopping Centre dominates the retail commercial area. As such, the area is essentially characterised by warehouse type developments surrounded by car parking and served by wide highways. The area is bounded to the north west by the residential area of Patchway and to the west by the new neighbourhood that is expected to be developed over the next 5-10 years of Charlton Hayes. The area to the south of the airfield is currently greenfield land bounded to the south by a freight railway and the northern suburbs of Bristol (Brentry). Given the ageing nature of the commercial areas, the regeneration opportunities available and ability to re-profile the area, an opportunity exists to create a stronger and more diverse community that better integrates with Patchway to the north and Brentry to the south.

5.71 The primary objectives of Policy CS26 are therefore to encourage the regeneration and remodelling of this area in a planned co-ordinated way, while ensuring the operational needs of Filton airfield and aerospace cluster are protected. Land will be used more efficiently to bring new residential and other uses into the area, roads remodelled to form more pedestrian and cycle friendly 'streets', and new local amenities and open spaces introduced to create a vibrant new neighbourhood. In the longer term The Mall shopping centre will perform a new wider 'Town Centre' role. Strong connections will also be made to the surrounding neighbourhoods of Patchway, Brentry and Charlton Hayes in order to assist community capacity building efforts in those areas. Inclusion of land south of the airfield enables these objectives and connections to be made more effectively and increases the critical mass of new housing, thus making new facilities more viable.

5.72 Overall therefore, the policy scores very highly against the following SA objectives:

- Re-use of Brownfield land (sub-objective 5.2).
- The requirement for a comprehensively planned and high quality designed development ensures that the development integrates well into the existing communities, this scores positively against sub-objectives 1.1, 2.3, 2.4, and 3.4.
- The requirement for a range of infrastructure to be delivered ensures the development addresses potential issues, which scores well against sub-objective 6.5.

- Other infrastructure requirements ensures that a comprehensively planned sustainable development is delivered and scores well against the following SA sub-objectives:
  - Education provision, sub-objectives 2.2 and 2.4
  - Local community facilities, sub-objectives 1.1, 2.4, 2.5, 3.4, and 4.3.
  - A range of accommodation types, including pitches for Gypsy and Travellers and an Extra Care housing scheme, sub-objectives 2.1 and 2.4.
  - Adequate provision of open space, sport and recreation facilities sub-objectives 1.1, 1.2, 1.3, 2.4, 4.4, 5.2, and 5.3.
- The provision of a range of housing in accordance with Policies CS17 and CS18 scores very highly against sub-objective 2.1.
- The need for an adequate access network, public transport improvements, safeguarding land for a new rail passenger station, and the delivery of pedestrian and cyclist connections, scores highly against the sub-objectives 1.1, 1.3, 2.4, 4.3, 4.4, 6.1 and 6.5. These measures encourage people to use alternatives to the car to travel to key destinations and ensures that the new neighbourhood integrates well socially and physical with the existing communities.
- Well planned and integrated community open spaces and green infrastructure, including a strategic green corridor for amenity, recreation, sustainable drainage and wildlife use along the Henbury Trym. These requirements therefore score highly against sub-objectives 5.1 5.2, 5.3, and 5.4.

5.73 Existing policies do not fully recognise the challenges facing the North Fringe of Bristol. Policy CS26 will play a major role in the strategy for the North Fringe in terms of assisting to re-balance the housing with employment uses and provide more people with the opportunity to live near to where they work, reducing car use and providing community facilities. Without Policy CS26, implementing the strategy for the North Fringe the current sustainability challenges outlined above are likely to be exacerbated.

### **Policy CS27 – East of Harry Stoke New Neighbourhood**

5.74 Subject to the delivery of the Stoke Gifford Link Road, the Policy makes provision for a major mixed-use development comprising 2000 dwellings and associated infrastructure west of Junction 1 of the M32 and extending east from SGLP site 13 – Harry Stoke. This new neighbourhood will assist in re-balancing an area currently dominated by commercial and educational uses, strengthening the sense of place, delivering high quality open space and contributing to the delivery of new transport infrastructure and connections.

