

PSM4

**South Gloucestershire
Core Strategy
Examination**

**Position Statement
for
Matter 4:
Sustainability Appraisal**

May 2012

Matter 4 – Sustainability Appraisal

Q1 What deficiencies, if any, exist in the Sustainability Appraisal and how can these be addressed?

Council response – No deficiencies exist in the procedures and processes followed in undertaking the Sustainability Appraisal (SA). The SA process complies with the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and the Strategic Environment Assessment Directive 2001/42/EC.

Publishing of required documents

- 1.1 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 as referenced at page 12 of the December 2011 SA Report:
- i. Local Development Framework Scoping Report March 2008 (Examination Library ref: SD15).
 - ii. Core Strategy Issues and Options Initial Sustainability Appraisal Report (Examination Library ref: SD17 and SD18).
 - iii. Pre-Submission Publication Draft Core Strategy Sustainability Appraisal March 2010 (Examination Library ref: SD6/1 and SD7/1).
 - iv. Core Strategy Sustainability Appraisal March 2010 with December 2010 updates (Examination Library ref: SD6 and SD7).
 - v. Filton Airfield Position Statement Sustainability Appraisal June 2011 (Examination Library ref: SG4/1).
 - vi. Core Strategy Sustainability Appraisal December 2010 with December 2011 updates (Examination Library ref: PS3).
- 1.2 Paragraph 1.16 of the December 2011 SA Report states that these documents together meet the requirements of the Environment Report stipulated by the SEA Regulations. The information and evidence gathered and assessed in each of the documents referred to at 1.1 above has been used to inform each subsequent document as the development of the Core Strategy has progressed. The December 2011 Core Strategy SA Report is therefore a culmination of the necessary environmental, social and economic evidence gathered throughout the preparation of the Core Strategy. It provides a comprehensive assessment of all relevant considerations that have led to the identification of the preferred options, and as such it meets the requirements of the 2004 Regulations and 2001 Directive.
- 1.3 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.

- 1.4 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 taken proper account of the findings of the SA in reaching its preferred options as set out in the December 2011 Core Strategy.

Q2 Is the latest version of the Sustainability Appraisal sufficiently comprehensive in setting out alternative options through all preparatory stages of plan preparation?

Council response – Yes;

- 2.1 The December 2011 Sustainability Appraisal (SA) Report (EiP Library Reference PS3) is the SA Report that supports the Core Strategy which is the subject of the Examination in Public. The Council considers this SA document to be sufficiently comprehensive in the way it has set out alternative options and the way this has been effectively undertaken and documented at each relevant stage in the Core Strategy's preparation.
- 2.2 At paragraphs 1.15a and 1.15b of the December 2011 SA it is confirmed that the SA was first produced for the March 2010 Core Strategy. It was then updated for the December 2010 Core Strategy and finally again for the December 2011 Core Strategy. These successive iterations are evidenced by the strike through of text and new text in bold, made at each respective stage. The Council has also made available the original versions of the respective SAs to the Examination (see Examination Library Refs: SD15, SD17, SD18, SD6/1, SD7/1, SD6 and SD7). In preparing the December 2011 SA the Council has drawn upon earlier evidence set out in the 2008 Initial SA Report (Examination Library reference SD17 and SD18). The December 2011 SA and the SA Scoping Report (EiP Library reference SD15) together contain all necessary and appropriate details/ references to supporting material required for the preparation of the SA. The December 2011 SA Report is a culmination of the necessary environmental, social and economic evidence gathered throughout the preparation of the Core Strategy. It provides a comprehensive assessment of all relevant considerations that have led to the identification of the preferred options, and as such it meets the requirements of the 2004 Regulations and the 2001 Directive.
- 2.3 As stated in the Council's response to question 1, the December 2011 SA report is the culmination of the outcomes of the documents referred to at paragraph 1.1 above.
- 2.4 The December 2011 SA Report does comprehensively set out all of the alternative options considered throughout the preparation of the Core Strategy. In accordance with the 2004 SEA Regulations, the December 2011 SA sets out the consideration of and thereafter gives reasons for the rejection of reasonable alternatives.
- 2.5 The December 2011 SA report is based on the two previous iterations of the SA Report (March and December 2010). Paragraphs 4.2a to 4.2f of the December 2011 SA Report summarise the reasons for rejection of alternative locations for development. The table at paragraph 4.2d provides the reader with the reference to

relevant sections and appendices of all iterations of the SA Report (i.e. March 2010, December 2010 and December 2011). The sections and appendices set out in detail the assessment of alternatives and the reasons for their rejection at the relevant stages of the preparation of the plan.

