

South Gloucestershire Local Plan: **Core Strategy 2006 - 2027** **Inspector's Draft Main Modifications**



Sustainability Appraisal Report

October 2012

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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).

Together with the Scoping Report (March 2008), the Initial SA Report (June 2008), and the SA Reports that accompanied the previous iterations of the Core Strategy, this report (the October 2012 SA Report regarding the Inspector's Draft Main Modifications to the South Gloucestershire Core Strategy) constitutes the SA Report (or Environmental Report under European Strategic Environmental Assessment regulations) for South Gloucestershire's Core Strategy and is being published to accompany the Inspector's Draft Main Modifications.

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 2027. 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 process 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

This SA Report is split into three broad parts:

1. Chapters 1 and 2 introduce the Core Strategy and the SA process and explain what sustainable development means in practice.
2. Chapters 3 and 4 explain how the Council has appraised the Inspector's Draft Modifications and what the main findings of the appraisal are.
3. Chapter 5 sets out information on the Habitats Regulations Assessment required under European Law.

Appraisal of the Draft Main Modifications

Many of the draft Main Modifications proposed by the Inspector have been considered to not have any significant effects on sustainability objectives, due to their minor or process based nature. Where the modifications are considered to have potentially significant effects, many are considered to either be neutral or positive.

However the appraisal process has found that there are potential negative effects arising from the changes proposed to Policies CS5 and CS15 of the Core Strategy. In summary, while those changes do not increase the overall housing requirement to that proposed by the Council during the Examination in Public, they do bring forward a proportion of the housing supply to earlier in the plan's period and allow for potential

further sites to be identified for development either in later Development Plans or in an 'Interim Housing Statement'.

The appraisal has found that the negatives effects of this are mainly linked with the modifications allowing for potential for new housing development sites to be brought forward in open countryside and/or Green Belt locations, in locations which have already been considered and dismissed through the Core Strategy's production. While it is recognised that the Inspector is not advocating a dispersed development strategy and/or the need to bring forward housing sites in the countryside/Green Belt locations, a possible consequence of the changes made to the Core Strategy, that reflect current Government policy to provide more flexibility in housing land supply, could result in instances where this may arise which could negatively impact on sustainability objectives.

The weakness of demand in the housing market and underlying economic conditions are also identified as a potential reason to question the actual need for this additional housing development.

The SA also identifies potential positive and negative consequences regarding modifications to Policy CS14 concerning The Mall. The policy supports town centre vitality and viability and the modification places greater emphasis on this through the removal of a significant amount of floorspace growth at Cribbs Causeway. While the modification appears to help support vitality and viability of existing centres in South Gloucestershire, helping to meet needs locally, given the limited capacity of existing centres to accommodate this level of growth, there is a likelihood of pressure for it coming forward in out of centre locations.

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. Many of the Draft Main modifications proposed by the Inspector have either positive or neutral effects on sustainability. However potentially negative effects have been identified relating to the bringing forward of housing supply to earlier in the plan's period and the overall increase in the housing requirement.

1. Introduction

1.1 South Gloucestershire Council is preparing a Local Plan for the District. The key documents that comprise the Council's Local Plan are the Core Strategy Development Plan Document (DPD), the Joint Waste DPD (adopted March 2011; was produced jointly with Bristol City, Bath and North East Somerset and North Somerset Councils) and the forthcoming Policies, Sites & Places DPD.

1.2 Sustainability Appraisal (SA) was introduced to ensure that specific plans and policies (including those of the Local Plan) are prepared to accord with the principles of sustainable development as set out at paragraph 7 of the National Planning Policy Framework. SAs incorporate the requirement of European Directive 2001/42/EC, to undergo a process known as Strategic Environmental Assessment (SEA).

1.3 The purpose of SEA is to identify, describe and evaluate the likely significant effects on the environment of implementing the plan and reasonable alternatives to it taking account of the objectives and geographical scope of the plan. This requires consideration of the various environmental factors such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape, in order to determine the likely significant effects on the environment of the Council's policies and proposals and reasonable alternatives to them. By considering these matters in detail, SEA ensures that environmental effects are fully taken into account in the preparation and adoption of the Council's plan.

1.4 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 Council's Local Plan.

2. Progress of the South Gloucestershire Core Strategy and the purpose of this SA Report

2.1 Following the South Gloucestershire Core Strategy Examination hearing sessions held in June and July 2012, the Council received the Inspector's preliminary findings and published these on the Council's website on 14th September.

2.2 The Inspector has concluded that the Submission Core Strategy March 2011 incorporating the December 2011 Core Strategy (approved by Full Council on 14th December 2011) is unsound, but provided a number of modifications are made the Plan is capable of being found sound. As a result he has made a number of draft main modifications that must be subject to Sustainability Appraisal and public consultation before the Inspector can issue his final report and main modifications.

2.3 The extent of the main modifications required are set out in eight supporting appendices supported by a covering letter and are available on the Council's website at www.southglos.gov.uk/corestrategy.

2.4 As Core Strategies are required to undergo Sustainability Appraisal (SA), the Inspector's draft main modifications must be subject to SA. The Council has prepared this SA Report which is being issued for public consultation alongside the draft main modifications. Representations received will be passed to the Inspector for him to take into account when drafting his final recommendations.

2.5 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.

2.6 In meeting the requirements of the Environmental Report (herein referred to as the SA Report) as required by the Environmental Assessment of Plans and Programmes Regulations 2004 and the Strategic Environmental Directive 2001/42/EC, the Council has produced the following documents during the production of the Core Strategy:

- Local Development Framework Scoping Report 2008;
- Initial SA Report 2008 – to accompany the Core Strategy Issues & Options document;
- Draft SA Report of the Pre-Submission Publication Draft Core Strategy March 2010;
- SA Report to support the Submission Core Strategy, March 2010 with December 2010 updates;
- Supplementary Sustainability Appraisal Report regarding Filton Airfield June 2011; and
- December 2011 SA Report to Support the December 2011 Core Strategy incorporating Post-Submission Changes.
- October 2012 Sustainability Appraisal Report regarding the Inspector's Preliminary Findings and Main Modifications.

2.7 These documents are available on the Council's website at www.southglos.gov.uk/corestrategy and they set out the requirements for Sustainability

Appraisal and demonstrate how the Core Strategy has been informed by SA objectives throughout its production.

2.8 The SA process has, at each stage of the preparation of the Core Strategy, been subject to public consultation in accordance with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Strategic Environmental Assessment Directive. Consultation responses have formed part of the iterative process of preparing the SA.

2.9 The SA report provides information that is to be taken into account when making decisions about preferred options. It is required to inform the decisions, but in itself it does not prescribe the contents of the final plan. The Council has updated the SA Report documents at each stage of the Core Strategy's production in order to ensure that changes made at each stage have been properly appraised. This included the December 2011 version of the Core Strategy.

3. Appraisal Methodology

3.1 This SA Report appraises each of the draft Main Modifications that have been made to policies contained in the Core Strategy that are considered to potentially result in significant effects on sustainability objectives. Given the strategic nature of the Core Strategy the appraisal work is inevitably 'broad brush'.

3.2 The matrices in Appendix 1 appraise the proposed modifications against the SA Objectives. These objectives were approved by the Council in 2008 as part of the LDF Scoping Report which is available on the Council's website at www.southglos.gov.uk/corestrategy

3.3 The Strategic Environmental Assessment Directive requires that plans and programmes are assessed against reasonable alternatives. In this instance the reasonable alternatives are considered to be the option of not implementing the proposed modification.

3.4 A number of policies are subject to main modifications, however due to the minor or process based nature of them no issues are considered to be raised which would significantly impact upon the SA objectives. Those policies are listed as follows:

Policy CS2	Changes are minor and for clarification purposes to aid the interpretation of the strategic GI network. The points deleted are already covered elsewhere in the policy and the new text does not impact on sustainability objectives.
Policy CS12	Changes are for clarification only. They do not alter the principles of the policy and they do not impact on sustainability objectives.
Policy CS22	Changes are only of a minor change to bring the policy up to date and are not considered to impact on sustainability objectives.
Policy CS25	Changes are for clarification only. They do not alter the principles of the policy and they do not impact on sustainability objectives.
Policy CS30	The changes provide a cross reference to the wording in Policy CS14 and therefore are not considered to impact on sustainability objectives.
Policy CS33	The removal of the requirement for a Supplementary Planning Document (SPD) to accord with the Council's revised Local Development Scheme will not have significant effects on sustainability objectives and given that it is a matter of process it is not applicable to SA Objectives. The vision for Thornbury, in combination with Policies CS32 and CS33, and the Core Strategy's overall policy framework, provides a framework in which new development can be brought forward

	<p>in a sustainable manner through the development management process.</p> <p>The clarification that development at Park Farm will comprise <i>up to</i> 500 dwellings, rather than <i>approximately</i> 500, will not have significant effects on sustainability objectives. The change is proposed in order to clarify the quantum that is deliverable on the site, taking into account the requirements of Policy CS33.</p>
Policy CS34	<p>Modifications clarify the approach to reviewing settlement boundaries. As this area of the modifications is process based, and as it does not significantly alter the previous policy position it is not considered that it will impact on sustainability and is therefore not relevant to the SA Objectives.</p>
Policy CS36	<p>A significant number of changes are proposed to Chapter 18 of the Core Strategy. The majority of these changes, which have been taken forward from a Statement of Common Ground between the Council and Horizon Nuclear Power (see Examination Library ref: SS26), are presentational and process based and therefore do not have significant impacts on sustainability objectives. Changes to Policy CS36 and supporting text are minor and for clarification purposes only and/or to bring the policy up to date. They do not alter the principles of the policy and they do not impact on sustainability objectives.</p>

3.5 Main Modifications have also been made that clarify the extension of the plan period to 2027 and to clarify how this relates to the delivery of the North Yate New Neighbourhood (MM1). This is not considered to have significant impacts on sustainability objectives. In addition to this, a new Core Strategy objective related to ensuring the implementation of the plan has also been added as a main modification (MM2). The policy expression of this objective is contained in new Policy CS4A and the modification to CS6, recognising that the plan should be read as a whole, which has been subject to appraisal in Appendix 1.

3.6 A number of 'additional modifications' are also being proposed by the Council, together with an errata list. These modifications are separate from the main modifications proposed by the Inspector and are all of a minor and/or factual nature. Given their minor nature they are not required to undergo appraisal as none are considered to have a significant effect on SA objectives.

3.7 Policies which have had no main modification proposed to them have not been subject to SA as part of this October 2012 report, given that they were appraised during previous stages of the Core Strategy's production, the most recent of which was the December 2011 SA Report that supported the December 2011 Core Strategy incorporating Post-Submission Changes.

4. Findings of Appraisal

4.1 Overall the Inspector has not proposed significant modifications to the majority of the Core Strategy's policy framework, the strategic housing requirement, Green Belt, location and distribution of development. New development sites are not proposed by the Inspector and neither has he recommended deleting or altering the scale of any of the New Neighbourhoods or the Thornbury Housing Opportunity Area. Therefore the majority of SA work previously undertaken during 2010 and 2011 on the Core Strategy in relation to the location of development still stands and none has been re-appraised in this report.

4.2 During the Examination hearings held in June and July 2012, the Council proposed a number of suggested changes to the Core Strategy (see Schedule of Rolling Changes; Examination Library ref: SRC3). The majority of these changes have been taken on board by the Inspector and confirmed as his Main Modifications and it is these modifications which are now the subject of this SA. The appraisal matrices in Appendix 1 set out the appraisals of the modifications to each policy (where required). The level of commentary and information included for each policy in Appendix 1 is broadly determined by the significance and volume of the main modifications made to each. The main areas of modification proposed by the Inspector and their summarised sustainability implications are as follows:

4.3 **Overall housing requirement** – the Inspector has recommended that the housing quantum up to 2027 should be a minimum of 28,355 – the inspector has therefore accepted the council's position that Core Strategy makes provision for 26,855 dwellings with the addition of 1500 dwellings from small site (1-9) windfall sources during the first 10 years of the plan.

4.4 **Sustainability implications:** The uplift of the housing quantum in the Inspector's draft main modifications from that identified in the December 2011 Core Strategy incorporating Post-Submission Changes to 28,355 represents a material change in circumstance which must be assessed against reasonable alternatives.

4.5 Reasonable alternative development sites were assessed in the Initial SA Report that accompanied the 2008 Issues & Options document and in the SA Report that accompanied the March 2010 Draft Core Strategy (and subsequent December 2010 Core Strategy). Those reasonable alternatives were then reconsidered afresh against SA Objectives by the Council in preparing the December 2011 Core Strategy incorporating Post-Submission Changes, as alternative options for meeting the uplift in the housing target then identified at that stage.

4.6 The uplift in the overall housing quantum increases the potential amount of development to be delivered in South Gloucestershire, potentially positively impacting on some SA objectives by providing development to support local communities. However it is not possible to appraise the effects with any certainty as the location, nature and quantum of future potential windfall developments are not known. In any case, windfall sites are specified to comprise sites of between 1 and 9 dwellings only, and would be likely to come forward in urban areas more than rural ones, and anyway would need to be consistent with development management policies and the NPPF. Therefore any impacts on SA objectives are considered on balance to not be significant.

4.7 5 year land supply and NPPF 20% buffer – the Council’s proposed approach to delivering housing growth had been to use a phasing approach over three 5 year periods, (each 5 year period representing what the council considers to be a sustainable level of housing). Instead the Inspector has proposed an annualised approach set at 7788/1558 pa. The Inspector has also indicated a 20% ‘bring forward supply’ is added to the first five year period (7788 dwellings) of the Core Strategy to comply with paragraph 47 of the National Planning Policy Framework – to give a total of 9,345. To do this he suggests sites need to be identified to be brought forward from the second phasing period or new sites found capable of meeting the shortfall. To do this he has suggested the production of an Interim Housing Statement.

4.8 Sustainability implications: The impacts on sustainability objectives of the introduction of the 20% buffer, based on the options set out in paragraph 10.6a and Policy CS5 as proposed to be modified by the Inspector, have been assessed as follows:

- 1) Impact of bringing forward sites identified in the Core Strategy earlier, therefore phasing some development earlier.** This is not considered to negatively impact on SA objectives as the sites identified in the Core Strategy have been subject to Sustainability Appraisal and have been found to be the most sustainable and appropriate options for development;
- 2) Impact of reviewing capacity on sites proposed in the Core Strategy process in order to increase the number of deliverable dwellings.** This is not considered to impact negatively on sustainability objectives as long as changes to capacity, such as by increasing densities in some locations, adhere to the Local Plan’s policy framework and the NPPF which encourage sustainable, viable and deliverable development; and/or
- 3) Impact of identifying additional sites.** This may be done by:
 - a. bringing forward sites through the Development Management process.** Where sites are brought forward in a manner consistent with Development Management policies and the NPPF, the sustainability impacts are likely to be limited/neutral. However a possible weakness of this approach is where decisions are made through the appeal process, thereby possibly giving less weight to the plan-led system. While it is recognised that the Inspector is not advocating a dispersed development strategy and/or the need to bring forward housing sites in the countryside/Green Belt locations, a possible consequence of the changes made to CS15, that reflect current Government policy to provide more flexibility in housing land supply, could result in instances where this may arise. Any sites, other than those already considered and dismissed through the Core Strategy process, that come forward through this route will not have been identified in the Council’s Local Plan and therefore would not have been subject to Sustainability Appraisal. Because it is not known where these possible sites might be located it is not possible to appraise them. However it is considered likely that they would either be omission sites already promoted and rejected through the Core Strategy process, or other rural sites not compliant with the Local Plan and the NPPF; or

- b. the production of an Interim Housing Statement which may identify one or more omission sites that were promoted through the Core Strategy's production** (e.g. but not exhaustively - Engine Common, Morton Way (Thornbury), Woodlands Farm (Frampton Cotterell) or East of Chipping Sodbury). The distribution of development in the Core Strategy has been subject to Sustainability Appraisal which resulted in the dismissal of a spatial strategy that sought to disperse growth to Green Belt and rural locations beyond the communities of the Bristol North and East Fringes and the market towns of Yate/chipping Sodbury and Thornbury. Although a strategy of bringing forward more development in rural areas might solve a shortfall and therefore contribute to construction rates in the district, the Inspector has not advocated this pattern of development. Instead, Policy CS5 as amended by the Inspector sets out the process by which the justification for how the release of land for non-strategic development for residential and other forms of development, for Green Belt and non-Green Belt locations, may come forward. Notwithstanding these issues, and recognising the due process needed to be undertaken for future DPDs or Neighbourhood Plans, the introduction of any alternative sites outside of Core Strategy processes undertaken to date, or any other DPD process, through a non-statutory document such as an Interim Housing Statement as indicated under the Inspector's new paragraph 10.6a, is also considered to be potentially contrary to the objectives of Strategic Environment Assessment and Sustainability Appraisal. Negative sustainability impacts have therefore been identified in relation to the changes made to Policy CS15.

