

1. Sustainable Community Strategy

1.1. Our first concern is the failure to connect the Core Strategy to the Sustainable Community Strategy. Para 1.29 sets out the objectives of part two of the document as being to "set out the overarching policies to provide strategic alignment with the Sustainable Community Strategy, join up with other plans and programmes, and fulfil South Gloucestershire Council's high level objects for tackling climate change and delivering sustainable communities" and the Core Strategy states that it has been 'prepared to be closely integrated with the South Gloucestershire Sustainable Community Strategy' (para 1.15) .

1.2. Whilst the high order policies are aligned to the Sustainable Community Strategy in para 3.23 and the associated diagram and the Council's Climate Change commitments, the application of them to particular locations is not aligned. The plan does not check whether the application of the Core Strategy key issues and objectives are applied in part three of the Core Strategy in a manner that ensure their application is taking place in a manner that implements the Sustainable Community Strategy. So we are left with a Core Strategy whose policies could conceptually deliver the Sustainable Community Strategy but whose chosen applications have not been mapped on the SCS, and do not deliver the SCS. In effect it concludes that the Key issues in the Core Strategy COULD deliver the Sustainable Community Strategy priorities, not whether then do as then worked through in detail.

1.3. So, it would in theory be possible for residential land allocations to meet the following sustainable community strategy priorities:

- Promote safer and stronger communities,
- Being healthier
- Modernising health and community care services
- Investing in children and young people
- Valuing the environment
- Maintaining economic prosperity

1.4. But then we have to look at whether a particular allocation – and our concern is in relation to the allocation at Yate does deliver them. It does not in our opinion, a matter we return to later, but at this stage our conceptual concern is that the Core Strategy does not even attempt this mapping.

2. "Self – containment" Yate

2.1. The notion of promoting greater self containment is set out as an objective in para 1.38 "Outside the Bristol urban area, development land will be provided in Yate/ Chipping Sodbury and Thornbury, to promote greater self-containment of these settlements."

2.2. We will return to that when giving evidence about the gaps in the case for development at Yate/Chipping Sodbury in terms of whether the actual proposal that has emerged does achieve the aim of promoting greater self-containment – as it proposes providing houses without matching employment and without appropriate public transport and other services, reducing rather than enhancing self-containment.

2.3. At this stage we wish to note and object to the provision in the Vision in para 4, which does not specifically refer to the self-containment vision. Apart from evidencing a lack of consistency in the approach to justification of development at Yate (not surprising given the historic emergence of this allocation set out in earlier evidence) we object to the Vision in its own right.

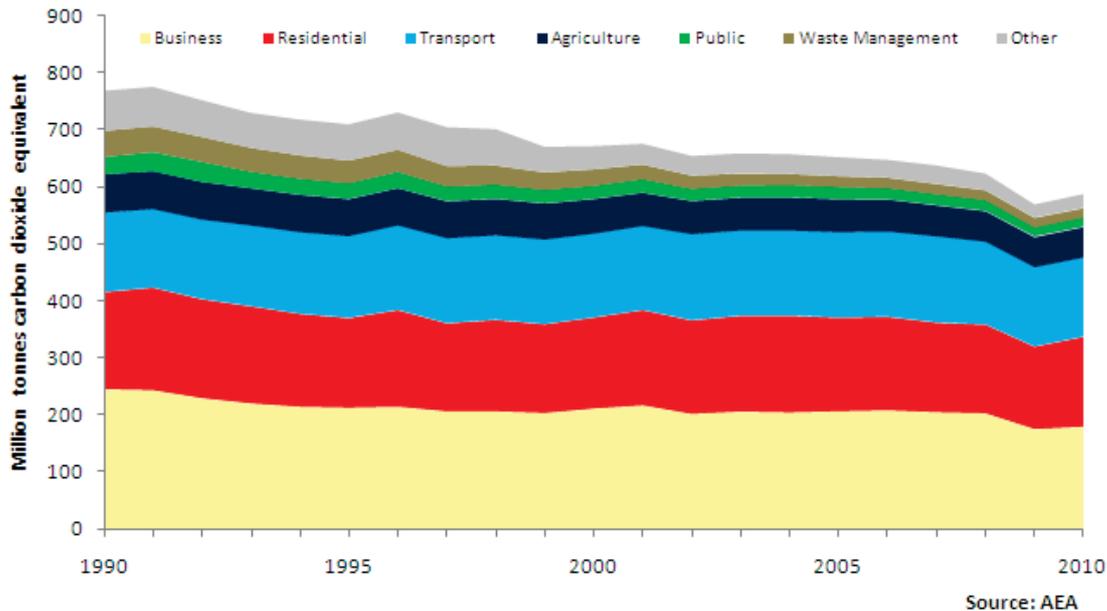
*“A new neighbourhood to the north of Yate, will accommodate around 3,000 new homes (2,400 up to 2026), employment and community uses. This will enable the towns to meet locally generated housing requirements, provide a broader employment base and provide opportunities for modern flexible working practices, enhancing their sustainability.”*

