

Matter 4 – Sustainability Appraisal

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

The Sustainability Appraisal assesses the impacts of the proposed development but does not assess the impacts associated with accommodating a higher, and objectively assessed, housing requirement. Whilst the latest version of the Sustainability Appraisal does assess the impacts associated with the post-submission changes Core Strategy, (which is higher than previous versions), it does not assess the levels of growth. That as we have demonstrated should be provided in our paper on Matter 8.

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

The Initial Core Strategy Sustainability Appraisal Report April 2008 (SD17), noted that the issue of how policies relating to future development in the Rural Areas could develop had not been subject to Sustainability Appraisal. It does however note that “any matters contained within the Issues and Options document that have not been approved as part of this initial Sustainability Appraisal Report, have not been included in the appraisal due to their broad nature at this stage, which makes effective and useful appraisal/assessment difficult. Subsequent DPD production stages will see these matters developing into Options and it will be at these stages that these Options are appraised in line with SEA Regulations and the findings detailed are subject to consultation in subsequent Sustainability Appraisal Reports at the Core Strategy stages”.

However, the Sustainability Appraisal has never assessed the sustainability associated with accommodating significant growth in the Rural Areas. Whilst paragraph 3.6b of the Council's Sustainability Appraisal 2011 (PS3) states that this exercise has already been undertaken and rejected. The Council have not undertaken Sustainability Appraisal on increased growth at specific locations at sustainable settlements in the Rural Areas. This is a significant issue in the soundness of the Sustainability Appraisal.

South Gloucestershire Council has not considered all locations or settlements. As a result of the 2009 Appeal decision in which the Inspector concluded that Frampton Cotterell was a sustainable settlement for new housing, the Council should have examined the area in more detail as a potential location for new development. The land at Woodlands Farm should have been identified as an area for growth with a capacity for 400 dwellings, in the Core Strategy rather than ignored, especially in circumstances where there is a significant shortfall in provision.