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

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

SLP's previous representations set out comprehensive comments on the Sustainability Appraisal process and the deficiencies that exist. In essence the Sustainability Appraisal has not been an objective assessment of the potential contribution to more sustainable development of the plan, and the broad development options and policies it contains, according to a recognised set of objectives providing a definition of the term. Neither, crucially, is it a proper assessment and report on the social, economic and environmental implications of the alternatives available during the preparation of the plan, though the Council is required by the SEA Directive to produce such a report.

The plan requires comprehensive reappraisal and if the Sustainability Appraisal was carried out and used in the proper way, the deficiencies in the plan and the need for a substantial change to the plan would be exposed.

The Sustainability Appraisal is extremely subjective. This is completely contrary to the intention of the process which is to conduct a comprehensive, structured, consistent and explicit assessment of a strategy, proposal or policy against all aspects of the sustainability agenda, and for this arms-length but integral process to have an influence on the evolution of the plan through its successive preparatory stages. In contrast to this expectation, the Council's Sustainability Appraisal has been undertaken without an objective and accurate consideration of the issues. There are numerous generalisations and inaccuracies. One example illustrates the perverse use of the Sustainability Appraisal. This is the identification of 'the loss of Green Belt land' as a 'negative sustainability impact' and its use this way in the Sustainability Appraisal. Seeking to transpose a policy issue into a key sustainability indicator is wrong and this tactic has long since been expunged from properly undertaken sustainability appraisals of development plans. The fact that land is subject to Green Belt policy protection is immaterial in terms of assessing the ability of the future use of that land to contribute to more sustainable patterns of development. It is contrary to the evident position taken in NPPF about the purposes for including land in the Green Belt, let alone to proper planning, good practice and common sense. The approach taken by the Council is unprofessional as well as circular and self-fulfilling.

The Council suggests in its post submission modifications that it holds sustainable development to be a core principle and that it is seeking to create sustainable communities. This is patently not the case as the Council itself says. Para 1.39 states that *'The Council remains in principle opposed to significantly reducing the Green Belt to accommodate land for housing growth per se'*. That is, it places public acclaim for protecting Green Belt above seeking to create sustainable patterns of development, notwithstanding its statutory duty as a plan maker.

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

The latest version and all the previous versions of the Sustainability Appraisal do not comprehensively set out the alternative options that should have been considered at the earlier

stages during the preparation of the plan, or adequately explain and justify why options have been rejected and the choices made. As explored in detail in our previous representations, there has been a complete shift in the spatial strategy, but rather than being triggered by an objective and independent Sustainability Appraisal, the Council has attempted the post hoc rationalisation of its decision using the Sustainability Appraisal process to reassess and come up with different impacts of strategic options.

In summary the Initial Sustainability Appraisal (Consultation Draft Report May 2008) supports the Council in its interpretation of the Area of Search, which included the East Fringe.

The options considered at this stage were:

- Options for an urban extension at Cribbs Causeway/Filton
- Options for an urban extension west of the M32
- Options for an urban extension east of Kingswood
- Options for an urban extension Yate/Chipping Sodbury.

In relation to the East Fringe (east of Kingswood) the following sustainability advantages of an urban extension are noted:

- Provides land for single use employment within an area that has a low proportion of jobs:resident workers
- Close proximity of Bath – Bristol cycle route
- Good potential to integrate urban extensions with existing communities
- Grade I listed building and conservation areas protected
- Visually important hillsides and ridgeline are protected, which can form a settlement edge
- Respectful of commons and recreation land.

In relation to Yate, the sustainability disadvantages noted in the 2008 Sustainability Appraisal are as follows:

- Yate/Chipping Sodbury may not be a sustainable location for this amount of development
- Noise from railway line may affect health
- Due to limitation of local economy unlikely to deliver the amount of jobs required for new population. This will further increase long distance outward commuting from Yate, congestion and CO2 emissions, although to a lesser extent than the 5000 quantum option
- Access to higher-end shopping and leisure facilities in Yate Town Centre, but development is too remote for walking and cycling. Therefore public transport service must be provided
- Does not provide full amount of housing required by Draft RSS Panel Report. Therefore additional land for housing will have to be allocated elsewhere in South Gloucestershire if overall district amount is not reduced.

Despite these conclusions the Council then removed the option of development of an urban extension east of the Bristol urban area relying instead on development at Harry Stoke and Yate. This involved taking land out of the Green Belt at Harry Stoke without any credible review of the Green Belt and providing for a new neighbourhood at Yate. The resulting strategy is contrary to the emerging evidence-based and reported-to-be-sound Regional Strategy (regardless of its status), unsupported by evidence about the role and function of places, and directly contradictory to the conclusions of the Inspector conducting the Inquiry into the adopted Local Plan.

As part of this significant change the Council purported to reassess the impacts of the alternatives within the Sustainability Appraisal process and somehow came up with a justification for its strategic decisions which completely contradicts the previous Sustainability Appraisal findings. Neither the

East Fringe nor Yate have moved relative to other places in the meantime and it is not clear how the Council believes the performance of the East Fringe and Yate according to the Sustainability Appraisal could have so dramatically changed between the Issues and Options stage and the Pre Submission Draft Core Strategy to lead to a different strategy.

A specific example of the Council representing the same situation in an entirely different way is on page 16 of the Draft Sustainability Appraisal report 2010. The text no longer includes the basic concerns that it identified previously about the alternative of significant development at Yate, including the limitations of the local economy to match housing with jobs, and the likely increase in long distance out commuting from new development . If these were identified as a valid sustainability disadvantages in the initial appraisal, why are they not included in subsequent appraisals?

In short, despite the clear benefits of development along the eastern side of the city in a manner included in all of the options presented in the Core Strategy Issues and Options Consultation, all proposals for the eastern fringe of the city have been simply dismissed, with the explanation the highly subjective and partisan assessment presented in the Draft Sustainability Appraisal Report 2010.

The Draft Sustainability Appraisal Report issued with the Pre Submission document does not provide any indication of how the housing figure included in the Core Strategy has been arrived at. It does not appraise the potential impact of this or any other quantum of development. There is also no consideration of how the overall distribution has been arrived at and why this distribution has changed since the Core Strategy Issues and Options Consultation was undertaken in April 2008. This is a fundamental flaw in the process of sustainability appraisal as there has been no testing of growth options nor any assessment of their impacts.

In terms of how the assessment has been undertaken it is clear that it is a very basic consideration of Positive and Negative Sustainability Impacts of each of four broad potential growth areas (see para. 3.17 onwards of the Sustainability Appraisal). This is only a simple list of bullet points of pros and cons and discounts any development east of Bristol in favour of a combination of proposals within the other areas.

This assessment is superficial in the extreme and provides only one positive within regard to land south of Emersons Green and east of Kingswood followed by a list of negatives. The area to which the Draft Sustainability Appraisal Report applies this assessment appears to be the whole of the east fringe of the city, from Emersons Green in the north to Oldland Common in the south. This is far too great an area and far too general an approach on which to make sound and good planning judgements. It is clear from the negative attributes apportioned to this development area that many will be site specific and will only apply if certain areas of development were being proposed.

SLP's representations to the pre submission document set out in detail a rebuttal to the Draft Sustainability Appraisal Report and its assessment of land to the east of Bristol. This provides evidence and the attributes that might apply to land at Barry Road, Oldland Common. From that analysis it is difficult to understand how land at the east fringe of Bristol could have been objectively discounted from the Core Strategy. The merits of the plan including provision for development on the east side of Bristol are developed in the SLP Position Paper for Matter 28.