4.9 In addition to these matters, the bringing forward of supply to earlier in the plan's period may have negative impacts on the plan's objective to secure sustainable construction standards. Given that a greater level of development could occur prior to the introduction of more sustainable Building Regulations a consequence of this would be to allow large parts of the Core Strategy's strategic growth allocations to be built out against current (lower) Building Regulations prior to zero carbon regulations coming into effect. Moreover, the bringing forward of supply would need to be matched by the bringing forward of required infrastructure so as not to result in unsustainable development.

4.10 Any introduction of new development sites through an Interim Housing Statement that would lead to residential development in open countryside in demonstrably unsustainable locations would negatively impact on local communities and SA objectives. Moreover, should any sites that come forward through this process be demonstrated to be contrary to Green Belt purposes, this would lead to negative sustainability impacts. As the Interim Housing Statement does not have the status of a development plan or neighbourhood plan and is not subject to due process, the final arbitrator in the event of sites coming forward that are not in conformity with Council's Local Plan would be the development management appeal process.

4.11 The Inspector's increase in the housing requirement of 1500 dwellings, based on an allowance for small (1-9 dwellings) on windfall sites to a new total for the period of 28,355 may not appear significant, but if development is allowed to come forward via a potential planning by appeal process as outlined in para 4.8 (item 3, a) above, then this could have implications for the Green Belt, the wider countryside and thus sustainability

objectives. Furthermore, given the current economic and financial circumstances, demand for new homes is likely to remain weak. This raises questions over whether the development sector will actually be able to achieve the construction rates now set out in Policy CS15.

4.12 However, the impact of small windfall sites on sustainability principles should be relatively minor. Firstly, it is possible that most windfall sites coming forward would be in urban areas. Secondly, those possibly coming forward in rural/Green Belt areas will still need to adhere to sound planning principles. If they do not then the expectation should be for them to be refused. Where a larger grouping of units might come forward, these should be delivered through Policies Sites & Places DPD or Neighbourhood Plans where the local community has decided it wants to support some limited development and has reached broad agreement with the Council on this. Sustainability issues would then be taken on board as part of the Sustainability Appraisal process of that DPD and/or Neighbourhood Plan.

4.13 **Non strategic development** – In summary, the Inspector recommends modifications to Policy CS5 to facilitate development for housing and other land uses in non strategic sites of up to 30 dwellings both in Green Belt and rural area locations, with this to be delivered through the Policies, Sites and Places DPD and/or neighbourhood plans.

4.14 **Sustainability implications:** Any sites that came forward through this process would need to be consistent with the NPPF Green Belt policy. This in order to be satisfied that any development would not be harmful to the countryside or Green Belt purposes. Although the Inspector is not advocating this pattern of development, a potential consequence of further non-strategic development, whether individually or cumulatively, would be a further loss of Green Belt and open countryside. This situation could be made worse in instances where the Green Belt and/or open countryside buffer between settlements is particularly narrow and already under some pressure. These negative sustainability effects are considered to outweigh whatever economic benefits may arise from providing more flexibility in housing land supply.

4.15 Development in the countryside can also impact on healthy lifestyles through potential negative impacts on access and public rights of way. Negative SA impacts have therefore been identified in relation to the changes to CS5.

4.16 **Expansion of the Mall by 35,000 sqm** – In the December 2011 Core Strategy Policy CS14 identifies a requirement for 34,000 sqm of new comparison floorspace in South Gloucestershire by 2026 to meet the needs of residents. 18,000 sqm of this was identified to come forward at the Mall/Cribbs Causeway. In addition, 17,000 sqm of new comparison floorspace was identified to come forward at the Mall/Cribbs Causeway to meet wider sub-regional needs. This therefore gave a new floorspace provision figure of 35,000 sqm to the Mall/Cribbs Causeway.

4.17 The Inspector is not against the principle of further growth at The Mall, however he considers that the council's proposals for expansion of Mall/ Cribbs are premature, that the basis for expanding a major shopping centre has not been sufficiently justified and is concerned about the affect this substantial growth would have on other centres in the

region. He considers that the implications of growth need to be further explored with other operators and Unitary Authorities and has indicated that the vehicle to do this is through the Policies, Sites & Places DPD where the Duty to Cooperate would need to be complied with. Notwithstanding this, the Inspector supports the provision of 34,000 sqm of new comparison floorspace within the district by 2026 to meet the needs of South Gloucestershire residents. The Inspector's modifications therefore delete the 35,000 sqm at The Mall/Cribbs Causeway and the indicative distribution shown in Table 3a. As a consequence, the provision of 34,000 sqm of new comparison floorspace is now proposed only to be distributed between the town and district centres in South Gloucestershire.

4.18 Sustainability implications: This is considered to have positive impacts on sustainability objectives overall by placing greater emphasis on meeting the need for further comparison retail development in existing centres in South Gloucestershire. However, the Town Centre & Retail Study that forms part of the Core Strategy's evidence base, recognised that there is neither the physical nor market capacity in the existing town centres in South Gloucestershire to accommodate the level of floorspace growth required to meet the needs of residents and consequently recommended that a substantial proportion of this floorspace should be accommodated at Cribbs Causeway.

4.19 While the modification appears to support vitality and viability of existing centres in South Gloucestershire, helping to meet needs locally, given the limited capacity of existing centres to accommodate this level of growth, there is a strong likelihood of pressure for it coming forward in out of centre locations. This would potentially have an undesirable impact on sustainability objectives. For this reason, and connected to the Council's transformational objectives for Cribbs/Patchway, table 3a was previously included in the Core Strategy which has been deleted by the Inspector. Consequently this weakens the ability of the Council to provide the certainty needed to support retail growth in the district, given the other changes made to Policy CS14 as detailed above and the devolution of this function to the Policies, Sites & Places DPD.

4.20 This would therefore have the direct opposite of the intended effect. In addition, there are negative impacts in terms of job and wealth creation as a lower level of development is now proposed as there is no longer any floorspace provision to meet wider sub-regional needs.

4.21 New Neighbourhood policies – modifications are proposed to the New Neighbourhood Policies CS26, CS27 and CS31 which aim to ensure that development is delivered in a coordinated manner. Changes have also been made to the requirements for Gypsy/Traveller pitches to be delivered in the new neighbourhoods; whereby the potential for their delivery in the New Neighbourhoods must be considered rather than required. In addition, the clause in Policy CS27 relating to the transformation of the Mall/Cribbs Causeway into a sustainable mixed use centre has been deleted.

4.22 Sustainability Implications: Overall, the modifications proposed to the three policies in relation to the coordinated delivery of the new neighbourhoods has positive sustainability impacts. However the Gypsy/Traveller modifications are considered to have a negative impact on sustainability given that the commitment to the delivery of pitches, and thus mixed and balanced communities, is weakened as well as potentially

leading to increased pressure to accommodate pitches in the Green Belt and open countryside locations.

4.23 The modification regarding the transformation of the Mall/Cribbs Causeway is also considered to have negative sustainability impacts on Policy CS26. The Council has a clear vision for Cribbs/Patchway, founded on the key principles of improving the diversity, integration and connectivity of Cribbs/Patchway in its own right and with adjoining communities. Given the scale of development proposed through Policy CS26 as amended by the Inspector, it is essential that this key place making component of the policy is maintained in order to maximise positive sustainability impacts.

4.24 **Sevenside** – a significant number of changes are proposed to Chapter 17 to recognise the changing context at Sevenside and to reflect the current multi-agency approach to delivering a strategic solution to mitigate the various environmental constraints.

4.25 **Sustainability Implications:** The main modification to Policy CS35 is potentially more positive than the submission policy, as this policy recognised the significant environmental constraints to development but not the means to address it.

4.26 **Major Infrastructure** – a significant number of changes are proposed to Chapter 18 of the Core Strategy. The majority of these changes, which have been taken forward from a Statement of Common Ground between the Council and Horizon Nuclear Power (see Examination Library ref: SS26), are presentational and process based and therefore do not have significant impacts on sustainability objectives. However Policy CS37 is subject to a proposed Main Modification introduced by the Inspector which amends the Council's approach to now refer to seeking community benefits from nuclear development at Oldbury rather than requiring them.

4.27 **Sustainability Implications:** It is considered that the main modification to CS37 weakens the policy in its ability to secure community benefits, thus potentially negatively impacting on sustainability objectives; particularly those related to social and economic objectives.

4.28 **General Policies** – a number of main modifications are proposed to the Core Strategy's policy framework which are appraised in Appendix 1.

4.29 **Sustainability Implications:** overall, where they might impact on sustainability objectives, the impacts of the majority of the modifications are positive or neutral, because they either provide further clarification or ensure compliance with the NPPF. Potential negative impacts have been identified in relation to Gypsy/Traveller site provision in CS21 where commitment to delivering pitches in the new neighbourhoods has been weakened. However, ensuring that a robust evidence base to determine need for pitches is formulated could help to ensure that need in the district can be met.

4.30 A negative impact is also identified in relation to CS8, where the inspector's modification preferring to 'encourage' measures to reduce greenhouse emissions rather than 'require' measures potentially weakens the commitment to reduce greenhouse gas

emissions, thereby negatively impacting on this SA objective. CS1 has been subject to modifications which are considered in part to have a negative sustainability impact but which overall have a positive impact.

4.31 **New Policy CS4A**: New Policy CS4A sets out processes related to how the Council will positively consider planning applications.

4.32 **Sustainability Implications**: this policy has been found to have positive impacts on sustainability objectives, however given its process orientated non-specific nature it is not possible to appraise the policy in detail against individual SA objectives.

5. Habitats Regulations Assessment

5.1 Appendix 2 contains an addendum to the Habitats Regulations Assessment March 2011 that accompanied the submission of the Core Strategy.

5.2 The addendum concludes that none of the draft main modifications would have a significant adverse effect on European sites of nature conservation importance.

Appendix 1 – Appraisals of Draft Main Modifications to individual policies

Appraisal Matrices

Policy CS1 High Quality Design

Scoring system:

√√ = Major positive effect

xx = Major negative effect

? = Effect unknown/depends on implementation of policy

√ = Positive effect

o = not applicable

√/x = Both positive and negative effects

x = Negative effect

Two main modifications which impact on sustainability objectives have been proposed by the Inspector. One is the inclusion of a requirement for development to meet building regulations current at the time of full or reserved matters planning approvals. The second is a change from ‘requiring’ to ‘encouraging’ developments to meet code for sustainable homes level 3 (level 4 post-2013).

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	o	o
Comments: <ul style="list-style-type: none"> SA Objective not relevant to proposed modification 		

<p>2. Support communities that meet people's needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications 		

<p>3. Develop the economy in ways that meet people's needs 3.1 Give everyone access to satisfying work opportunities, paid or unpaid 3.2 Help everyone afford a comfortable standard of living 3.3 Reduce poverty and income inequality 3.4 Meet needs locally 3.5 Increase the circulation of wealth within the region 3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications 		

<p>4. Provide access to meet people’s needs with least damage to communities and the environment</p> <p>4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change) 5.2 Promote the conservation and wise use of land 5.3 Protect and enhance landscape and townscape 5.4 Value and protect diversity and local distinctiveness including rural ways of life 5.5 Maintain and enhance cultural and historical assets 5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and ‘greenhouse’ emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p style="text-align: center;">√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • There is a risk that large parts of the new neighbourhoods will be built out to 2010 building regulations post 2016 due to the building regulations prior registration procedures. • The inclusion of a requirement for development to meet building regulations current at the time of full or reserved matters planning approvals has a positive impact on the SA objective. Subject to the Government’s implementation of Zero Carbon building policy, the proposed modifications seek to ensure that developments are constructed to the most up-to-date building regulations at the time of detailed planning approval. • The change from ‘requiring’ to ‘encouraging’ developments to meet code for sustainable homes level 3 (level 4 post-2013) is considered to have a negative sustainability impact on this objective by weakening the policy which may result in less sustainable construction in the short term. • On balance the overall impact on this SA objective is considered to be positive. 		

Appraisal Matrices

Policy CS4 – Renewable or Low Carbon District Heat Networks

Scoring system:

√√ = Major positive effect

xx = Major negative effect

? = Effect unknown/depends on implementation of policy

√ = Positive effect

o = not applicable

√/x = Both positive and negative effects

x = Negative effect

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	o	o
Comments: <ul style="list-style-type: none"> SA Objective not relevant to proposed modification 		

2. Support communities that meet people’s needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities	o	o
Comments: <ul style="list-style-type: none"> SA Objective not relevant to proposed modification 		

3. Develop the economy in ways that meet people's needs 3.1 Give everyone access to satisfying work opportunities, paid or unpaid 3.2 Help everyone afford a comfortable standard of living 3.3 Reduce poverty and income inequality 3.4 Meet needs locally 3.5 Increase the circulation of wealth within the region 3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising	Proposed Modification 0	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) 0
Comments: <ul style="list-style-type: none"> SA Objective not relevant to proposed modification 		

4. Provide access to meet people's needs with least damage to communities and the environment 4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.	Proposed Modification 0	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) 0
Comments: <ul style="list-style-type: none"> SA Objective not relevant to proposed modification 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification ((position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modification 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p style="text-align: center;">?</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">?</p>
<p>Comments:</p> <ul style="list-style-type: none"> The modifications are intended to clarify the policy and thereby assist its implementation. The modification provides for viability to be taken into account in the determination of planning applications, therefore it is not possible to determine what effects this would have on sustainability given that the circumstances will be site specific. 		