- 2.6 Paragraphs 4.2a – 4.2f together with the relevant sections and appendices referred to demonstrate that in respect of the rejected sites, the Council has at the appropriate stages in the development of the Core Strategy given reasons for the rejection of the alternatives. It further confirms that the reasons for dismissing the alternative sites remain valid as at December 2011. From the information referenced, particularly within the table at 4.2d, it is evident that the reasons for rejecting alternatives are set out clearly.
- 2.7 Table 1 at Appendix A sets out in tabular form the details and references of the consideration of alternatives and the selection of preferred options as they were considered at each relevant stage of the Core Strategy’s preparation.
- 2.8 Regulation 12(2) of the SEA Regulations requires the SA Report to
- “identify, describe and evaluate the likely significant effects on the environment of –*
- (a) implementing the plan or programme; and*
- (b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.”*
- Schedule 2, Item 8 of the regulations requires the Environmental (SA) Report to contain the following:

An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.
- 2.9 Paragraph 4 on page 4 explains the structure of the December 2011 SA. This makes clear that the SA is split into three broad parts:
- i. Chapter 1 and 2 introduce the SA process and explain what sustainable development means in practice
 - ii. Chapters 3 and 4 explain how the Council arrived at the locations for development contained in the Core Strategy through the appraisal process
 - iii. Chapter 5 appraises the policies in the Core Strategy
- 2.10 The SA Report is clear, comprehensive and detailed in the way it approaches the task of sustainability appraisal. The approach is logical and informative, thereby providing the reader with a clear understanding of the role and purpose of sustainability appraisal and how it supports the statutory plan making function. In undertaking assessments of alternative options throughout the preparation of the Core Strategy, the Council considers the December 2011 SA fully demonstrates how comprehensive consideration of alternatives has been undertaken at each stage of the preparation of the Core Strategy as required by the SEA regulations. This is illustrated by the way in which the December 2011 SA contains the details of

how the Council has considered, assessed and finally selected the strategic locations where growth and development will be delivered, the site(s) within these locations and the policy framework needed to deliver the Council's overall vision, spatial objectives and development strategy and by giving reasons for the rejection of reasonable alternatives.

- 2.11 **Assessment of Strategic Locations** – Paragraphs 3.12 to 3.17 of the December 2011 SA shows the SA has taken a comprehensive approach to testing alternative locations at each preparatory stage in the Plan's development. Seven locations, five of which have specific strategic allocations, have been fully reviewed. This has involved outlining the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken. The basis against which each strategic location was considered is set out in Appendix 7 at pages 127 – 138. As a result of this process, the Council through the SA process as confirmed at paragraph 3.24 – '*Development Strategy Preferred Option*' has identified the Bristol North Fringe at Cribbs/ Patchway and west of the M32, Yate/ Sodbury and Thornbury as locations in District where growth over and above existing allocations and commitments will be delivered, commensurate with their roles and functions. In doing so the Council has fully complied with Regulation 12(2) of the SEA Regulations.
- 2.12 This is further considered at Chapter 4, paragraphs 4.2a to 4.3, where the material change in circumstances of uplifting the strategic housing requirement from 21,500 to 26,400 in the context of the consideration of alternatives and the Council's preferred option of achieving this through focusing growth at the Bristol North Fringe (Cribbs/Patchway and Frenchay Hospital) is set out.
- 2.13 **Assessment of Sites** – having established the locations where growth will be delivered, Section 4, starting on page 29 of the December 2011 SA Report, sets out the basis against which individual sites within these locations have been selected and considered, taking into account all relevant material considerations. The December 2011 SA draws this together and can be summarised as:
- i. **Cribbs/ Patchway** – Paragraph 4.4 explains that three site options were appraised, prior to the decision of BAe Systems to close Filton Airfield. Following this announcement and the request by the Inspector to provide further direction and detail with regard to the future strategic direction of Filton Airfield in the Core Strategy, further options were considered. The basis against which each site was considered within the strategic location of Cribbs/ Patchway is further set out in Appendix 8 at pages 139 – 177.
 - ii. **East of Harry Stoke (West of the M32)** – Paragraphs 4.13 to 4.21 explain that three options were appraised. Paragraph 4.20 explains the reasoning supporting the preferred option chosen. The basis against which each site was considered within the strategic location is further set out in Appendix 8 at pages 178 – 209.
 - iii. **Yate and Chipping Sodbury** – Paragraphs 4.13 to 4.21 explain that five options were appraised. Paragraph 4.32 explains the reasoning behind north Yate as the preferred option. The basis against which each site was considered within the strategic location is further set out in Appendix 9 at pages 210 – 258.
 - iv. **Thornbury** – Paragraphs 4.32a to 4.41 explains that seven initial options (A to Fb) were appraised. This resulted in the short listing of three of those options for

further testing (C, E and FB). Appendix 10 further sets out the detailed reasoning that supported this assessment. Paragraphs 4.41a to 4.44e explains that six options were then further tested (sites 1-6) and that Option 6 – Park Farm was selected as the Council's preferred option. The basis against which sites 1-6 were considered is further set out in Appendix 11 at pages 314 – 366. The basis by which Option 6 was selected as the Council's preferred option is set out on page 65 in paragraphs 4.41a – 4.42.