5.75 In the event that the Stoke Gifford Link Road is delivered, this policy scores highly against SA Objective 2: support communities that meet people's needs, in that it will help to make suitable housing available and affordable for

everyone (Objective 2.1); reduce crime and fear of crime through design (Objective 2.3) and promote stronger more vibrant communities through the provision of community facilities, shops and open spaces and the integration with existing communities (Objective 2.4).

5.76 The requirement to provide green infrastructure open space and walking and cycling links will promote healthier lifestyles (Objective 1.3).

5.77 High quality design will deliver development that contributes to positive well being through pleasant surroundings and living conditions and well designed housing (Objective 1.1) and the reduction of non-renewable energy consumption and greenhouse emissions (Objective 6.1)

5.78 The provision of a waste transfer and recycling facility will contribute to Objective 6 - Minimise pollution and consumption of natural resources.

5.79 The M32 Transport Package will assist in providing the opportunity for people to use alternative modes to the car (Objective 4.1) , help everyone access basic services, safely and affordably (objective 4.3) and make public transport cycling and walking easier and more attractive (Objective 4.4). Whilst the Stoke Gifford Transport Link provides a road connection it also provides a public transport link, part of the major Rapid Transit link between the Bristol North Fringe and Hengrove in south Bristol. Together the road connection and public transport link will assist in addressing the issues of congestion and movement in the North Fringe.

5.80 New housing in this location will provide the opportunity for people to be close to a variety of jobs (Objective 3.1).

5.81 The specific requirements for the development set out in the policy have been included to increase the sustainability of and to counter any potential negative sustainability impacts of development in this location. Existing policies do not fully recognise the challenges facing the North Fringe of Bristol. Policy CS27 will play a major role in the strategy for the North Fringe in terms of assisting the re-balancing of housing and employment uses and so providing more people with the opportunity to live near to where they work, reducing car use and providing community facilities. Without Policy CS27, implementing the strategy for the North Fringe, the current sustainability challenges are likely to be exacerbated.

### **Policy CS28 UWE**

5.82 The University of the West of England is a major employer in the Bristol North Fringe and also provides a large amount of leisure, recreational and learning facilities for its students. Because of the large amount of staff and students based at the Frenchay campus the University has in recent years been implementing strategies to reduce its contribution to the Bristol North Fringe's traffic congestion. One of the primary aims of Policy CS28 is to continue this trend by supporting development that will allow for better cycle

and pedestrian access and legibility through the campus, better public transport and the consolidation of separate campuses onto the Frenchay campus. A further primary aim of the policy is to support and encourage the 'opening-up' of a number of the campus's facilities to members of the public in order to better provide for local needs of residents in existing communities as well as future residents in the new neighbourhoods.

5.83 Overall therefore, the policy scores very highly against the following SA objectives:

- Improving health and encouraging exercise (SA objectives 1.1 and 1.3);
- Enhancing community facilities and improving access to them (SA objectives 2.2, 2.4, 2.5)
- Meeting community facility needs locally (SA Objectives 3.4, 4.3)
- Discouraging use of the private car and encouraging walking and cycling (SA Objectives 4.1, 4.4, 6.1)

5.84 Existing policies do not fully recognise the challenges facing the North Fringe of Bristol. Policy CS28 will play a major role in the strategy for the North Fringe in terms of continuing economic and learning success, reducing car use and providing community facilities. Without Policy CS28, implementing the strategy for the Bristol North Fringe the current sustainability challenges outlined above are likely to be exacerbated.

### **Policy CS29 East Fringe**

5.85 The East Fringe at present experiences high levels of out commuting, with twice as many residents as workers. A significant amount of employment land has been lost in recent years. The area is under provided with formal and informal green space and sports pitches. There are areas of relative deprivation and the traditional town centres are experiencing declining fortunes. The area suffers from traffic congestion and resulting air quality issues.