Appraisal Matrices – Model Policy CS4A

Scoring system:

√√ = Major positive effect xx = Major negative effect ? = Effect unknown/depends on implementation of policy
 √ = Positive effect o = not applicable √/x = Both positive and negative effects
 x = Negative effect

SA Objectives	Proposed Modifications (New Policy CS4A and paragraphs 6.4a to 6.4d)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
All objectives	√√	√√
<p>Comments:</p> <ul style="list-style-type: none"> • Policy CS4A sets out processes related to how the Council will consider planning applications. Therefore its direct and specific sustainability impacts on the ground cannot be appraised in detail with any certainty. However, given that the policy sets out how the Council will <i>positively</i> consider proposals for development, in line with the NPPF and the presumption in favour of sustainable development, the policy may have beneficial sustainability impacts in terms of bringing sustainable development forward. However this must not be at the expense of sustainability objectives and the policy contains safeguards to ensure that this would not be the case. • Given that the policy is unlikely to have direct and specific impacts on the ground, but that it may have positive effects for bringing sustainable development forward, the policy generally scores as well against sustainability objectives as the Core Strategy does overall. The policy’s supporting paragraphs recognise the importance of bringing forward sustainable development and this reinforces the policy’s message. • It is not considered that the introduction of the policy significantly improves the overall sustainability of the Core Strategy, therefore the proposed modification receives the same high sustainability score as the December 2011 Core Strategy. • Given its process orientated non-specific and strategic nature it is not possible or appropriate to appraise the policy in detail against each SA objective. 		

Appraisal Matrices – Policy CS5 Location of Development

Scoring system:

√√ = Major positive effect xx = Major negative effect ? = Effect unknown/depends on implementation of policy
√ = Positive effect o = not applicable √/x = Both positive and negative effects
x = Negative effect

The majority of the modifications to Policy CS5 clarify approaches to changes to Green Belt boundaries, small scale development (in Green Belt and non-Green Belt locations), processes and timescales for bringing forward development. The specific changes are summarised as follows:

- **Small scale development:** the amended policy allows non-strategic small scale development to come forward that is within and well related to settlement boundaries, where it is in accordance with new criterion 7. Criterion 7 sets out the criteria that can be used to permit non strategic changes to the Green Belt boundaries to facilitate development of housing and other land uses, which will be delivered through the Policies, Sites and Places DPD or Neighbourhood Plans.
- **Neighbourhood Planning initiatives and rural housing exception site policy:** this modification recognises that small scale development within or well related to villages or settlements without defined settlement boundaries may come forward through these mechanisms.
- **Small scale development in non Green Belt rural areas:** this modification identifies the criteria that are applicable when considering residential in non Green Belt locations and limits the size of development to ‘up to 30 dwellings’.
- **Community Right to Built Orders in Green Belt locations:** this modification recognises that no Green Belt boundary change is necessary for development brought through these Orders.
- **Rural Exception sites in Green Belt locations:** this modification notes that no change to Green Belt boundaries are required for the delivery of Rural Exception sites in accordance with government policy.
- **Settlement boundaries in rural areas:** the modifications clarify the approach to reviewing settlement boundaries. As this area of the modifications is process based, and as it does not significantly alter the previous policy position it is not considered that it will impact on sustainability and is therefore not relevant to the SA Objectives.
- **Green Belt:** the modifications clarify the approach to reviewing Green Belt boundaries. The policy, together with new paragraph 6.8a, set out that only non-strategic changes to the Green Belt will be permitted through the Sites, Policies & Places DPD or neighbourhood plans and that non-strategic is defined as development of up to 30 dwellings or 1 ha.

In summary, the Inspector recommends modifications to Policy CS5 to facilitate development for housing and other land uses in non strategic sites of to up to 30 dwellings both in Green Belt and rural area locations, with this to be delivered through the Policies, Sites and Places DPD and/or neighbourhood plans.

Any sites that came forward through this process would need to be consistent with the NPPF Green Belt policy. This in order to be satisfied that any development would not be harmful to the countryside or Green Belt purposes. Although the Inspector is not advocating this pattern of development, a potential consequence of further non-strategic development, whether individually or cumulatively, would be a further loss of Green Belt and open countryside. This situation could be made worse in instances where the Green Belt and/or open countryside buffer between settlements is particularly narrow and already under some pressure. These negative sustainability effects are considered to outweigh whatever economic benefits may arise from providing more flexibility in housing land supply.

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	x	√
Comments: <ul style="list-style-type: none"> • Although the Inspector is not advocating this pattern of development, a potential consequence of further non-strategic development, whether individually or cumulatively, would be a further loss of Green Belt and open countryside. This situation could be made worse in instances where the Green Belt and/or open countryside buffer between settlements is particularly narrow and already under some pressure. • Development in the countryside can also impact on healthy lifestyles through potential negative impacts on access and public rights of way. 		

<p>2. Support communities that meet people's needs</p> <p>2.1 Help make suitable housing available and affordable for everyone</p> <p>2.2 Give everyone access to learning, training, skills and knowledge</p> <p>2.3 Reduce crime and fear of crime</p> <p>2.4 Promote stronger and more vibrant communities</p> <p>2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p style="text-align: center;">X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Although the Inspector is not advocating this pattern of development, a potential consequence of further non-strategic development, whether individually or cumulatively, would be a further loss of Green Belt and open countryside. This situation could be made worse in instances where the Green Belt and/or open countryside buffer between settlements is particularly narrow and already under some pressure. • Locating development in rural areas and the open countryside that are not well served by services and facilities will not promote stronger communities nor will it give good access to learning facilities if schools are not within walking distance. • These negative sustainability effects are considered to outweigh whatever benefits may arise from increasing housing supply. 		

<p>3. Develop the economy in ways that meet people's needs</p> <p>3.1 Give everyone access to satisfying work opportunities, paid or unpaid</p> <p>3.2 Help everyone afford a comfortable standard of living</p> <p>3.3 Reduce poverty and income inequality</p> <p>3.4 Meet needs locally</p> <p>3.5 Increase the circulation of wealth within the region</p> <p>3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>Proposed Modification</p> <p style="text-align: center;">X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Although the Inspector is not advocating this pattern of development, a potential consequence of further non-strategic development, whether individually or cumulatively, would be a further loss of Green Belt and open countryside. This situation could be made worse in instances where the Green Belt and/or open countryside buffer between settlements is particularly narrow and already under some pressure. These negative sustainability effects are considered to outweigh whatever economic benefits may arise from providing more flexibility in housing land supply. • Locating development in rural areas and the open countryside that are not well served by services and facilities will not allow the needs of new residents to be met locally. • These potential negative sustainability effects are considered to outweigh whatever economic benefits may arise from new development. 		

<p>4. Provide access to meet people’s needs with least damage to communities and the environment</p> <p>4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>Proposed Modification</p> <p>X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Although the Inspector is not advocating this pattern of development, a potential consequence of further non-strategic development, whether individually or cumulatively, would be a further loss of Green Belt and open countryside. This situation could be made worse in instances where the Green Belt and/or open countryside buffer between settlements is particularly narrow and already under some pressure. • Locating development in rural areas and the open countryside that are not well served by services and public transport facilities will result in increased usage of the private car as a means to access services. 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p>X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>√</p>
<p>Comments:</p> <ul style="list-style-type: none"> Although the Inspector is not advocating this pattern of development, a potential consequence of further non-strategic development, whether individually or cumulatively, would be a further loss of Green Belt and open countryside. This situation could be made worse in instances where the Green Belt and/or open countryside buffer between settlements is particularly narrow and already under some pressure. This therefore would have negative effects on this sustainability objective. 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and ‘greenhouse’ emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p>X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Although the Inspector is not advocating this pattern of development, a potential consequence of further non-strategic development, whether individually or cumulatively, would be a further loss of Green Belt and open countryside. This situation could be made worse in instances where the Green Belt and/or open countryside buffer between settlements is particularly narrow and already under some pressure. • Locating development in rural areas and the open countryside that are not well served by services and public transport facilities will result in increased usage of the private car as a means to access services, thus increasing greenhouse emissions. 		

Appraisal Matrices

Policy CS6 - Infrastructure & Developer Contributions

Scoring system:

√√ = Major positive effect

xx = Major negative effect

? = Effect unknown/depends on implementation of policy

√ = Positive effect

o = not applicable

√/x = Both positive and negative effects

x = Negative effect

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	o	o
Comments: <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications 		

<p>2. Support communities that meet people's needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p style="text-align: center;">?</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">?</p>
<p>Comments:</p> <ul style="list-style-type: none"> The modifications introduce viability as a material consideration in the determination of planning applications. This may lead to the development of more housing but could reduce funding for infrastructure that would normally be expected to be achieved through developer contributions. It is not possible to determine what effects this would have on this SA objective given that circumstances will be site specific. 		

3. Develop the economy in ways that meet people's needs 3.1 Give everyone access to satisfying work opportunities, paid or unpaid 3.2 Help everyone afford a comfortable standard of living 3.3 Reduce poverty and income inequality 3.4 Meet needs locally 3.5 Increase the circulation of wealth within the region 3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising	Proposed Modification ?	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) ?
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Comments:

- The modifications introduce viability as a material consideration in the determination of planning applications. This may lead to the development of more employment opportunities but could reduce funding for infrastructure that would normally be expected to be achieved through developer contributions. It is not possible to determine what effects this would have on this SA objective given that circumstances will be site specific.

4. Provide access to meet people's needs with least damage to communities and the environment 4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.	Proposed Modification 0	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) 0
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Comments:

- SA Objective not relevant to proposed modifications

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications 		

Appraisal Matrices Policy CS7, para 7.6 bullet point re:

Appropriate highway mitigation measures on surrounding routes, including the Strategic Road Network which is likely to include M5 Junctions 16 and 17 subject to the assessment of the cumulative impacts of development and the delivery of other transport measures set out in the Core Strategy over the plan period.

Scoring system:

√√ = Major positive effect xx = Major negative effect ? = Effect unknown/depends on implementation of policy
 √ = Positive effect o = not applicable √/x = Both positive and negative effects
 x = Negative effect

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	√/x	√/x
<p>Comments:</p> <ul style="list-style-type: none"> The modification to paragraph 7.6 recognises the need to improve capacity at local highway junctions which may encourage the use of cars, with negative impacts on healthy lifestyles, but it may also assist smooth traffic flows; reducing congestion and consequent air pollution. It may also therefore encourage the use of bus based public transport. 		

<p>2. Support communities that meet people’s needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p>√/X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) √/X</p>
<p>Comments:</p> <ul style="list-style-type: none"> The modification to paragraph 7.6 recognises the need to improve capacity at local highway junctions which may encourage the use of cars, with negative impacts for some sections of the community with regard access to learning and promotion of stronger communities, but it may also assist smooth traffic flows and reduced congestion. It may therefore also encourage the use of bus based public transport with positive impacts for access to learning and participation in cultural activities etc. 		

<p>3. Develop the economy in ways that meet people's needs</p> <p>3.1 Give everyone access to satisfying work opportunities, paid or unpaid</p> <p>3.2 Help everyone afford a comfortable standard of living</p> <p>3.3 Reduce poverty and income inequality</p> <p>3.4 Meet needs locally</p> <p>3.5 Increase the circulation of wealth within the region</p> <p>3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>Proposed Modification</p> <p style="text-align: center;">√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">√/x</p>
<p>Comments:</p> <ul style="list-style-type: none"> The modification to paragraph 7.6 recognises the need to improve capacity at local highway junctions which may encourage the use of cars, with negative impacts for some sections of the community with regard access to employment opportunities, but it may also assist smooth traffic flows and reduced congestion. It may therefore also encourage the use of bus based public transport with positive impacts for access to employment opportunities for some. 		

<p>4. Provide access to meet people's needs with least damage to communities and the environment</p> <p>4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>Proposed Modification</p> <p style="text-align: center;">√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">√/x</p>
<p>Comments:</p> <ul style="list-style-type: none"> The modification to paragraph 7.6 recognises the need to improve capacity at local highway junctions which may encourage the use of cars, with negative impacts for other travel options, but may also assist to reduce congestion and therefore the smooth running of bus based public transport. 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change) 5.2 Promote the conservation and wise use of land 5.3 Protect and enhance landscape and townscape 5.4 Value and protect diversity and local distinctiveness including rural ways of life 5.5 Maintain and enhance cultural and historical assets 5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications. 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications. 		

Appraisal Matrices

Policy CS8 – Improving Accessibility

Scoring system:

√√ = Major positive effect

xx = Major negative effect

? = Effect unknown/depends on implementation of policy

√ = Positive effect

o = not applicable

√/x = Both positive and negative effects

x = Negative effect

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	o	o
Comments: <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications 		

2. Support communities that meet people’s needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities	o	o
Comments: <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications 		

3. Develop the economy in ways that meet people's needs 3.1 Give everyone access to satisfying work opportunities, paid or unpaid 3.2 Help everyone afford a comfortable standard of living 3.3 Reduce poverty and income inequality 3.4 Meet needs locally 3.5 Increase the circulation of wealth within the region 3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising	Proposed Modification 0	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) 0
Comments: <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications 		

4. Provide access to meet people's needs with least damage to communities and the environment 4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.	Proposed Modification √√	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) √
Comments: <ul style="list-style-type: none"> The modifications strengthen commitment to the provision of infrastructure to support ultra low emission vehicles and broadband technology, positively impacting on this SA objective. 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p style="text-align: center;">O</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">O</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p style="text-align: center;">X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">√</p>
<p>Comments:</p> <ul style="list-style-type: none"> The inspector's modification of preferring to 'encourage' measures to reduce greenhouse emissions rather than 'require' measures weakens the commitment to reducing greenhouse gas emissions, thereby negatively impacting on this SA objective. 		

Appraisal Matrices

Policy CS9 – Managing the Environment and Heritage

Scoring system:

√√ = Major positive effect

xx = Major negative effect

? = Effect unknown/depends on implementation of policy

√ = Positive effect

o = not applicable

√/x = Both positive and negative effects

x = Negative effect

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	o	o
Comments: <ul style="list-style-type: none"> SA Objective not relevant to proposed modification 		

2. Support communities that meet people’s needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities	o	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) o
Comments: <ul style="list-style-type: none"> SA Objective not relevant to proposed modification 		

3. Develop the economy in ways that meet people's needs 3.1 Give everyone access to satisfying work opportunities, paid or unpaid 3.2 Help everyone afford a comfortable standard of living 3.3 Reduce poverty and income inequality 3.4 Meet needs locally 3.5 Increase the circulation of wealth within the region 3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising	Proposed Modification 0	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) 0
Comments: <ul style="list-style-type: none"> SA Objective not relevant to proposed modification 		

4. Provide access to meet people's needs with least damage to communities and the environment 4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.	Proposed Modification 0	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) 0
Comments: <ul style="list-style-type: none"> SA Objective not relevant to proposed modification 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p style="text-align: center;">√√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • The separation of the elements formerly covered in criterion 1 of the policy (which aimed to be all-encompassing) into separate parts (heritage, landscape, ecology) removes any ambiguity which existed before and also increases the breadth of what is covered by the policy itself. • The proposed modifications reflect the changes to national policy brought about through the National Planning Policy Framework and represent a strengthening of Policy CS9. Proposed additions to the supporting text and Glossary add further clarity and guidance to how the policy should be applied. Although Policy CS9 would still score highly against these SA objectives without the modifications proposed, their addition ensures that the positive impacts are maximised. 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modification 		

Appraisal Matrices

Policy CS14 – Town centres and retail

Scoring system:

√√ = Major positive effect

√ = Positive effect

x = Negative effect

xx = Major negative effect

o = not applicable

? = Effect unknown/depends on implementation of policy

√/x = Both positive and negative effects

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	√/x	x
<p>Comments:</p> <ul style="list-style-type: none"> • Retail floorspace expansion at Cribbs Causeway to serve the wider sub-region would have a major negative impact on Objective 1.3 as it would encourage use of the car instead of walking/cycling. • While the modification appears to help support vitality and viability of existing centres in South Gloucestershire, helping to meet needs locally, given the limited capacity of existing centres to accommodate this level of growth, there is a strong likelihood of pressure for it coming forward in out of centre locations. This would therefore have the direct opposite of the intended effect and would encourage car based travel to those out of centre locations. • Focusing new retail floorspace in centres provides the opportunity to walk/cycle, but could increase the attractiveness of certain centres over others and encourage car travel. 		