- 2.14 **Assessment of Core Strategy Policies** – Section 5 of the December 2011 SA Report explains how the 37 policies that are contained in the Core Strategy have been appraised and the basis against which they were considered to be the preferred option.

3.0 Conclusion

- 3.1 The Council considers that reasonable alternatives have been assessed at each stage of the Core Strategy's production (March and December 2010 Draft Core Strategies, December 2011 Core Strategy incorporating Post-Submission Changes). The alternatives assessed at each stage are set out in the December 2011 SA as set out in the references above. The Council is therefore clear that at each stage of producing the Core Strategy, the SA process has sufficiently and comprehensively set out alternative options through all preparatory stages of plan preparation to make it clear how it has identified its preferred option with regard to strategic locations, sites within each strategic location and the policy framework to support the delivery and implementation of the Plan.

Appendix A Table 1 – Summary of all reasonable alternatives assessed in each SA Report

SA document	<u>Reasonable Alternatives</u>			
	Housing requirement quantum(s)	Strategic locations for contributing to growth considered at each iteration of Core Strategy	Core Strategy References for appraisal and consideration of alternatives	Preferred Options – Strategic location / site references
2008 Initial SA Report	28,000 to 31,000	<ol style="list-style-type: none"> 1. Yate/Chipping Sodbury. 2. East Fringe of Bristol. 3. Cribbs Causeway/ Patchway. 4. East of Harry Stoke (West of M32 corridor) 	<ol style="list-style-type: none"> 1. Section 4 (para 4.23 to 4.29) and Appendix 4. 2. Section 4 (para 4.16 to 4.22) and Appendix 3. 3. Section 4 (para 4.3 to 4.9) and Appendix 1. 4. Section 4 (para 4.10 to 4.15) and Appendix 2. 	None (due to emerging RSS and consultation nature of Issues & Options stage).
March and December 2010 SA Reports	21,500	<ol style="list-style-type: none"> 1. Yate/Chipping Sodbury. 2. East Fringe of Bristol. 3. Cribbs Causeway/ Patchway. 4. East of Harry Stoke (West of M32 corridor) 5. Thornbury. 	<ol style="list-style-type: none"> 1. Section 3 (para 3.20) and Section 4 (paras 4.22 to 4.31) and Appendices 7 & 9. 2. Section 3 (para 3.21) and Appendix 7. 3. Section 3 (para 3.18) and 4 (para 4.4 to 4.10) and Appendices 7 & 8. 4. Section 3 (para 3.19) and 4 (para 4.13 to 4.19) and Appendices 7 & 8. 5. Paragraph 4.33 to 4.44 (March 2010 SA), 4.32a to 4.44b (December 2010) and Appendices 10 and 11 (both March and December SAs). 	<ol style="list-style-type: none"> 1. Yate/ North Yate New Neighbourhood (para 4.32 and Appendix 9). 2. Location rejected (Section 3, para 3.24). 3. Cribbs Causeway/Patchway and CPNN (para 4.11 to 4.12 and Appendix 8). 4. East of Harry Stoke (West of M32 corridor) (para 4.20 – 4.21 and Appendix 8) 5. Thornbury/ Park Farm (para 4.42 - March 2010 SA Report, and para 4.41a – 4.42 - Dec 2011 SA Report) and Appendices 10 and 11 (both March and December SAs).
December 2011 SA Report	26,435	<ol style="list-style-type: none"> 1. Yate/Chipping Sodbury. 2. East Fringe of Bristol. 3. Cribbs Causeway/ Patchway (including Filton Airfield). 4. East of Harry Stoke (West of M32 corridor) 5. Thornbury. 	<ol style="list-style-type: none"> 1. Section 3 (para 3.20) and 4 (para 4.2a to 4.2f, and para 4.22 to 4.31) and Appendices 7 & 9. 2. Appendix 7 (para 4.2a to 4.2f, page 134 to 136). 3. Section 3 (para 3.18) and Section 4 (para 4.2a to 4.2f and 4.5 to 4.10b), and Appendices 7 (p.129), 8 (beginning p.140) and 8a (p.204). 4. Section 3 (para 3.19) and 4 (para 4.2a to 4.2f and 4.13 to 4.19) and Appendices 7 (p.131) & 8 (beginning p.178). 5. Paragraph 4.2a to 4.2f, Paragraph 4.32a to 4.44e and Appendices 10 and 11. 	<ol style="list-style-type: none"> 1. Yate/ North Yate New Neighbourhood (para 4.32 and Appendix 9). 2. Location rejected (Section 3 para 3.24 and Section 4, para 4.2a to 4.2f.). 3. Cribbs Causeway/Patchway and CPNN (para 4.11 to 4.12b and Appendix 8, p.167). 4. East of Harry Stoke (West of M32 corridor) (para 4.20 to 4.21 and Appendix 8, p.197). 5. Thornbury/ Park Farm (para 4.41a to 4.42 and Appendices 10, p.305, and 11, p.358).