5.86 In seeking to address these issues Policy CS29 has several primary aims which all score highly against a number of SA objectives. The policy will deliver significant new employment at Emersons Green and safeguard employment land throughout the area. Together with planned new improvements to the bus network this may help to reduce out commuting by car. The provision of a better range and amount of local jobs will benefit all residents including those in the priority neighbourhoods. The policy identifies and aims to protect and enhance key landscape, historic and green assets to protect and improve the quality of the environment. Together with ongoing improvements to the walking and cycling links this will contribute to residents' health and well being. The policy aims to improve the vitality and vibrancy of the town centres so that residents have access to local goods and services.

5.87 Overall the policy scores very highly against the following sustainability objectives:

- seeking to meet needs locally in the town centre (SA objectives 3.4, 2.4, 4.3);
- discourage the use of the private car and improve travel choices (SA objectives 4.1, 4.4);
- giving access to and conserving historical and cultural assets (SA objectives 2.5, 5.3, 5.5);
- seeking to increase the amount and range of employment available locally (SA objectives 3.1, 3.4);
- Protecting and improving landscape assets (SA objective 5.5)

5.88 Existing policies do not fully recognise the challenges facing the East Fringe of Bristol, particularly in regard to the loss of employment land to other uses, the need to improve some transport routes, the need to protect key landscape features and improve green infrastructure and formal play provision, and to conserve important historical assets. Without Policy CS29 implementing the strategy for the East Fringe the current sustainability challenges outlined above would be likely to be exacerbated.

### **Policy CS30 Yate & Chipping Sodbury**

5.89 Policy CS30 has several primary aims which all score highly against a number of SA objectives. Yate and Chipping Sodbury at present experiences a large amount of both in and out commuting for employment. One of the primary aims of the policy therefore is to increase the self containment of the towns by diversifying the range of jobs available within any regeneration opportunities (the policy makes specific reference to Stover Road Industrial Estate/North Road area and the Broad Lane Depot Site), and through the new provision in the new neighbourhood and ensuring that home working opportunities are facilitated through the provision of the necessary connections and technology. The aim is to help to re-profile the employment base and improve self-containment. The policy also seeks to ensure that Yate and Chipping Sodbury's public transport services are more attractive and accessible to users, and that enhanced cycling and walking connections are delivered, in order to provide alternatives to the private car.

5.90 The policy recognises that Yate's evening economy needs to be significantly improved to support the existing and future population, in order for the town to become more active, vibrant and self-contained. Chipping Sodbury's architectural heritage will be preserved and enhanced to encourage and develop its role as a tourist destination and emphasise its niche retail opportunities. To enhance the vibrancy of Chipping Sodbury a new food store will be accommodated. The architectural character and landscape settings of both the towns needs to be reinforced, whilst the special character and appearance of Chipping Sodbury's Conservation Area and Yate's heritage will be preserved and enhanced. The two towns will continue to complement one another and therefore contribute to a more sustainable community as a whole;

in particular the policy recognises the need for enhanced cultural opportunities.

5.91 The policy seeks to address deficiencies in community and cultural facilities in order to improve health and well-being, enhance people's sense of belonging and identity, and enable the towns to become a more attractive service centres for the surrounding rural communities. The policy also addresses waste and flood risk issues appropriately.

5.92 Overall the policy scores very highly against the sustainability objectives, in terms of:

- seeking to diversify the range of jobs available locally, to increase self-containment (SA objectives 3.1 and 3.4);
- encourage the use of the non car travel (SA objectives 4.1 and 4.4);
- conserving and enhancing open spaces (green infrastructure), historical and cultural assets (SA objectives 1.3, 2.5, 5.3 and 5.5);
- seeking to address skill and learning issues (SA objective 2.2);
- seeking to meet needs locally in the town centres (SA objectives 2.4, 2.5, 3.4 and 4.3);
- protecting habitat and species, and safeguarding opportunities to access nature (SA objectives 5.1, 5.2 and 5.3)
- protecting and enhancing landscape and townscape, and maintaining and enhancing cultural and historical assets (SA objective 5.3 and 5.5)