<p>2. Support communities that meet people's needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p>√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>√</p>
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Comments:

- The policy supports town centre vitality and viability. The modification places greater emphasis on this through the removal of a significant amount of floorspace growth at Cribbs Causeway.
- While the modification appears to help support vitality and viability of existing centres in South Gloucestershire, helping to meet needs locally, given the limited capacity of existing centres to accommodate this level of growth, there is a strong likelihood of pressure for it coming forward in out of centre locations. This would therefore have the direct opposite of the intended effect by potentially supporting increased out of centre development.

<p>3. Develop the economy in ways that meet people's needs 3.1 Give everyone access to satisfying work opportunities, paid or unpaid 3.2 Help everyone afford a comfortable standard of living 3.3 Reduce poverty and income inequality 3.4 Meet needs locally 3.5 Increase the circulation of wealth within the region 3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>Proposed Modification</p> <p>√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>√</p>
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Comments:

- Retail expansion generates jobs and wealth, and increases the circulation of wealth within the region. The modification will generate a lower level of jobs and wealth, but will ensure needs are met within South Gloucestershire.

<p>4. Provide access to meet people's needs with least damage to communities and the environment</p> <p>4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>Proposed Modification</p> <p style="text-align: center;">√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">X</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Retail floorspace expansion at Cribbs Causeway to serve the wider sub-region would have a major negative impact as it would encourage use of the car instead of walking/cycling • Focusing new retail floorspace in centres provides the opportunity to walk/cycle, but could increase the attractiveness of certain centres and encourage car travel. • While the modification appears to help support vitality and viability of existing centres in South Gloucestershire, which are generally more accessible by sustainable forms of transport than out of centre locations, given the limited capacity of existing centres to accommodate this level of growth, there is a strong likelihood of pressure for it coming forward in out of centre locations. This would therefore have the direct opposite of the intended effect by potentially supporting increased out of centre development, leading to an increase in car usage and unsustainable travel patterns. 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modification. 		

<p>6. Minimise consumption of natural resources 6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions 6.2 Keep water consumption within local carrying capacity limits (taking account of climate change) 6.3 Minimise consumption and extraction of minerals 6.4 Reduce waste not put to any use 6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p style="text-align: center;">X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">X</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Retail floorspace expansion at Cribbs Causeway to serve the wider sub-region would have a major negative impact as it would encourage use of the car and consequent 'greenhouse' emissions instead of walking/cycling. • Focusing new retail floorspace in centres provides the opportunity to walk/cycle, but could increase the attractiveness of certain centres and encourage car travel. • While the modification appears to help support vitality and viability of existing centres in South Gloucestershire, which are generally more accessible by sustainable forms of transport than out of centre locations, given the limited capacity of existing centres to accommodate this level of growth, there is a strong likelihood of pressure for it coming forward in out of centre locations. This would therefore have the direct opposite of the intended effect by potentially supporting increased out of centre development, leading to an increase in car usage and unsustainable travel patterns and increased emissions. • The modification should have a more positive effect on Objective 6.3 as it involves less development. 		

Appraisal Matrices – Policy CS15 Distribution of housing and Paragraph 10.6a – introduction requirement for interim housing statement

Scoring system:

√√ = Major positive effect xx = Major negative effect ? = Effect unknown/depends on implementation of policy
√ = Positive effect o = not applicable √/x = Both positive and negative effects
x = Negative effect

A number of modifications have been made to the policy. The Inspector has recommended that the housing quantum up to 2027 should be a minimum of 28,355 – the Inspector has therefore accepted the Council’s position that Core Strategy makes provision for 26,855 dwellings with the addition of 1500 dwellings from small site (1-9) windfall sources during the first 10 years of the plan. The uplift of the housing quantum in the Inspector’s draft main modifications from that identified in the December 2011 Core Strategy incorporating Post-Submission Changes to 28,355 represents a material change in circumstance which must be assessed against reasonable alternatives.

Reasonable alternative development sites were assessed in the Initial SA Report that accompanied the 2008 Issues & Options document and in the SA Report that accompanied the March 2010 Draft Core Strategy (and subsequent December 2010 Core Strategy). Those reasonable alternatives were then reconsidered afresh against SA Objectives by the Council in preparing the December 2011 Core Strategy incorporating Post-Submission Changes, as alternative options for meeting the uplift in the housing target then identified at that stage.

The uplift in the overall housing quantum increases the potential amount of development to be delivered in South Gloucestershire, potentially positively impacting on some SA objectives by providing development to support local communities. However it is not possible to appraise the effects with any certainty as the location, nature and quantum of future potential windfall developments are not known. In any case, windfall sites are specified to comprise sites of between 1 and 9 dwellings only, and would be likely to come forward in urban areas more than rural ones, and anyway would need to be consistent with development management policies and the NPPF. Therefore any impacts on SA objectives are considered on balance to not be significant.

The Inspector has also indicated a 20% ‘bring forward supply’ is added to the first five year period of the Core Strategy to comply with paragraph 47 of the National Planning Policy Framework. The impacts on sustainability objectives of the introduction of the 20% buffer, based on the options set out in paragraph 10.6a and Policy CS5 as proposed to be modified by the Inspector, have been assessed as follows:

- 4) **Impact of bringing forward sites identified in the Core Strategy earlier, therefore phasing some development earlier.** This is not considered to negatively impact on SA objectives as the sites identified in the Core Strategy have been subject to Sustainability Appraisal and have been found to be the most sustainable and appropriate options for development;
- 5) **Impact of reviewing capacity on sites proposed in the Core Strategy process in order to increase the number of deliverable dwellings.** This is not considered to impact negatively on sustainability objectives as long as changes to capacity, such as by increasing densities in some locations, adhere to the Local Plan's policy framework and the NPPF which encourage sustainable, viable and deliverable development; and/or
- 6) **Impact of identifying additional sites.** This may be done by:
- a. **bringing forward sites through the Development Management process.** Where sites are brought forward in a manner consistent with Development Management policies and the NPPF, the sustainability impacts are likely to be limited/neutral. However a possible weakness of this approach is where decisions are made through the appeal process, thereby possibly giving less weight to the plan-led system. While it is recognised that the Inspector is not advocating a dispersed development strategy and/or the need to bring forward housing sites in the countryside/Green Belt locations, a possible consequence of the changes made to CS15, that reflect current Government policy to provide more flexibility in housing land supply, could result in instances where this may arise. Any sites, other than those already considered and dismissed through the Core Strategy process, that come forward through this route will not have been identified in the Council's Local Plan and therefore would not have been subject to Sustainability Appraisal. Because it is not known where these possible sites might be located it is not possible to appraise them. However it is considered likely that they would either be omission sites already promoted and rejected through the Core Strategy process, or other rural sites not compliant with the Local Plan and the NPPF; or
 - b. **the production of an Interim Housing Statement which may identify one or more omission sites that were promoted through the Core Strategy's production** (e.g. but not exhaustively - Engine Common, Morton Way (Thornbury), Woodlands Farm (Frampton Cotterell) or East of Chipping Sodbury). The distribution of development in the Core Strategy has been subject to Sustainability Appraisal which resulted in the dismissal of a spatial strategy that sought to disperse growth to Green Belt and rural locations beyond the communities of the Bristol North and East Fringes and the market towns of Yate/chipping Sodbury and Thornbury. Although a strategy of bringing forward more development in rural areas might solve a shortfall and therefore contribute to construction rates in the district, the Inspector has not advocated this pattern of development. Instead, Policy CS5 as amended by the Inspector sets out the process by which the justification for how the release of land for non-strategic development for residential and other forms of development, for Green Belt and non-Green Belt locations, may

come forward. Notwithstanding these issues, and recognising the due process needed to be undertaken for future DPDs or Neighbourhood Plans, the introduction of any alternative sites outside of Core Strategy processes undertaken to date, or any other DPD process, through a non-statutory document such as an Interim Housing Statement as indicated under the Inspector's new paragraph 10.6a, is also considered to be potentially contrary to the objectives of Strategic Environment Assessment and Sustainability Appraisal. Negative sustainability impacts have therefore been identified in relation to the changes made to Policy CS15.

Any introduction of new development sites through an Interim Housing Statement that would lead to residential development in open countryside in demonstrably unsustainable locations would negatively impact on local communities and SA objectives. Moreover, should any sites that come forward through this process be demonstrated to be contrary to Green Belt purposes, this would lead to negative sustainability impacts. As the Interim Housing Statement does not have the status of a development plan or neighbourhood plan and is not subject to due process, the final arbitrator in the event of sites coming forward that are not in conformity with Council's Local Plan would be the development management appeal process.

The Inspector's increase in the housing requirement of 1500 dwellings, based on an allowance for small (1-9 dwellings) on windfall sites to a new total for the period of 28,355 may not appear significant, but if development is allowed to come forward via a potential planning by appeal process (as outlined in item 3 a above), then this could have implications for the Green Belt, the wider countryside and thus sustainability objectives. Furthermore, given the current economic and financial circumstances, demand for new homes is likely to remain weak. This raises questions over whether the development sector will actually be able to achieve the construction rates now set out in Policy CS15.

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	o/?/x	√
<p>Comments:</p> <ul style="list-style-type: none"> • Uplift of total housing requirement from “up to 26,400” to “a minimum of 28,355”: this modification is not relevant to this SA objective. • Introduction of 20% buffer: options 1 and 2 identified above are not considered to impact negatively on sustainability objectives as long as changes to capacity, such as by increasing densities in some locations, adhere to the Local Plan’s policy framework and the NPPF which encourage sustainable, viable and deliverable development. However the bringing forward of supply would have to be matched by the bringing forward of required infrastructure so as not to result in unsustainable development. • Option 3a: Where sites are brought forward in a manner consistent with Development Management policies and the NPPF, the sustainability impacts are likely to be limited/neutral. However a possible weakness of this approach is where decisions are made through the appeal process, thereby possibly giving less weight to the plan-led system. While it is recognised that the Inspector is not advocating a dispersed development strategy and/or the need to bring forward housing sites in the countryside/Green Belt locations, a possible consequence of the changes made to CS15, that reflect current Government policy to provide more flexibility in housing land supply, could result in instances where this may arise. Any sites, other than those already considered and dismissed through the Core Strategy process, that come forward through this route will not have been identified in the Council’s Local Plan and therefore would not have been subject to Sustainability Appraisal. Because it is not known where these possible sites might be located it is not possible to appraise them. However it is considered likely that they would either be omission sites already promoted and rejected through the Core Strategy process, or other rural sites not compliant with the Local Plan and the NPPF. • Development in the countryside can impact on healthy lifestyles through potential negative impacts on access and public rights of way. Any introduction of new development sites through an Interim Housing Statement that would lead to residential development in open countryside in demonstrably unsustainable locations would negatively impact on local communities and SA objectives. 		

<p>2. Support communities that meet people’s needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p>?/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Uplift of total housing requirement from “up to 26,400” to “a minimum of 28,355”: this modification increases the potential amount of development to be delivered in South Gloucestershire, positively impacting on this SA objective by providing limited development to support local communities. However it is not possible to appraise the effects with any certainty as the location, nature and quantum of future potential windfall developments are not known. In any case, as windfall sites are specified to comprise sites of between 1 and 9 dwellings only, their impacts on SA objectives would not be significant. • Introduction of 20% buffer: options 1 and 2 identified above are not considered to impact negatively on sustainability objectives as long as changes to capacity, such as by increasing densities in some locations, adhere to the Local Plan’s policy framework and the NPPF which encourage sustainable, viable and deliverable development. However the bringing forward of supply would have to be matched by the bringing forward of required infrastructure so as not to result in unsustainable development. • Option 3a: Where sites are brought forward in a manner consistent with Development Management policies and the NPPF, the sustainability impacts are likely to be limited/neutral. However a possible weakness of this approach is where decisions are made through the appeal process, thereby possibly giving less weight to the plan-led system. While it is recognised that the Inspector is not advocating a dispersed development strategy and/or the need to bring forward housing sites in the countryside/Green Belt locations, a possible consequence of the changes made to CS15, that reflect current Government policy to provide more flexibility in housing land supply, could result in instances where this may arise. Any sites, other than those already considered and dismissed through the Core Strategy process, that come forward through this route will not have been identified in the Council’s Local Plan and therefore would not have been subject to Sustainability Appraisal. Because it is not known where these possible sites might be located it is not possible to appraise them. However it is considered likely that they would either be omission sites already promoted and rejected through the Core Strategy process, or other rural sites not compliant with the Local Plan and the NPPF. • Any introduction of new development sites through an Interim Housing Statement that would lead to residential development in open countryside in demonstrably unsustainable locations that are not well served by services and facilities will not promote stronger communities nor will it give good access to learning facilities if schools are not within walking distance and thus would negatively impact on local communities and SA objectives. • These negative sustainability effects are considered to outweigh whatever benefits may arise from increasing housing supply. 		

<p>3. Develop the economy in ways that meet people's needs</p> <p>3.1 Give everyone access to satisfying work opportunities, paid or unpaid</p> <p>3.2 Help everyone afford a comfortable standard of living</p> <p>3.3 Reduce poverty and income inequality</p> <p>3.4 Meet needs locally</p> <p>3.5 Increase the circulation of wealth within the region</p> <p>3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>Proposed Modification</p> <p>*/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Uplift of total housing requirement from “up to 26,400” to “a minimum of 28,355”: this modification increases the potential amount of development to be delivered in South Gloucestershire, positively impacting on this SA objective by providing limited development to support the economy. However it is not possible to appraise the effects with any certainty as the location, nature and quantum of future potential windfall developments are not known. In any case, as windfall sites are specified to comprise sites of between 1 and 9 dwellings only, their impacts on SA objectives would not be significant. • Introduction of 20% buffer: options 1 and 2 identified above are not considered to impact negatively on sustainability objectives as long as changes to capacity, such as by increasing densities in some locations, adhere to the Local Plan’s policy framework and the NPPF which encourage sustainable, viable and deliverable development. However the bringing forward of supply would have to be matched by the bringing forward of required infrastructure so as not to result in unsustainable development. • Option 3a: Where sites are brought forward in a manner consistent with Development Management policies and the NPPF, the sustainability impacts are likely to be limited/neutral. However a possible weakness of this approach is where decisions are made through the appeal process, thereby possibly giving less weight to the plan-led system. While it is recognised that the Inspector is not advocating a dispersed development strategy and/or the need to bring forward housing sites in the countryside/Green Belt locations, a possible consequence of the changes made to CS15, that reflect current Government policy to provide more flexibility in housing land supply, could result in instances where this may arise. Any sites, other than those already considered and dismissed through the Core Strategy process, that come forward through this route will not have been identified in the Council’s Local Plan and therefore would not have been subject to Sustainability Appraisal. Because it is not known where these possible sites might be located it is not possible to appraise them. However it is considered likely that they would either be omission sites already promoted and rejected through the Core Strategy process, or other rural sites not compliant with the Local Plan and the NPPF. • Any introduction of new development sites through an Interim Housing Statement that would lead to residential development in open countryside in demonstrably unsustainable locations would negatively impact on local communities and SA objectives by encouraging dormitory settlement characteristics and increasing the use of the private car which results in congestion and negative impact on the economy. • These negative sustainability effects are considered to outweigh whatever benefits may arise from increasing housing supply. 		

