

South Gloucestershire Core Strategy Examination in Public

Day 1 Tuesday 19th June 2012

Matter 4: Sustainability Appraisal

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On behalf of

Deeley Freed Estates and Skanska Residential UK (DFSR)

MATTER 4 – SUSTAINABILITY APPRAISAL

- 1. What deficiencies, if any, exist in the Sustainability Appraisal and how can these be addressed?**
 - 1.1 The Appraisal employs a framework that is derived from the reputable model developed by the South West Regional Assembly. We have, ourselves, used this framework from the outset in order to assess the proposal by DFSR for the land to the west of the A4018 (allocated as part of the CPNN). Therefore, we endorse it.
 - 1.2 We have pointed out in our main submission, and in our earlier representations that our criticism of the Sustainability Appraisal is in its detail not in its substance. We will not repeat the contents of the submission.
 - 1.3 However, as set out in the earlier representations, the inaccuracies in the factual basis for the appraisal are still apparent. This problem can be relatively easily resolved by making the necessary corrections.
- 2. Is the latest version of the Sustainability Appraisal sufficiently comprehensive in setting out alternative options through all preparatory stages of plan preparation?**
 - 2.1 If there is a structural weakness in the SA it is that it occasionally seems to have been used as an analytical tool, assessing the *products* of policy decisions rather than *leading* the decisions.
 - 2.2 Having said that, in the case of the land with which DFSR is concerned, the local planning authority, having appraised the location the local planning authority has agreed with DFSR that it is in the most sustainable location in the sub-region and, on sustainability grounds, fully merits its identification in the Strategy.
 - 2.3 This also appears to be the case with all of the other locations considered in the development of the spatial strategy. All have been subject to SA and, although (as with the DFSR land), one might query the detail of individual assessments, there is little doubt that the process itself has been thorough and comprehensive.