5.93 Existing Local Plan policies do not fully address the opportunities that Yate and Chipping Sodbury have to build upon their distinct yet complementary sustainable communities in an overarching policy. Without implementing Policy CS30 it is likely that many of the sustainability objectives would not be met for Yate and Chipping Sodbury in the period to 2026 and the underlying sustainability issues and challenges currently facing the towns would continue and likely worsen. Therefore the alternative of no policy would not be as sustainable as adopting and successfully implementing Policy CS30.

### **Policy CS31 North Yate New Neighbourhood**

5.94 Policy CS31 sets out the specific requirements for the new neighbourhood at North Brimsham, Yate. This area will accommodate a major mixed-use development comprising up to 3,000 dwellings, employment opportunities and associated infrastructure. The policy scores well against the SA objectives.

5.95 The specific requirements for the new neighbourhood set out in the policy have been included to deliver a sustainable development and counter any potential sustainability impacts that inappropriate development may cause.

- The requirement for a comprehensively planned and high quality designed development ensures that the development integrates well into the existing community scores positively against sub-objectives 1.1, 2.3, 2.4, and 3.4.
- The requirement for a range of infrastructure to be delivered ensures the development addresses potential issues, in particular the need for adequate sewerage infrastructure, scores well against sub-objective 6.5.
- Other infrastructure requirements ensures that a comprehensively planned sustainable development is delivered and scores well against the following SA sub-objectives:
  - Education provision, sub-objectives 2.2 and 2.4
  - The multi-use centre, sub-objectives 1.1, 2.4, 2.5, 3.4, and 4.3.
  - A range of accommodation types, including pitches for Gypsy and Travellers and an Extra Care housing scheme, sub-objectives 2.1 and 2.4.
  - Adequate provision of open space, sport and recreation provision sub-objectives 1.1, 1.2, 1.3, 2.4, 4.4, 5.2, and 5.3.
  - The enhancement of sport and recreation provision, sub-objectives 1.1, 1.2, and 1.3.
  - Appropriate provision of waste and recycling facilities, sub-objective 6.4.
  - Appropriate communication technology to support home working, sub-objectives 3.1 and 3.4.
  - Cultural provision, sub-objectives 1.1 and 2.5.
- The provision of a range of housing in accordance with Policies CS17 and CS18 scores very highly against sub-objective 2.1.
- The requirement for employment land and home working opportunities scores well against sub-objectives 3.1, 3.2, 3.3 and 3.5.
- The need for an adequate access network, including a through road, public transport improvements, and the delivery of pedestrian and cyclist connections, scores highly against the sub-objectives 1.1, 1.3, 2.4, 4.3, 4.4, 6.1 and 6.5. These measures encourage people to use alternatives to the car to travel to key destinations and ensures that the new neighbourhood will integrate well socially and physical with the existing community.
- The protection and enhancement of green infrastructure retains the valued landscape near to the new neighbourhood, encourages access to and use of nearby assets, and protects the community of Yate Rocks, these requirement therefore scores highly against sub-objectives 5.1 5.2, 5.3, and 5.4.

5.96 The specific requirements for the development set out in the policy have been included to increase the sustainability of and to counter any potential negative sustainability impacts of development in this location and across the community. The policy has been developed through a comprehensive consultation process and addresses the issues highlighted; existing policies within the Local Plan do not appropriately address these specific issues. The inclusion of Policy CS31 assists with fulfilling elements of

the Vision, Policy CS30 and Partnership Priorities for Yate and Chipping Sodbury area. Inclusion of Policy CS31 ensures that a number of SA Objectives are addressed and that sustainable development will take place.