<p>4. Provide access to meet people’s needs with least damage to communities and the environment</p> <p>4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>Proposed Modification</p> <p>?/x</p>	<p>No Modification (p(position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) √</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Uplift of total housing requirement from “up to 26,400” to “a minimum of 28,355”: this modification increases the potential amount of development to be delivered in South Gloucestershire, positively impacting on this SA objective by providing limited development to support local communities. However it is not possible to appraise the effects with any certainty as the location, nature and quantum of future potential windfall developments are not known. In any case, as windfall sites are specified to comprise sites of between 1 and 9 dwellings only, their impacts on SA objectives would not be significant. • Introduction of 20% buffer: options 1 and 2 identified above are not considered to impact negatively on sustainability objectives as long as changes to capacity, such as by increasing densities in some locations, adhere to the Local Plan’s policy framework and the NPPF which encourage sustainable, viable and deliverable development. However the bringing forward of supply would have to be matched by the bringing forward of required infrastructure so as not to result in unsustainable development. • Option 3a: Where sites are brought forward in a manner consistent with Development Management policies and the NPPF, the sustainability impacts are likely to be limited/neutral. However a possible weakness of this approach is where decisions are made through the appeal process, thereby possibly giving less weight to the plan-led system. While it is recognised that the Inspector is not advocating a dispersed development strategy and/or the need to bring forward housing sites in the countryside/Green Belt locations, a possible consequence of the changes made to CS15, that reflect current Government policy to provide more flexibility in housing land supply, could result in instances where this may arise. Any sites, other than those already considered and dismissed through the Core Strategy process, that come forward through this route will not have been identified in the Council’s Local Plan and therefore would not have been subject to Sustainability Appraisal. Because it is not known where these possible sites might be located it is not possible to appraise them. However it is considered likely that they would either be omission sites already promoted and rejected through the Core Strategy process, or other rural sites not compliant with the Local Plan and the NPPF. • Any introduction of new development sites through an Interim Housing Statement that would lead to residential development in open countryside in demonstrably unsustainable locations would negatively impact on local communities and SA objectives. Locating development in rural areas and the open countryside that are not well served by services and public transport facilities will result in increased usage of the private car as a means to access services. • These negative sustainability effects are considered to outweigh whatever benefits may arise from increasing housing supply. 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p>?/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Uplift of total housing requirement from “up to 26,400” to “a minimum of 28,355”: this modification increases the potential amount of development to be delivered in South Gloucestershire. If this results in increased development in open countryside this would have a potential negative effect on this SA objective. However it is not possible to appraise the effects with any certainty as the location, nature and quantum of future potential windfall developments are not known. In any case, as windfall sites are specified to comprise sites of between 1 and 9 dwellings only, their impacts on SA objectives would not be significant. • Introduction of 20% buffer: options 1 and 2 identified above are not considered to impact negatively on sustainability objectives as long as changes to capacity, such as by increasing densities in some locations, adhere to the Local Plan’s policy framework and the NPPF which encourage sustainable, viable and deliverable development. However the bringing forward of supply would have to be matched by the bringing forward of required infrastructure so as not to result in unsustainable development. • Option 3a: Where sites are brought forward in a manner consistent with Development Management policies and the NPPF, the sustainability impacts are likely to be limited/neutral. However a possible weakness of this approach is where decisions are made through the appeal process, thereby possibly giving less weight to the plan-led system. While it is recognised that the Inspector is not advocating a dispersed development strategy and/or the need to bring forward housing sites in the countryside/Green Belt locations, a possible consequence of the changes made to CS15, that reflect current Government policy to provide more flexibility in housing land supply, could result in instances where this may arise. Any sites, other than those already considered and dismissed through the Core Strategy process, that come forward through this route will not have been identified in the Council’s Local Plan and therefore would not have been subject to Sustainability Appraisal. Because it is not known where these possible sites might be located it is not possible to appraise them. However it is considered likely that they would either be omission sites already promoted and rejected through the Core Strategy process, or other rural sites not compliant with the Local Plan and the NPPF. • Any introduction of new development sites through an Interim Housing Statement that would lead to residential development in open countryside in demonstrably unsustainable locations would negatively impact on local communities and SA objectives and would negatively impact on landscape character and local distinctiveness and therefore on this SA objective. This would be contrary to the aims of the plan led system and which would undermine the objectives of Policy CS5. 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and ‘greenhouse’ emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p>?/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>?</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Uplift of total housing requirement from “up to 26,400” to “a minimum of 28,355”: this modification increases the potential amount of development to be delivered in South Gloucestershire. This could result in a negative impact on this SA objective if development is not delivered sustainably. However it is not possible to appraise the effects with any certainty as the location, nature and quantum of future potential windfall developments are not known. In any case, as windfall sites are specified to comprise sites of between 1 and 9 dwellings only, their impacts on SA objectives would not be significant. • Introduction of 20% buffer: options 1 and 2 identified above are not considered to impact negatively on sustainability objectives as long as changes to capacity, such as by increasing densities in some locations, adhere to the Local Plan’s policy framework and the NPPF which encourage sustainable, viable and deliverable development. However the bringing forward of supply would have to be matched by the bringing forward of required infrastructure so as not to result in unsustainable development. • Option 3a: Where sites are brought forward in a manner consistent with Development Management policies and the NPPF, the sustainability impacts are likely to be limited/neutral. However a possible weakness of this approach is where decisions are made through the appeal process, thereby possibly giving less weight to the plan-led system. While it is recognised that the Inspector is not advocating a dispersed development strategy and/or the need to bring forward housing sites in the countryside/Green Belt locations, a possible consequence of the changes made to CS15, that reflect current Government policy to provide more flexibility in housing land supply, could result in instances where this may arise. Any sites, other than those already considered and dismissed through the Core Strategy process, that come forward through this route will not have been identified in the Council’s Local Plan and therefore would not have been subject to Sustainability Appraisal. Because it is not known where these possible sites might be located it is not possible to appraise them. However it is considered likely that they would either be omission sites already promoted and rejected through the Core Strategy process, or other rural sites not compliant with the Local Plan and the NPPF. • Any introduction of new development sites through an Interim Housing Statement that would lead to residential development in open countryside in demonstrably unsustainable locations would negatively impact on local communities and SA objectives by increasing car usage and the associated greenhouse emissions. • The bringing forward of supply to earlier in the plan’s period may have negative impacts on sustainable construction standards, given that a greater level of development could occur prior to the introduction of more sustainable Building regulations. 		

Appraisal Matrices Policy CS18 – Affordable Housing

Scoring system:

√√ = Major positive effect xx = Major negative effect ? = Effect unknown/depends on implementation of policy
 √ = Positive effect o = not applicable √/x = Both positive and negative effects
 x = Negative effect

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	√	?
<p>Comments:</p> <ul style="list-style-type: none"> The modifications reinforce and clarify the commitment to achieving 35% on-site affordable housing as part of new housing developments unless a developer demonstrates that the economic viability of a particular site is affected by specific factors and as a result that a lower percentage should be provided without public subsidy, in which case other financial contributions should be sought to achieve the 35% requirement. The modifications should ensure that the overall delivery of housing, including affordable housing, is not put in doubt by economic viability issues, and that health improvement objectives emanating from new housing provision can be achieved, therefore positively impacting on this SA objective. 		

<p>2. Support communities that meet people’s needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p style="text-align: center;">√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) ?</p>
<p>Comments:</p> <ul style="list-style-type: none"> • The modifications reinforce and clarify the commitment to achieving 35% on-site affordable housing as part of new housing developments unless a developer demonstrates that the economic viability of a particular site is affected by specific factors and as a result that a lower percentage should be provided without public subsidy, in which case other financial contributions should be sought to achieve the 35% requirement. • The modifications should ensure that the overall delivery of housing, including affordable housing, is not put in doubt by economic viability issues, and that such housing will contribute to community objectives, therefore positively impacting on this SA objective. 		

<p>3. Develop the economy in ways that meet people's needs</p> <p>3.1 Give everyone access to satisfying work opportunities, paid or unpaid</p> <p>3.2 Help everyone afford a comfortable standard of living</p> <p>3.3 Reduce poverty and income inequality</p> <p>3.4 Meet needs locally</p> <p>3.5 Increase the circulation of wealth within the region</p> <p>3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>Proposed Modification</p> <p style="text-align: center;">√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">?</p>
<p>Comments:</p> <ul style="list-style-type: none"> • The modifications reinforce and clarify the commitment to achieving 35% on-site affordable housing as part of new housing developments unless a developer demonstrates that the economic viability of a particular site is affected by specific factors and as a result that a lower percentage should be provided without public subsidy, in which case other financial contributions should be sought to achieve the 35% requirement. • The modifications should ensure that the overall delivery of housing, including affordable housing, is not put in doubt by economic viability issues, and that new housing provision will contribute to the development of the wider economy in ways that meet people's needs, therefore positively impacting on this SA objective. 		

<p>4. Provide access to meet people’s needs with least damage to communities and the environment 4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications. 		

<p>5. Maintain and improve environmental quality and assets 5.1 Protect and enhance habitats and species (taking account of climate change) 5.2 Promote the conservation and wise use of land 5.3 Protect and enhance landscape and townscape 5.4 Value and protect diversity and local distinctiveness including rural ways of life 5.5 Maintain and enhance cultural and historical assets 5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications. 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications. 		

Appraisal Matrices

Policy CS19 – Rural Housing Exception Sites

Scoring system:

√√ = Major positive effect

xx = Major negative effect

? = Effect unknown/depends on implementation of policy

√ = Positive effect

o = not applicable

√/x = Both positive and negative effects

x = Negative effect

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	√√	√
<p>Comments:</p> <ul style="list-style-type: none"> The modifications enable Policy CS19 to apply to all rural settlements and not just those with settlement boundaries, provided there is an identified housing need and a local connection. The modification will increase the opportunity for affordable housing to be delivered in the rural areas, thereby increasing social networking and reducing stress caused by being in housing need, therefore positively impacting on this SA objective. Without the modification the policy would still deliver affordable housing in rural areas but in fewer locations. 		

<p>2. Support communities that meet people's needs</p> <p>2.1 Help make suitable housing available and affordable for everyone</p> <p>2.2 Give everyone access to learning, training, skills and knowledge</p> <p>2.3 Reduce crime and fear of crime</p> <p>2.4 Promote stronger and more vibrant communities</p> <p>2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p>√√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • The modifications enable Policy CS19 to apply to all rural settlements and not just those with settlement boundaries, provided there is an identified housing need and a local connection. • The modification will increase the opportunity for suitable affordable housing to be delivered in the rural areas to those in housing need and promote stronger, more vibrant rural communities, therefore positively impacting on this SA objective. Without the modification the policy would still deliver affordable housing in rural areas but in fewer locations. 		

<p>3. Develop the economy in ways that meet people's needs</p> <p>3.1 Give everyone access to satisfying work opportunities, paid or unpaid</p> <p>3.2 Help everyone afford a comfortable standard of living</p> <p>3.3 Reduce poverty and income inequality</p> <p>3.4 Meet needs locally</p> <p>3.5 Increase the circulation of wealth within the region</p> <p>3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>Proposed Modification</p> <p style="text-align: center;">√√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • The modifications enable Policy CS19 to apply to all rural settlements and not just those with settlement boundaries, provided there is an identified housing need and a local connection. • The modification will increase the opportunity for suitable affordable housing to be delivered in the rural areas to those in housing need and have a local connection. The local connection could be due to an existing employment connection to the area. Policy CS19 therefore enables people in housing need to live closer to their work thereby reducing travel costs and helping to provide a comfortable standard of living for all, therefore positively impacting on this SA objective. Without the modification the policy would still deliver affordable housing in rural areas but in fewer locations. 		

<p>4. Provide access to meet people’s needs with least damage to communities and the environment</p> <p>4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>Proposed Modification</p> <p style="text-align: center;">√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">√/x</p>
<p>Comments:</p> <ul style="list-style-type: none"> • The modifications enable Policy CS19 to apply to all rural settlements and not just those with settlement boundaries, provided there is an identified housing need and a local connection. • The modification will increase the opportunity for suitable affordable housing to be delivered in the rural areas. The Policy will have both positive and negative impacts on this SA objective as it will provide opportunities for people to live closer to their work in rural areas, but will also lead to greater travel movements to other facilities and services not provided in rural areas. • Although as the opportunity for delivering rural exception sites would be less, without the modification those sites that are delivered would still have both positive and negative impacts on this SA objective. 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p>X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>X</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Policy CS19 does allow affordable housing to take place in locations where market housing would not normally be allowed and therefore there is potential for some negative impacts on this SA objective. • As the modification to this policy increases the locations where rural exception sites could be delivered the modification therefore increases the potential negative impacts. However this approach to the provision of rural affordable housing is in line with government guidance in the NPPF. • The supporting text to the policy together with other policies in the Core Strategy should ensure that environmental impact can be reduced. 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p>X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>X</p>
<p>Comments:</p> <ul style="list-style-type: none"> As the modification to this policy increases the locations where rural exception sites could be delivered the modification therefore increases the potential negative impacts. However this approach to the provision of rural affordable housing is in line with government guidance in the NPPF. 		

Appraisal Matrices

Policy CS20 – Extra Care Housing

Scoring system:

√√ = Major positive effect

xx = Major negative effect

? = Effect unknown/depends on implementation of policy

√ = Positive effect

o = not applicable

√/x = Both positive and negative effects

x = Negative effect

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	√	?
<p>Comments:</p> <ul style="list-style-type: none"> The modifications strengthen the policy to clarify that Extra Care housing should be provided throughout South Gloucestershire and not only in the new neighbourhoods and that “where viable and appropriate” all schemes should deliver 35% affordable housing units, or in exceptional circumstances, as off-site provision or as a financial payment. The modifications will support the provision of modern housing and associated facilities, specifically for older people, across a wider range of the population than if no modification was made, so potentially contributing to healthier lifestyles and positively impacting on this SA objective. 		

<p>2. Support communities that meet people’s needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p style="text-align: center;">√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) ?</p>
<p>Comments:</p> <ul style="list-style-type: none"> • The modifications strengthen the policy to clarify that Extra Care housing should be provided throughout South Gloucestershire and not only in the new neighbourhoods and that “where viable and appropriate” all schemes should deliver 35% affordable housing units, or in exceptional circumstances, as off-site provision or as a financial payment. • The modifications will support the provision of modern housing and associated facilities, specifically for older people, across a wider area than if no modification was made, so contributing to mixed and inclusive communities and positively impacting on this SA objective. 		

<p>3. Develop the economy in ways that meet people's needs</p> <p>3.1 Give everyone access to satisfying work opportunities, paid or unpaid</p> <p>3.2 Help everyone afford a comfortable standard of living</p> <p>3.3 Reduce poverty and income inequality</p> <p>3.4 Meet needs locally</p> <p>3.5 Increase the circulation of wealth within the region</p> <p>3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>Proposed Modification</p> <p style="text-align: center;">√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">?</p>
<ul style="list-style-type: none"> • The modifications strengthen the policy to clarify that Extra Care housing should be provided throughout South Gloucestershire and not only in the new neighbourhoods and that “where viable and appropriate” all schemes should deliver 35% affordable housing units, or in exceptional circumstances, as off-site provision or as a financial payment. • The modifications will support the provision of modern housing and associated facilities, specifically for older people, across a wider area than if no modification was made, potentially meeting more needs locally which impacts positively on this SA objective. 		

<p>4. Provide access to meet people's needs with least damage to communities and the environment</p> <p>4.1 Increase choice of method of travel</p> <p>4.2 Reduce the need/desire to travel by air</p> <p>4.3 Help everyone access basic services easily, safely and affordably</p> <p>4.4 Make public transport, cycling and walking easier and more attractive</p> <p>4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> • SA Objective not relevant to proposed modifications. 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications. 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications. 		

