

Bristol City Council

Further Representation to the South Gloucestershire Core Strategy

Matter 4: Sustainability Appraisal

The following statement should be read in conjunction with Bristol City Council's representations to the December 2011 South Gloucestershire Post Submission Changes, relating to Matter 13: Town Centres and Retail.

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

The introduction of 35,000m² net additional retail floorspace at the 'Mall', within the Core Strategy incorporating Post Submission Changes version of policy CS14 is considered a significant change.

The Sustainability Appraisal Report, December 2011, relating to the Core Strategy incorporating Post Submission Changes, does not appear to have assessed the effects of this change, either through appraisal of the changed version of CS14, or through appraisal of the overall Core Strategy incorporating Post Submission Changes.

The Sustainability Appraisal Report, December 2011, sets out only the following on this matter; *'5.28b - Post-Submission Changes to CS14 specify an emergent town centre role at Stoke Gifford and increased floorspace at The Mall. There is no requirement for these changes to be appraised against reasonable alternatives as they are not site allocations and in the case of the Mall it is the only place in South Gloucestershire able to accommodate this amount of floorspace'*.

The City Council considers that, regardless of reasonable alternatives, a net increase of 35,000m² in out-of-centre retail floorspace at the Mall has potential for a range of effects, including potentially significant effects. These could include: increase in private vehicle trips from across the sub-region, increase in noise and air pollution and a significant diversion of trade and investment away from existing town centres to the out-of-centre Mall, affecting retail centres within Bristol, South Gloucestershire and beyond. It follows that the Core Strategy Post Submission Changes version of Policy CS14, should be the subject of an assessment of these effects within the sustainability appraisal. It is expected that there will be substantial effects on a number of the relevant sustainability objectives set out in paragraph 1.5, below.

The following Sustainability Objectives are taken from the Sustainability Appraisal Report, December 2011, Appendix 2: The SA Framework. They are considered to be relevant to the likely impacts of proposals for The Mall.

- Improve health (1.1);
- Reduce health inequalities (1.2);

- Give everyone in the district access to satisfying work opportunities paid or unpaid (3.1);
- meet local needs locally (3.4);
- Increase circulation of wealth within the area (3.5);
- Increase choice of method of travel and (4.1);
- Reduce the need/desire to travel by car (4.2).

Assessment of the potential effects of the Core Strategy Post Submission Changes Version of Policy CS14 on air quality, noise pollution and health is considered to be essential, particularly as human health and air are environmental topics required to be assessed by the SEA Directive (Annex 1 f).

Finally, and crucially, the failure to assess the effects of Policy CS14 within the Core Strategy Post Submission Changes and to report any effects with the Sustainability Appraisal Report, represents a failure to meet requirements of the SEA Directive, under Article 5.1.

Concluding comments

- 1.8 The City Council considers that the proposed changes to Policy CS14 are substantial and have potential for significant adverse effects in terms of environmental and other impacts. By not assessing these effects, SGC has failed to meet the requirements of the SEA Directive and produced an inadequate sustainability appraisal process and report.
- 1.9 This deficiency can only be addressed by carrying out a fresh sustainability appraisal of Policy CS14 and making such changes to the policy as are necessary to respond to any adverse effects.