### **Policy CS32 Thornbury**

5.97 Policy CS32 has several primary aims which all score highly against a number of SA objectives. Thornbury at present experiences a large amount of both in and out commuting for employment. One of the aims of the policy therefore is to increase the self-containment of the town by ensuring the widest choice of employment possible is available in the town's existing premises. This may help to reduce the amount of out-commuting currently conducted by residents looking for higher paid office-based jobs. The policy also seeks to ensure that the town's bus services are as accessible as possible to the public to ensure the discouragement of the use of the private car.

5.98 The policy recognises that Thornbury benefits from an important historical character and surrounding landscape setting. It seeks to utilise these assets to increase tourism to the town to increase town centre vibrancy and trade and as such it is recognised that these assets need to be conserved. Thornbury's aging population profile and associated healthcare requirements are also recognised in the policy.

5.99 Overall the policy scores very highly against the following sustainability objectives:

- seeking to meet needs locally in the town centre (SA objectives 3.4, 2.4, 4.3);
- discourage the use of the private car (SA objectives 4.1, 4.4);
- giving access to and conserving historical and cultural assets (SA objectives 2.5, 5.3, 5.5);
- supporting the retention of excellent schooling (SA objectives 2.2);
- seeking to increase the range of employment available locally (SA objectives 3.1, 3.4);
- supporting healthcare improvements and care for the elderly (SA objective 1.2)

5.100 Existing Local Plan policies do not fully recognise the challenges facing Thornbury, nor do they look forward to plan proactively for Thornbury's future. Without implementing Policy CS32 it is likely that many of sustainability objectives would not be met for Thornbury in the period to 2026 and the underlying sustainability problems and challenges currently facing the town would continue and likely worsen. Therefore the alternative of no policy or 'business as usual' would not be as sustainable as adopting and successfully implementing Policy CS32.

### **Policy CS33 Thornbury Housing Opportunity**

5.101 Policy CS33 sets out the specific requirements for any housing development to occur north of Thornbury. The location for provision of 500 dwellings made in this policy scores very highly against various SA sub-objectives, as set out in Section 4. The specific requirements for development set out in the policy have been included to increase the sustainability of the development and to counter any potential negative sustainability impacts of development in that location, as follows:

- The requirement for a Historical Environment Character Assessment will ensure that development will not negatively impact on the historic and cultural significance of the Conservation Area and Grade 1 listed building (Thornbury Castle). This requirement therefore scores very highly against SA sub-objectives 2.5, 5.3, 5.4 and 5.5.
- The requirement for further technical work to demonstrate that any development would not negatively impact on flood risk score very highly against sub-objective 5.6.
- The provision of a new sixth form centre will ensure that the town's excellent educational achievement is continued and remains available for all. This therefore scores very positively against sub-objectives 2.2 and 2.4.
- The provision of adequate community and Green Infrastructure is required for the creating stronger and more vibrant communities and encouraging exercise. This therefore scores highly against sub-objectives 1.1, 1.3, 2.4 and 2.5.
- Ensuring that transport infrastructure associated with development is required to ensure that highway safety and residential amenity is not compromised, especially along Park Road and Castle Street. It is also vital that the policy discourages car use as far as possible and encourages public transport, walking and cycling (especially to and from the town centre). The transport requirements therefore score very highly against sub-objectives 1.1, 1.3, 2.4, 4.3, 4.4 and 6.5.
- The provision of a range of housing in accordance with Policies CS17 and CS18 score very highly against sub-objective 2.1.

5.102 If the requirements of the policy are not fully implemented then it is likely that any development would have a number of negative sustainability impacts on Thornbury. The inclusion of Policy CS33's requirements score highly against a number of SA objectives and therefore is a substantially more sustainable and preferred approach to not including the policy's requirements.

### **Policy CS34 Rural areas**

5.103 The rural areas of South Gloucestershire are very diverse and contain many highly valued, distinctive and attractive landscapes and areas of ecological importance. There are over 30 villages in the rural areas of South Gloucestershire. These range from small hamlets to settlements with several thousand people. The physical characteristics of the villages also vary greatly. Green Belt covers a significant proportion of the district.