Appraisal Matrices

Policy CS21 – Gypsy & Traveller accommodation

Scoring system:

√√ = Major positive effect

√ = Positive effect

x = Negative effect

xx = Major negative effect

o = not applicable

? = Effect unknown/depends on implementation of policy

√/x = Both positive and negative effects

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	x	√
<p>Comments:</p> <ul style="list-style-type: none"> The Inspector's modification within the new neighbourhood policies (CS26, CS27, CS31) to the 'potential provision' of new Gypsy & Traveller pitches rather than 'requiring' Gypsy & Traveller pitches weakens the commitment to providing Gypsy & Traveller accommodation in the new neighbourhoods. Reference to the provision for new Gypsy/Traveller sites within the new neighbourhoods however still remains in Policy CS21 although it is considered that the re-wording of the policy has resulted in the policy being weakened. It is therefore considered that the Inspector's modifications to Policy CS21, together with the revisions to the wording in the new neighbourhood policies, have a negative impact on this SA objective, for example by limiting their ability to access health services/facilities and improving their well-being. However, ensuring that a robust evidence base to determine need for pitches is formulated could help to ensure that need in the district can be met. 		

<p>2. Support communities that meet people's needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p style="text-align: center;">X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">√</p>
<p>Comments:</p> <ul style="list-style-type: none"> The Inspector's modification within the new neighbourhood policies (CS26, CS27, CS31) to the 'potential provision' of new Gypsy & Traveller pitches rather than 'requiring' Gypsy & Traveller pitches weakens the commitment to providing Gypsy & Traveller accommodation in the new neighbourhoods. Reference to the provision for new Gypsy/Traveller sites within the new neighbourhoods however still remains in Policy CS21 although it is considered that the re-wording of the policy has resulted in the policy being weakened. It is therefore considered that the Inspector's modifications to Policy CS21, together with the revisions to the wording in the new neighbourhood policies, have a negative impact on this SA objective, in potentially restricting the availability of new residential Gypsy/Traveller pitches and therefore not supporting the creation of inclusive, mixed and balanced communities. However, ensuring that a robust evidence base to determine need for pitches is formulated could help to ensure that need in the district can be met. 		

<p>3. Develop the economy in ways that meet people's needs</p> <p>3.1 Give everyone access to satisfying work opportunities, paid or unpaid</p> <p>3.2 Help everyone afford a comfortable standard of living</p> <p>3.3 Reduce poverty and income inequality</p> <p>3.4 Meet needs locally</p> <p>3.5 Increase the circulation of wealth within the region</p> <p>3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>Proposed Modification</p> <p style="text-align: center;">X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • The Inspector's modification within the new neighbourhood policies (CS26, CS27, CS31) to the 'potential provision' of new Gypsy & Traveller pitches rather than 'requiring' Gypsy & Traveller pitches weakens the commitment to providing Gypsy & Traveller accommodation in the new neighbourhoods. Reference to the provision for new Gypsy/Traveller sites within the new neighbourhoods however still remains in Policy CS21 although it is considered that the re-wording of the policy has resulted in the policy being weakened. • It is therefore considered that the Inspector's modifications to Policy CS21, together with the revisions to the wording in the new neighbourhood policies have a negative impact on this SA objective, for example in preventing local work opportunities for the Gypsy/Traveller community, access to existing local businesses/employment. • However, ensuring that a robust evidence base to determine need for pitches is formulated could help to ensure that need in the district can be met. 		

<p>4. Provide access to meet people’s needs with least damage to communities and the environment</p> <p>4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>Proposed Modification</p> <p>X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • The Inspector’s modification within the new neighbourhood policies (CS26, CS27, CS31) to the ‘potential provision’ of new Gypsy & Traveller pitches rather than ‘requiring’ Gypsy & Traveller pitches weakens the commitment to providing Gypsy & Traveller accommodation in the new neighbourhoods. Reference to the provision for new Gypsy/Traveller sites within the new neighbourhoods however still remains in Policy CS21 although it is considered that the re-wording of the policy has resulted in the policy being weakened. • It is therefore considered that the Inspector’s modifications to Policy CS21, together with the revisions to the wording in the new neighbourhood policies have a negative impact on this SA objective, by restricting the provision of new sites in sustainable areas with good access to local services and facilities and improved availability of public transport options. • However, ensuring that a robust evidence base to determine need for pitches is formulated could help to ensure that need in the district can be met. 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p style="text-align: center;">X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • The potential reduction of pitch provision in sustainable locations such as the New Neighbourhoods may increase pressure for Gypsy/Traveller sites in Green Belt and open countryside locations. • However, ensuring that a robust evidence base to determine need for pitches is formulated could help to ensure that need in the district can be met. 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p style="text-align: center;">O</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">O</p>
<p>Comments:</p> <ul style="list-style-type: none"> • SA Objective not relevant to proposed modifications. 		

Appraisal Matrices Policy CS26 – Cribbs/Patchway new neighbourhood

Scoring system:

√√ = Major positive effect xx = Major negative effect ? = Effect unknown/depends on implementation of policy
√ = Positive effect o = not applicable √/x = Both positive and negative effects
x = Negative effect

Context:

The Inspector's Matter 22 Question 5 asked if the complexity of policy CS26 could be reduced. Through responding to this question the Council sought to reduce the complexity of the policy but retain the emphasis of ensuring a comprehensive and cohesive plan-led approach is taken to development, in order to deliver sustainable communities. It was considered this approach and the subsequent re-wording of the new neighbourhood policy is equally applicable to the other New Neighbourhoods at East of Harry Stoke and at North Yate.

This modification seeks to ensure that development is comprehensively planned, and delivery coordinated and phased through the production of an SPD, unless the development partners deliver a co-ordinated masterplan and agree financial and land value cost of on-site provision that together integrate the design and the delivery of the required infrastructure across all sites within the new Neighbourhood area. The need for this modification is to ensure that full integration between the different land ownerships, land uses and the provision of all services, facilities, associated infrastructure and utilities, both within and beyond the allocation is achieved. The December 2011 Core Strategy version of the policy was less explicit about how this was to be achieved.

This modification will seek to prevent a sub-optimal planning application on part of the new neighbourhood, which would fail to deliver the Core Strategy policy requirements, or place a disproportionate requirement upon the remainder of the allocation for the Cribbs/Patchway New Neighbourhood. It is considered that the modification will ensure that the comprehensive and coordinated delivery of all aspects of the policy will be achieved.

The draft modification made to the clause regarding Gypsy/Traveller pitch provision is however considered to negatively impact on sustainability objectives as it weakens the commitment to pitch delivery and therefore the creation of mixed and balanced communities. The modification regarding the transformation of the Mall/Cribbs Causeway is also considered to have negative sustainability impacts on Policy CS26. The Council has a clear vision for Cribbs/Patchway, founded on the key principles of improving the diversity, integration and connectivity of Cribbs/Patchway in its own right and with adjoining communities. Given the scale of development proposed through Policy CS26 as amended by the Inspector, it is essential that this key place making component of the policy is maintained in order to maximise positive sustainability impacts.

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	√√/x	?/√
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to plan and deliver comprehensive development may harm the co-ordinated delivery of adequate health care provision and reduce the opportunity to promote healthy lifestyles within the new neighbourhood. The proposed modifications make explicit the requirement for coordinated delivery of infrastructure to meet the needs arising from the development to ensure that sustainable development is achieved. • The deletion of reference to the transformation of Cribbs Causeway into a sustainable mixed use centre is considered to have a negative impact on this SA objective by limiting the opportunity to locate facilities in locations accessible by sustainable modes of transport, which would promote healthy lifestyles including route daily exercise. • It is considered that the Inspector’s modifications to the wording of the Gypsy/Traveller pitch provision clause has a negative impact on this SA objective, for example by limiting their ability to access health services/facilities and improving their well-being. 		

<p>2. Support communities that meet people's needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p>√√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) ?/√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to plan and deliver comprehensive development may harm the co-ordinated delivery of adequate education, cultural and community facilities, infrastructure and housing choice to accommodate the broadest needs of the community, which would impact on this SA objective. The proposed modifications make explicit the requirement for comprehensively planned and coordinated delivery of infrastructure to meet the needs arising from the development to ensure that a well integrated and sustainable development is achieved. • The deletion of reference to the transformation of Cribbs Causeway into a sustainable mixed use centre is considered to have a negative impact on this SA objective by reducing the opportunity to locate new services and facilities close to new and existing residents, workers and visitors. • It is considered that the Inspector's modifications to the wording of the Gypsy/Traveller pitch provision clause has a negative impact on this SA objective, in potentially restricting the availability of new residential Gypsy/Traveller pitches and therefore not supporting the creation of inclusive, mixed and balanced communities. 		

<p>3. Develop the economy in ways that meet people's needs</p> <p>3.1 Give everyone access to satisfying work opportunities, paid or unpaid</p> <p>3.2 Help everyone afford a comfortable standard of living</p> <p>3.3 Reduce poverty and income inequality</p> <p>3.4 Meet needs locally</p> <p>3.5 Increase the circulation of wealth within the region</p> <p>3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>Proposed Modification</p> <p>√√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>?/√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to ensure the delivery of the full range of uses, including those that will provide employment opportunities, would impact on this SA objective. The proposed modifications make explicit the requirement for comprehensively planned and coordinated delivery of infrastructure to meet the needs arising from the development to ensure that a well integrated and sustainable development is achieved. • The deletion of reference to the transformation of Cribbs Causeway into a sustainable mixed use centre is considered to have a negative impact on this SA objective by reducing the ability of development meet needs locally, and reducing the potential to circulate wealth locally. • It is considered that the Inspector's modifications to the wording of the Gypsy/Traveller pitch provision clause has a negative impact on this SA objective, for example in preventing local work opportunities for the Gypsy/Traveller community, access to existing local businesses/employment. 		

<p>4. Provide access to meet people's needs with least damage to communities and the environment</p> <p>4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>Proposed Modification</p> <p>√√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) ?/√</p>
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Comments:

- Failure to ensure the comprehensive and co-ordinated delivery of the transport measures set out in the policy, including the adequate provision of public transport, walking and cycling opportunities to key destinations both within the New Neighbourhood and in the surrounding area, would impact on this SA objective. The proposed modifications make explicit the requirement for comprehensively planned and coordinated delivery of infrastructure to meet the needs arising from the development to ensure that sustainable development is achieved.
- The deletion of reference to the transformation of Cribbs Causeway into a sustainable mixed use centre is considered to have a negative impact on this SA objective by limiting the opportunity to locate facilities in locations accessible by sustainable modes of transport, particularly making walking and cycling easier and more attractive.
- It is considered that the Inspector's modifications to the wording of the Gypsy/Traveller pitch provision clause has a negative impact on this SA objective, by restricting the provision of new sites in sustainable areas with good access to local services and facilities and improved availability of public transport options.

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p>√/0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>?</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to ensure the comprehensively planned and co-ordinated delivery of the range of Green Infrastructure set out in the policy, including the provision, protection and enhancement of landscape features, biodiversity and amenity assets, would impact on this SA objective. The proposed modifications make explicit the requirement for coordinated delivery of infrastructure to meet the needs arising from the development to ensure that sustainable development is achieved. • The modification to the transformation of Cribbs Causeway is not relevant to this objective. • The modifications to the Gypsy/Traveller pitch provision clause and the clause relating to transforming Cribbs Causeway into a sustainable mixed use centre are not relevant to this SA objective. 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and ‘greenhouse’ emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p>√√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) ?</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to ensure the comprehensive and integrated delivery of utilities and energy infrastructure, including the provision of appropriate SUDs, would impact on this SA objective. The proposed modification makes explicit the requirement for coordinated delivery of infrastructure to meet the needs arising from the development to ensure that sustainable development is achieved. • The modifications to the Gypsy/Traveller pitch provision clause and the clause relating to transforming Cribbs Causeway into a sustainable mixed use centre are not relevant to this SA objective. • The deletion of reference to the transformation of Cribbs Causeway into a sustainable mixed use centre is considered to have a negative impact on this SA objective by limiting the opportunity to locate facilities in locations accessible by sustainable modes of transport, thereby encouraging car use and associated greenhouse emissions. 		

Appraisal Matrices Policy CS27 – East of Harry Stoke new neighbourhood

Scoring system:

√√ = Major positive effect xx = Major negative effect ? = Effect unknown/depends on implementation of policy
√ = Positive effect o = not applicable √/x = Both positive and negative effects
x = Negative effect

Context:

The Inspector's Matter 22 Question 5 asked if the complexity of policy CS26 could be reduced. Through responding to this question the Council sought to reduce the complexity of the policy but retain the emphasis of ensuring a comprehensive and cohesive plan-led approach is taken to development, in order to deliver sustainable communities. It was considered this approach and the subsequent re-wording of the new neighbourhood policy is equally applicable to the other New Neighbourhoods at East of Harry Stoke and at North Yate.

This modification seeks to ensure that development is comprehensively planned, and delivery coordinated and phased through the production of an SPD, unless the development partners deliver a co-ordinated masterplan and agree financial and land value cost of on-site provision that together integrate the design and the delivery of the required infrastructure across all sites within the new Neighbourhood area. The need for this modification is to ensure that full integration between the different land ownerships, land uses and the provision of all services, facilities, associated infrastructure and utilities, both within and beyond the allocation is achieved. The December 2011 Core Strategy version of the policy was less explicit about how this was to be achieved.

This modification will seek to prevent a sub-optimal planning application on part of the new neighbourhood, which would fail to deliver the Core Strategy policy requirements, or place a disproportionate requirement upon the remainder of the allocation for the East of Harry Stoke New Neighbourhood. It is considered that the modification will ensure that the comprehensive and coordinated delivery of all aspects of the policy will be achieved.

The draft modification made to the clause regarding Gypsy/Traveller pitch provision is however considered to negatively impact on sustainability objectives.

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	√√/x	?/√
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to plan and deliver comprehensive development within the new neighbourhood may result in sub optimal health care provision and reduce the opportunity to promote healthy lifestyles within the new neighbourhood. The proposed modification makes explicit the requirement for coordinated delivery of infrastructure to meet the needs arising from the development to ensure that sustainable development is achieved. • It is considered that the Inspector's modifications to the wording of the Gypsy/Traveller pitch provision clause has a negative impact on this SA objective, for example by limiting their ability to access health services/facilities and improving their well-being. 		

<p>2. Support communities that meet people's needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p>√√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) ?/√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to plan and deliver comprehensive development may harm the co-ordinated delivery of adequate education, cultural and community facilities, infrastructure and housing choice to accommodate the broadest needs of the community, which would impact on this SA objective. The proposed modifications make explicit the requirement for comprehensively planned and coordinated delivery of infrastructure to meet the needs arising from the development to ensure that a well integrated and sustainable development is achieved. • It is considered that the Inspector's modifications to the wording of the Gypsy/Traveller pitch provision clause has a negative impact on this SA objective, in potentially restricting the availability of new residential Gypsy/Traveller pitches and therefore not supporting the creation of inclusive, mixed and balanced communities. 		