2.4. For reasons we will develop in our evidence on Yate Sodbury we do not believe the Core Strategy provides opportunities for this – rather it proposes a rather old fashioned model of housing without sufficient additional employment opportunities within walking distance to meet projected demand from the housing. There is no proposal in the plan to do anything to positively provide opportunities for modern flexible working practices – instead there is a gap, a gap in employment provision to be made up by a generalised hope that people will work from home. That is not a Strategy it is the absence of a strategy. If the strategy really IS to promote modern flexible working practices it needs some proposed actions to positively encourage this.

### 3. Reducing and Adapting to Climate Change

3.1. This is the first ‘Key Issue’ set out in the Core Strategy (para 3.2 et seq). Section 5 deals with the way in which the plan aims to respond to climate change and deliver high quality design. It is almost all about design criteria, including BREAM, and contains nothing on the locational issues associated with climate change, apart from flood risk management in para 5.14.

3.2. There is NO mention of the massive impacts of carbon footprints from travel. Official tracking of carbon emissions indicates that transport emissions continue to be the most resilient to efforts to reduce carbon footprints. To not even mention transport, and the importance of spatial juxtaposition of housing and employment is a defect – it has a significant adverse impact on both the ‘self containment’ objective and the first Key Issue.



(DECC 29/3/2012 Provisions 2011 UK Greenhouse Gas statistics)

3.3. It might be argued that Section 7 deals with 'Tackling Congestion and Improving Accessibility' – but this Section does not have a carbon footprint objective attached to it, and the policy does not mention carbon footprints. So overall the policy does not focus sufficiently on the detailed policies to underpin the Key Issue of climate change. Critically this means it places insufficient attention on the mitigation aspects of climate change rather than reducing causation aspects.

#### 4. Green Infrastructure

4.1. We have significant worries about the Green Strategic Infrastructure Map in Fig 1. It is inadequate in relation to Zone 2/ 3, in that north of Yate between the scarp at Wickwar and Tytherington the only land marked as being strategic green infrastructure is the river banks of the Brimsham Brook and Ladden Brook. To the southeast of Yate it omits the land between Yate and the scarp slope of the Cotswolds. The value of the Ladden Brook, and the land between Yate and the scarp slope is essential to the preservation of the character of the scarp slopes because they are visibility from the higher land, and dominate the views and outlook. They also provide a much wider range of green infrastructure corridors than just the river banks. So, owls living in the locality make heavy use of green infrastructure corridors not marked in green – the core field margins, and local wild deer tend not to use the river corridors (the land is too 'claggy' – the local word for meaning wet mercia mudstone/keuper marl for them) . So, there is more in the way of strategic corridors than this. We consider that in relation to Zone 1, recognising the international importance of the Severn Estuary RAMSAR/SAC/SPA designations, there is much flat low grade land that has wrongly been designated as strategic green infrastructure, although not lying within those protected zones, and not essential different in its contribution to land in the Ladden Vale – yet their designations are vastly different.