Development pressures are experienced on the edge of the urban area and within villages. Lack of affordable housing is regarded as a significant problem. The decline in local services and facilities combined with poor public transport leads to significant commuting trips for shopping, employment and education.

5.104 The aim of the policy is to set out an integrated approach to balancing the conservation and enhancement of the countryside and rural settlements with sustaining and promoting thriving local rural communities and the rural economy. The policy also indicates the Council's intention to review the approach to the distribution of development in the rural areas in the future and the Council's wish to see the rural areas make a positive contribution to the generation of renewable energy and healthier lifestyles.

5.105 This policy therefore contributes positively to a significant number of sustainability objectives:

- SA objective 1: Improve health:
  - providing affordable housing in locations where there is an identified need and a local connection, thereby encouraging social networking and reducing stress caused by being in housing need.
  - promoting healthier lifestyles by providing walking and cycling links to and from the rural areas.
- SA Objective 2: Support communities that meet people's needs:
  - providing suitable housing and affordable housing in locations where there is identified need;
  - promoting stronger, more vibrant rural communities
- SA Objective 3: Develop the economy in ways that meet people's needs:
  - giving everyone access to satisfying work opportunities – protecting rural employment sites, services and facilities, supporting farm diversification, supporting the provision of communication technologies to aid working from home and rural enterprises.
  - helping everyone afford a comfortable standard of living – provision of affordable housing.
  - reducing poverty and income inequality – rural transport package to aid accessibility and improve public transport.
  - meeting needs locally – encouragement of farm diversification local food production and protection of local services.
- SA Objective 4: Provide access to meet people's needs with least damage to communities and the environment:
  - reducing the need to travel longer distances but ensure that where longer distance travel is necessary that the form chosen has minimal environmental impact.
  - helping everyone access basic services easily, safely and affordably.
  - making public transport, cycling and walking more attractive.

- SA Objective 5: Maintain and improve environmental quality and assets
  - protecting and enhancing habitats and species
  - promoting the conservation and wise use of land
  - protecting and enhance landscape and townscape
  - valuing and protect diversity and local diversity and local distinctiveness including rural ways of life
  - maintaining and enhancing cultural and historical assets
  - reducing vulnerability to flooding and sea level rise.
- SA Objective 6: Minimise pollution and consumption of natural resources:
  - reducing non-renewable energy consumption and greenhouse emissions

5.106 Policy CS34 is largely composed of the rural elements from other Core Strategy policies, other LDF saved policies and guidance which relates to rural issues. Therefore without this policy the strategy for the rural areas could still be implemented and the sustainability objectives outline above would still be delivered. However the policy is beneficial in that it sets out in a comprehensive manner the approach to the rural areas in one location in the Core Strategy. In addition the policy complements the other spatial area policies thereby providing comprehensive coverage of the whole of South Gloucestershire.

### **Policy CS35 Severnside**

5.107 The policy for Severnside is set out in a different way to other more conventional policies due to the circumstances of the existence of an extant planning consent for major employment development dating from 1957/58. The policy therefore seeks to encourage joint working and cooperation between the Council and the landowners to overcome the major constraints in and around the site.

5.108 It is likely that without the successful implementation of mitigation strategies outlined in the supporting text to the policy then the implementation of the extant consents would have severe negative implications for the sustainability of the Severnside site and surrounding area, in terms of:

- the impact on biodiversity and natural habitat, and the associated national and international designations;
- the impact on both local highways network and strategic road infrastructure;
- the impact on and permanent loss of potential archaeology; and
- flood risk, which will worsen as climate change increases throughout the plan period and beyond.

5.109 It is therefore vital that if the extant permissions at Severnside are to be delivered sustainably then these constraints must be overcome, and mitigated wherever necessary. Policy CS35 scores well against SA objective 3.1 (give everyone access to satisfying work opportunities), but if these constraints are

not overcome in a sustainable fashion then further development progressing would result in low or very low scores for other sustainability objectives associated with biodiversity, flooding and responding to climate change.