<p>3. Develop the economy in ways that meet people's needs</p> <p>3.1 Give everyone access to satisfying work opportunities, paid or unpaid</p> <p>3.2 Help everyone afford a comfortable standard of living</p> <p>3.3 Reduce poverty and income inequality</p> <p>3.4 Meet needs locally</p> <p>3.5 Increase the circulation of wealth within the region</p> <p>3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>Proposed Modification</p> <p>√√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>?/√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to ensure the delivery of the range of uses, including those that will provide employment opportunities, would impact on this SA objective. The proposed modifications make explicit the requirement for comprehensively planned and coordinated delivery of infrastructure to meet the needs arising from the development to ensure that a well integrated and sustainable development is achieved. • It is considered that the Inspector's modifications to the wording of the Gypsy/Traveller pitch provision clause has a negative impact on this SA objective, for example in preventing local work opportunities for the Gypsy/Traveller community, access to existing local businesses/employment. 		

<p>4. Provide access to meet people's needs with least damage to communities and the environment</p> <p>4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>Proposed Modification</p> <p>√√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>?/√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to ensure the comprehensive and co-ordinated delivery of the transport measures set out in the policy, including the adequate provision of public transport, walking and cycling opportunities, would impact on this SA objective. The proposed modifications make explicit the requirement for comprehensively planned and coordinated delivery of infrastructure to meet the needs arising from the development to ensure that a well integrated and sustainable development is achieved. • It is considered that the Inspector's modifications to the wording of the Gypsy/Traveller pitch provision clause has a negative impact on this SA objective, by restricting the provision of new sites in sustainable areas with good access to local services and facilities and improved availability of public transport options. 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p>√√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>?</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to ensure the comprehensively planned and co-ordinated delivery of the range of Green Infrastructure set out in the policy, including the provision, protection and enhancement of landscape features, biodiversity and amenity assets, would impact on this SA objective. The proposed modifications make explicit the requirement for coordinated delivery of infrastructure to meet the needs arising from the development to ensure that sustainable development is achieved. • The modification to the Gypsy/Traveller pitch provision clause is not relevant to this SA objective. 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p>√√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>?</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to ensure the comprehensive and integrated delivery of utilities and energy infrastructure, including the provision of appropriate SUDs, would impact on this SA objective. The proposed modification makes explicit the requirement for coordinated delivery of infrastructure to meet the needs arising from the development to ensure that sustainable development is achieved. • The modification to the Gypsy/Traveller pitch provision clause is not relevant to this SA objective. 		

Appraisal Matrices

Policy CS31 North Yate New Neighbourhood

Scoring system:

√√ = Major positive effect

xx = Major negative effect

? = Effect unknown/depends on implementation of policy

√ = Positive effect

o = not applicable

√/x = Both positive and negative effects

x = Negative effect

Context:

The Inspector's Matter 22 Question 5 asked if the complexity of policy CS26 could be reduced. Through responding to this question the Council sought to reduce the complexity of the policy but retain the emphasis of ensuring a comprehensive and cohesive plan-led approach is taken to development, in order to deliver sustainable communities. It was considered this approach and the subsequent re-wording of the new neighbourhood policy is equally applicable to the other New Neighbourhoods at East of Harry Stoke and at North Yate.

Through discussions at the Matter 21 Hearing Session (Yate and Chipping Sodbury) it was agreed that further modifications would be prepared for the North Yate New Neighbourhood Policy (CS31). This modification seeks to ensure that development is comprehensively planned, and delivery coordinated and phased through the production of an SPD, unless the development partners deliver a co-ordinated masterplan and agree financial and land value cost of on-site provision that together integrate the design and the delivery of the required infrastructure across all sites within the North Yate new Neighbourhood area. The need for this modification is to ensure that full integration between the different land ownerships, land uses and the provision of all services, facilities, associated infrastructure and utilities, both within and beyond the allocation is achieved. The December 2011 Core Strategy version of the policy was less explicit about how this was to be achieved.

This modification has also been sought in the context of one of the development partners promoting a sub-optimal planning application on part of the new neighbourhood, which would fail to deliver (or places a disproportionate requirement upon the remainder of the allocation) the Core Strategy policy requirements for the North Yate New Neighbourhood. It is considered that the modification will ensure that the comprehensive and coordinated delivery of all aspects of the policy will be achieved.

The draft modification made to the clause regarding Gypsy/Traveller pitch provision is however considered to negatively impact on sustainability objectives.

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	√√/x	?/√
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to plan and deliver comprehensive development within the new neighbourhood may result in sub optimal health care provision and reduce the opportunity to promote healthy lifestyles within the new neighbourhood. The proposed modification makes explicit the requirement for coordinated delivery of infrastructure to meet the needs arising from the development to ensure that sustainable development is achieved. • It is considered that the Inspector's modifications to the wording of the Gypsy/Traveller pitch provision clause has a negative impact on this SA objective, for example by limiting their ability to access health services/facilities and improving their well-being. 		

<p>2. Support communities that meet people's needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p>√√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>?/√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to plan and deliver comprehensive development may harm the co-ordinated delivery of adequate education provision, community meeting space and contributions to extend the library services, such as those proposed in the multi-use facility in the new centre and through an extension to the existing Yate Library respectively, would impact on this SA objective. The proposed modification makes explicit the requirement for coordinated delivery of infrastructure to meet the needs arising from the development to ensure that sustainable development is achieved. • It is considered that the Inspector's modifications to the wording of the Gypsy/Traveller pitch provision clause has a negative impact on this SA objective, in potentially restricting the availability of new residential Gypsy/Traveller pitches and therefore not supporting the creation of inclusive, mixed and balanced communities. 		

<p>3. Develop the economy in ways that meet people's needs</p> <p>3.1 Give everyone access to satisfying work opportunities, paid or unpaid</p> <p>3.2 Help everyone afford a comfortable standard of living</p> <p>3.3 Reduce poverty and income inequality</p> <p>3.4 Meet needs locally</p> <p>3.5 Increase the circulation of wealth within the region</p> <p>3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>Proposed Modification</p> <p style="text-align: center;">√√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">?/√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to ensure the delivery of the full range of uses on site, including those that will provide employment opportunities, would impact on this SA objective. The proposed modification makes explicit the requirement for comprehensively planned and coordinated delivery of infrastructure to meet the needs arising from the development to ensure that a well integrated and sustainable development is achieved. • It is considered that the Inspector's modifications to the wording of the Gypsy/Traveller pitch provision clause has a negative impact on this SA objective, for example in preventing local work opportunities for the Gypsy/Traveller community, access to existing local businesses/employment. 		

<p>4. Provide access to meet people's needs with least damage to communities and the environment</p> <p>4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>Proposed Modification</p> <p style="text-align: center;">√/x</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">?/√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to ensure the comprehensive and co-ordinated delivery of the transport measures set out in the policy, including the adequate provision of public transport, walking and cycling opportunities, would impact on this SA objective. The proposed modification makes explicit the requirement for coordinated delivery of infrastructure to meet the needs arising from the development to ensure that a well integrated and sustainable development is achieved. • It is considered that the Inspector's modifications to the wording of the Gypsy/Traveller pitch provision clause has a negative impact on this SA objective, by restricting the provision of new sites in sustainable areas with good access to local services and facilities and improved availability of public transport options. 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p style="text-align: center;">√√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">?</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to ensure the comprehensive planning and co-ordinated delivery of the range of Green Infrastructure set out in the policy, including the provision, protection and enhancement of landscape features, biodiversity and amenity assets, would impact on this SA objective. The proposed modification makes explicit the requirement for coordinated delivery of infrastructure to meet the needs arising from the development to ensure that sustainable development is achieved. • The modification to the Gypsy/Traveller pitch provision clause is not relevant to this SA objective. 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and ‘greenhouse’ emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p style="text-align: center;">√√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">?</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Failure to ensure the comprehensive and integrated delivery of utilities and energy infrastructure, including the provision of appropriate SUDs, would impact on this SA objective. The proposed modification makes explicit the requirement for coordinated delivery of infrastructure to meet the needs arising from the development to ensure that sustainable development is achieved. • The modification to the Gypsy/Traveller pitch provision clause is not relevant to this SA objective. 		

Appraisal Matrices

Policy CS35 Severnside

Scoring system:

√√ = Major positive effect

xx = Major negative effect

? = Effect unknown/depends on implementation of policy

√ = Positive effect

o = not applicable

√/x = Both positive and negative effects

x = Negative effect

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	o	o
Comments: <ul style="list-style-type: none"> SA Objective not relevant to proposed modification 		

<p>2. Support communities that meet people's needs 2.1 Help make suitable housing available and affordable for everyone 2.2 Give everyone access to learning, training, skills and knowledge 2.3 Reduce crime and fear of crime 2.4 Promote stronger and more vibrant communities 2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p>0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modification 		

<p>3. Develop the economy in ways that meet people's needs 3.1 Give everyone access to satisfying work opportunities, paid or unpaid 3.2 Help everyone afford a comfortable standard of living 3.3 Reduce poverty and income inequality 3.4 Meet needs locally 3.5 Increase the circulation of wealth within the region 3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>Proposed Modification</p> <p>x√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>x√</p>
<p>Comments:</p> <ul style="list-style-type: none"> As a regionally significant employment area, Severnside scores well against objective 3.1. Further economic development at Severnside without the successful implementation of a mitigation strategy to address flood risk would have severe negative implications for the sustainability of the area The proposed modification reflects the current multi-agency approach to delivering a strategic solution to flood risk and is, therefore, potentially more positive than the submission policy, which recognised the problem but not the means to address it. 		

<p>4. Provide access to meet people’s needs with least damage to communities and the environment</p> <p>4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>Proposed Modification</p> <p style="text-align: center;">?</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">X</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Policy relates to the building out of extant planning consents for major employment development dating from 1957/58 for warehousing and other extensive land uses. Therefore the opportunity to influence this SA objective is extremely limited. Further development will increase overall traffic levels in the area • Commuting distances and the nature of the employment acceptable at Severnside due to flood risk (ie. non-labour intensive and shift based) limit the opportunities to make a positive contribution to SA Objective 4.4 • The proposed modification recognises current multi-agency commitment to delivering a new junction on the M49 motorway. This may result in less damage to local communities from heavy goods traffic. 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p style="text-align: center;">x√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">X</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Policy relates to the building out of extant planning consents for major employment development dating from 1957/58 for warehousing and other extensive land uses which can proceed without mitigation of environmental constraints. There are significant environmental constraints in the area in respect of flood risk, biodiversity and archaeology • Extensive nature of employment activities results in large land take – contrary to SA Objective 5.2 • The proposed modification reflects the current multi-agency approach to delivering a strategic solution to mitigate the various environmental constraints and is, therefore, potentially more positive than the submission policy, which recognised the problem but not the means to address it. 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p>x√</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>X</p>
<p>Comments:</p> <ul style="list-style-type: none"> • Policy relates to the building out of extant planning consents for major employment development dating from 1957/58 for warehousing and other extensive land uses. Access to the area is by road, so scores negatively against SA Objective 6.1 • Proposed modification recognises opportunity for energy generation in the area, so this would score positively against SA Objective 6.1 if this involved renewable energy. Delivery of an energy grid is also encouraged. 		

Appraisal Matrices

Policy CS37 – Nuclear related development

Scoring system:

√√ = Major positive effect

xx = Major negative effect

? = Effect unknown/depends on implementation of policy

√ = Positive effect

o = not applicable

√/x = Both positive and negative effects

x = Negative effect

SA Objectives	Proposed Modifications (Policy and supporting text)	No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)
1. Improve health 1.1 Improve health 1.2 Reduce health Inequalities 1.3 Promote healthy lifestyles, especially routine daily exercise	x	√
<p>Comments:</p> <ul style="list-style-type: none"> The Inspector’s modification to Policy CS37, criteria 13 and supporting paragraph at 18.23a preferring community benefit to be ‘sought’ rather than ‘provided by the developer’, weakens the policy commitment to ensure community benefits are gained. This negatively impacts on this SA objective for example in improving existing health facilities or the opportunity to provide new health or leisure facilities in the area to promote and improve healthy lifestyles of the local community. 		

<p>2. Support communities that meet people's needs</p> <p>2.1 Help make suitable housing available and affordable for everyone</p> <p>2.2 Give everyone access to learning, training, skills and knowledge</p> <p>2.3 Reduce crime and fear of crime</p> <p>2.4 Promote stronger and more vibrant communities</p> <p>2.5 Increase access to and participation in cultural activities</p>	<p>Proposed Modification</p> <p>X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>√</p>
<p>Comments:</p> <ul style="list-style-type: none"> • The Inspector's modification to Policy CS37, criteria 13 and supporting paragraph at 18.23a preferring community benefit to be 'sought' rather than 'provided by the developer', weakens the policy commitment to ensure community benefits are gained, thereby negatively impacting on this SA objective. • A community benefit fund could be used to improve or fund new development for accommodation, education and training/employment to contribute to an overall balance of positive outcomes for the local communities. 		

<p>3. Develop the economy in ways that meet people's needs</p> <p>3.1 Give everyone access to satisfying work opportunities, paid or unpaid</p> <p>3.2 Help everyone afford a comfortable standard of living</p> <p>3.3 Reduce poverty and income inequality</p> <p>3.4 Meet needs locally</p> <p>3.5 Increase the circulation of wealth within the region</p> <p>3.6 Reduce vulnerability of the economy to climate change and harness opportunities arising</p>	<p>Proposed Modification</p> <p style="text-align: center;">X</p>	<p>No Modification ((position as in Submission Core Strategy incorporating December 2011 Post-Submission changes) ✓</p>
<p>Comments:</p> <ul style="list-style-type: none"> The Inspector's modification to Policy CS37, criteria 13 and supporting paragraph at 18.23a preferring community benefit to be 'sought' rather than 'provided by the developer', weakens the policy commitment to ensure community benefits are gained for example in providing local economic benefits by way of employment, education and training opportunities, thereby negatively impacting on this SA objective. 		

<p>4. Provide access to meet people’s needs with least damage to communities and the environment</p> <p>4.1 Increase choice of method of travel 4.2 Reduce the need/desire to travel by air 4.3 Help everyone access basic services easily, safely and affordably 4.4 Make public transport, cycling and walking easier and more attractive 4.5 Encourage a switch from transporting freight by road to rail or water.</p>	<p>Proposed Modification</p> <p>X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p>√</p>
<p>Comments:</p> <ul style="list-style-type: none"> The Inspector’s modification to Policy CS37, criteria 13 and supporting paragraph at 18.23a preferring community benefit to be ‘sought’ rather than ‘provided by the developer’, weakens the policy commitment to ensure community benefits are gained which could be used for improving accessibility in the local community such as increasing opportunities for cycling/walking and associated incentive schemes, or improving the availability if needed, of improved public transport options for example, thereby negatively impacting on this SA objective. 		

<p>5. Maintain and improve environmental quality and assets</p> <p>5.1 Protect and enhance habitats and species (taking account of climate change)</p> <p>5.2 Promote the conservation and wise use of land</p> <p>5.3 Protect and enhance landscape and townscape</p> <p>5.4 Value and protect diversity and local distinctiveness including rural ways of life</p> <p>5.5 Maintain and enhance cultural and historical assets</p> <p>5.6 Reduce vulnerability to flooding and sea level rise (taking account of climate change)</p>	<p>Proposed Modification</p> <p style="text-align: center;">X</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">√</p>
<p>Comments:</p> <ul style="list-style-type: none"> The Inspector's modification to Policy CS37, criteria 13 and supporting paragraph at 18.23a preferring community benefit to be 'sought' rather than 'provided by the developer', weakens the policy commitment to ensure community benefits are gained and used towards the protection of the local landscape and cultural/heritage assets, as well as enhancement of these assets where possible, thereby negatively impacting on this SA objective. 		

<p>6. Minimise consumption of natural resources</p> <p>6.1 Reduce non-renewable energy consumption and 'greenhouse' emissions</p> <p>6.2 Keep water consumption within local carrying capacity limits (taking account of climate change)</p> <p>6.3 Minimise consumption and extraction of minerals</p> <p>6.4 Reduce waste not put to any use</p> <p>6.5 Minimise land, water, air, light and generic pollution</p>	<p>Proposed Modification</p> <p style="text-align: center;">0</p>	<p>No Modification (position as in Submission Core Strategy incorporating December 2011 Post-Submission changes)</p> <p style="text-align: center;">0</p>
<p>Comments:</p> <ul style="list-style-type: none"> SA Objective not relevant to proposed modifications. 		

Appendix 2 – Habitats Regulations Assessment addendum

European Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna (known as the 'Habitats Directive') provides legal protection for habitats and species identified as being of European importance. Article 2 of the Directive requires the maintenance or restoration of these habitats and species, in a favourable condition, and is achieved through the establishment and maintenance of protected areas referred to as Natura 2000 (N2K) sites, comprised of Special Areas of Conservation (SAC) and Special Protection Areas (SPA). Sites designated as wetlands of international importance under the Ramsar Convention are subject to the same provisions as Natura 2000 sites.

Article 6(3) of the Directive requires any 'plan or project' likely to have a significant effect on a Natura 2000 site be subject to 'appropriate assessment'. This means an assessment of the impacts of the plan/project on the site. As 'plans', the Regulations require Local Authorities to carry out an appropriate assessment (Habitats Regulations Assessment or HRA) of local development documents before being adopted. The purpose of the assessment is to assess the impacts of a land-use plan against the conservation objectives of Natura 2000 Sites.

South Gloucestershire Council published the HRA of the Submission Draft Core Strategy in March 2011. Following an initial screening process, the HRA identified that the Core Strategy proposals had the potential to significantly affect three N2K Sites – the Severn Estuary SAC/SPA/Ramsar; Chew Valley Lake SPA; and Avon Valley Woodlands SAC. However, following an analysis of the likely impacts arising from individual policies, it determined that the Core Strategy was not likely to have any significant adverse effects. Natural England indicated their concurrence with these conclusions and that they regarded the HRA 'fit for purpose' by letters dated 7 April and 8 December 2011.

The Inspector's Main Modifications do not introduce new development allocations nor do they alter development proposals contained in the December 2011 Core Strategy incorporating Post-Submission Changes. Nor do the modifications alter any other policies in such a way as would have implications for the conservation objectives and favourable status of any of the Natura 2000 sites identified in the HRA of the Core Strategy. It is therefore considered that the Inspector's Draft Main Modifications do not alter the findings of the March 2011 HRA.

Appendix 3: EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA)

Name of Function under consideration:	South Gloucestershire Local Plan: Core Strategy 2006-2027
Is this Function 'Major', 'Minor yet likely to have a major impact' or 'Neither'	Major
Date(s) of completing the EqIAA:	September 2012
Name and job title(s) of person(s) completing the EqIAA:	Ben McGee, Planning Officer

SECTION 1 – INTRODUCTORY INFORMATION

1. What is the main purpose of the Function?

The South Gloucestershire Core Strategy will be the key document in the Council's Local Plan and applies to the entire district of South Gloucestershire. It sets out a vision for the area based on evidence, community objectives and the detailed spatial strategy for future development in South Gloucestershire to 2027. It includes policies and programmes for the general location of new development, its type and scale, and the resources to deliver it, as well as protecting what is valued about the area.

2. List the main activities of the Function:

The Core Strategy contains policies related to the following themes:

- Responding to Climate Change and High Quality Design;
- Managing Future Development;
- Tackling Congestion and Improving Accessibility;
- Managing the Environment and Heritage;
- Maintaining Economic Prosperity; and
- Providing Housing and Community Infrastructure.

It also contains policies that will guide future investment and other plans, policies and programmes to achieve strong and prosperous sustainable communities in each of the six spatial areas of the district. The six spatial areas are:

- Communities of the North Fringe of Bristol urban area;
- Communities of the East Fringe of Bristol urban area;
- Yate/Chipping Sodbury;
- Thornbury;
- Rural Areas; and
- Severnside.

3. Who are the main beneficiaries of the Function?

- Residents of South Gloucestershire and wider area.
- Visitors to South Gloucestershire.
- Applicants (including residents) preparing and making applications for development within/affecting South Gloucestershire.
- Professional agents submitting proposals for development within/affecting South Gloucestershire.
- The Council in undertaking development within and affecting South Gloucestershire.
- Officers and Members of the Council in determining applications for development within/affecting South Gloucestershire.

4. How is the overall success of the Function measured?

- The preparation and adoption of the Core Strategy in accordance with the Planning & Compulsory Purchase Act 2004 and the Localism Act 2011.
- The Core Strategy serving as a useful and helpful tool for preparing proposals for development within or affecting South Gloucestershire.
- The Core Strategy serving as a useful and helpful tool in the Local Planning Authority's determination of proposals for development within South Gloucestershire.
- The Council's Annual Monitoring Report measures the success and implementation of the Council's Local Plan documents.

5. What equality monitoring systems are in place to carry out regular checks on the effects of the Function on equality groups?

No disproportionate positive or negative impacts in respect of equality groups have been identified to date. Notwithstanding this, the Council's Annual Monitoring Report measures the success and implementation of the Council's Local Plan documents. Customer satisfaction surveys are also carried out on planning policy functions as part of which equalities questions are asked.

6. What are your equality related performance indicators/measure of success for this Function?

The preparation and adoption of the Core Strategy is carried out in accordance with:

- The preparation and adoption of the Core Strategy in accordance with the Planning & Compulsory Purchase Act 2004 and the Localism Act 2011 and their associated regulations;
- South Gloucestershire Council's Statement of Community Involvement (available on the Council's website at <http://www.southglos.gov.uk/Pages/Article%20Pages/Planning%20Transport%20-%20Strategic%20Environment/Planning%20policy/Local-Development-Framework-documents.aspx?resource=http%3a%2f%2fwww.southglos.gov.uk%2fDocuments%2fPTE080288.pdf>) which contains specific guidance and information in relation to the involvement of equalities communities.
- South Gloucestershire Council's Corporate Consultation Framework which includes "Customer Insight" equalities guidance;
- The South Gloucestershire Council Plan; and
- The South Gloucestershire Sustainable Community Strategy;
- The South Gloucestershire Council Equality and Diversity Policy.

SECTION 2 – INITIAL ASSESSMENT OF IMPACT

7. Use the following table to indicate where you think that the Function could have a negative impact on any of the following groups (i.e. it could disadvantage them), where you think that the Function could have a positive impact on any of the groups and contribute to promoting equality of opportunity or improving relations with equality groups, where you think there is no impact or where you are unsure of impact.

Equality Group	Negative Impact	Positive Impact	No Impact	Unsure of Impact	Reason(s)*
Women/Girls	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No disproportionate positive or negative impacts have been identified in respect of these groups. Data pertaining to Core Strategy engagement shows 48% of attendees were Male and 31% Female. The Council's Statement of Community Involvement (SCI) makes clear the Council's commitment to actively seeking the views of all people.
Men/Boys	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Lesbians, gay men & bisexuals	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No disproportionate positive or negative impacts have been identified in respect of these groups. The Council's Statement of Community Involvement (SCI) makes clear the Council's commitment to actively seeking the views of all people.
Transgender people	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No disproportionate positive or negative impacts have been identified in respect of these groups. The Council's Statement of Community Involvement (SCI) makes clear the Council's commitment to actively seeking the views of all people.

White people (including Irish people)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>No disproportionate positive or negative impacts have been identified in respect of these groups. Data pertaining to Core Strategy engagement shows 10% of attendees represented groups other than White British which compares to a 5.8% population figure for South Gloucestershire. This evidences a sound level of involvement by BAME communities generally. The Council's Statement of Community Involvement (SCI) makes clear the Council's commitment to actively seeking the views of all people.</p>
Asian or Asian British people	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Black or Black British people	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
People of mixed heritage	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Chinese people	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
People from other ethnic groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Travellers (gypsy/Roma/Irish heritage)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
					<p>The Core Strategy contains specific policies and proposals relating to the development and safeguarding of Gypsy/Traveller pitches in recognition of their particular residential needs. These needs are being addressed in the same way as other housing needs in the district, in accordance with national planning policy, the policy framework contained within the Core Strategy and the principles of sustainable development. The relative small increase in population that would result from the additional pitches would be unlikely to have a discernible effect other than increasing the population in that</p>

					area. In addition, the Council's Statement of Community Involvement (SCI) makes clear the Council's commitment to actively seeking the views of all people. As such, no disproportionate positive or negative impacts have been identified.
Disabled People:					
Physical impairment, e.g. mobility issues which mean using a wheelchair or crutches.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No disproportionate positive or negative impacts have been identified in respect of these groups. The Council's Statement of Community Involvement (SCI) makes clear the Council's commitment to actively seeking the views of all people.
Sensory impairment, e.g. blind/having a serious visual impairment, deaf/having a serious hearing impairment.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Mental health condition, e.g. depression or schizophrenia.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Learning disability/difficulty, e.g. Down's syndrome or dyslexia, or cognitive impairment such as autistic spectrum disorder.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Long-standing illness or health condition, e.g. cancer, HIV, diabetes, chronic heart disease or epilepsy.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Other health problems or impairments.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Older People	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No disproportionate positive or negative impacts have been identified in respect of these groups. Data pertaining to Core Strategy engagement shows 60% of attendees were between the ages of 25 and 64 years. The Council's Statement of Community Involvement (SCI) makes clear the Council's commitment to
Children and Young People	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

					<p>actively seeking the views of all people.</p> <p>The Core Strategy is a high level and strategic document. This means that many of the impacts of new development on people from diverse age groups continue to be addressed as a result of specific and detailed proposals for development which the Core Strategy does not contain.</p>
Faith Groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No disproportionate positive or negative impacts have been identified in respect of these groups. The Council's Statement of Community Involvement (SCI) makes clear the Council's commitment to actively seeking the views of all people.
Pregnancy & Maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No disproportionate positive or negative impacts have been identified in respect of these groups. The Council's Statement of Community Involvement (SCI) makes clear the Council's commitment to actively seeking the views of all people.
Marriage & Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No disproportionate positive or negative impacts have been identified in respect of these groups. The Council's Statement of Community Involvement (SCI) makes clear the Council's commitment to actively seeking the views of all people.

8. If you have indicated that there is a negative impact on any group, is that impact:

Legal? Yes No

Intended? Yes No

Level of impact High Low

No negative impact has been identified:

9. Could you minimise or remove any negative impact - how? (Enter N/A if no negative impact has been identified).

N/A

10. Could you improve a positive impact of the Function - how? (Enter N/A if no positive impact has been identified).

N/A

11. If there is no evidence that the Function promotes equality of opportunity or improved relations, could it be adapted so that it does - how? (Enter N/A if appropriate).

N/A

12. Any other relevant notes:

N/A

SECTION 3 – CONSULTATION & RESEARCH IN RELATION TO THE EqIAA

13. What consultation has been conducted with groups and individuals from groups likely to be affected as well as staff, and what evidence has this provided about equalities impact?

The Core Strategy has been through multiple rounds of public engagement since its production began in 2007. These public consultations have included exhibitions, workshops and full consultations on draft versions of the document, in accordance with statutory planning procedures. All of the consultation and engagement activities have been well promoted and advertised widely. The consultation and engagement undertaken throughout the Core Strategy's production is documented in a number of reports that are available on the Council's website here:

<http://www.southglos.gov.uk/Pages/Article%20Pages/Planning%20Transport%20-%20Strategic%20Environment/Planning%20policy/Consultation-and-engagement-reports.aspx>

The Council maintains an extensive planning policy consultation database that includes a large number of stakeholder interest groups, including representative groups of disabled people, Gypsy/Traveller groups and other communities including groups representing the South Gloucestershire Equalities Forum. This database is used to contact and inform these groups at each stage of consultation on the Core Strategy.

Public exhibitions and consultation on the South Gloucestershire Core Strategy was undertaken in 2010 and 2011. The following information provides details of those providing feedback in relation to Core Strategy engagement:

Gender

Group	Percentage
Male	48%
Female	31%
Prefer not to say	4%
No Response	17%
	100%

Ethnicity

Group	Percentage
White British	72%
Any other ethnic group	10%
White Irish	0%
No answer	17%
	100%

Age

Group	Percentage
18yrs or under	1%
19-24 yrs	0%
25-44 yrs	15%
45-64 yrs	45%
65-74 yrs	16%
75-84 yrs	2%
>85 yrs	0%
Prefer not to say	4%
No answer	17%

	100%
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14. What relevant research (data, reports, expert opinion etc.) has been conducted and what evidence has this provided about equalities impact?

All rounds of public consultation have provided the opportunity for all members of the public to provide the Council with information about equalities issues. The feedback gained shows no equalities issues or impacts having emerged.

The Core Strategy is a high level and strategic document. This means that many of the impacts of new development on groups such as disabled people and older people continue to be addressed as a result of specific and detailed proposals for development which the Core Strategy does not contain.

15. What contributions does your function/activity make towards promoting community cohesion?

The production of the Core Strategy and its associated public engagement provides the opportunity for the communities of South Gloucestershire to have their say about how the future of the district should be planned for, including what is valued within the area and how it could be maintained or enhanced. The ability to do this provides the opportunity for communities to come together in a cohesive way, to discuss and put forward suggestions together. This enhances the council's work in the promotion of community cohesion.

SECTION 4 – OUTCOMES

16. The evidence that has been collected under Sections 1, 2 and 3 of this form will need to feed into the decision making process regarding changes to be implemented before any final decisions are taken. There are four possible outcomes of this EqIAA – indicate which outcome below with the reasons and justification for this.

Outcome	Your response	Reason(s) and Justification
Outcome 1: No major change required.	Yes <i>(No action plan is required, complete the 'Reason(s)/Justification' column, enter N/A in question 17 then go to Section 5)</i>	Consultation has been successful in engaging with the diverse communities of South Gloucestershire.
Outcome 2: Adjustments to remove barriers or to better promote equality have been identified.	No <i>(Action Plan is required, complete the 'reason(s)/Justification' column and then go to Question 17)</i>	No disproportionate positive or negative impacts in relation to any groups have been identified as a result of this EqIAA.
Outcome 3: Continue despite having identified potential for adverse impact or missed opportunities to promote equality.	No <i>(No action plan is required, complete the 'Reason(s)/Justification' column, enter N/A in question 17 then go to Section 5)</i>	
Outcome 4: Stop and rethink.	No <i>(Action Plan is required, complete the 'Reason(s)/Justification' column and then go to Question 17)</i>	

17. List the actions you will take as a result of this EqIAA.

Consultation will be undertaken on the Inspector Main Modifications and the Sustainability Appraisal in October and November 2012. Responses received will be passed to the Inspector for his consideration while drafting his final report and recommendations to the Council. Once the Council has received these then the Core Strategy can be adopted by the Council.

SECTION 5 – EqIAA EVIDENCE

18. List and attach the evidence you have which shows how you have systematically considered equality impact.

The preparation and adoption of the Core Strategy has been carried out in accordance with:

- South Gloucestershire Council's Statement of Community Involvement which contains specific guidance and information in relation to the involvement of equalities communities.
- South Gloucestershire Council's Corporate Consultation Framework which includes "Customer Insight" equalities guidance;
- The South Gloucestershire Council Plan; and
- The South Gloucestershire Sustainable Community Strategy;
- The South Gloucestershire Council Equality and Diversity Policy.

The results of all public consultation and engagement on the Core Strategy have been analysed with regard to equalities impacts.