

South Gloucestershire Local Plan 2023 Phase 3 Towards a Preferred Strategy: Sustainability Appraisal Non-Technical Summary

South Gloucestershire Council

Final report

Prepared by LUC December 2023

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South Gloucestershire Local Plan 2023 Phase 3 Towards a Preferred Strategy: Sustainability Appraisal

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Chapter 1

Non-Technical Summary

Introduction

- **1.1** This Sustainability Appraisal (SA) Report: Non-Technical Summary relates to the SA of the South Gloucestershire Local Plan, which is being prepared by South Gloucestershire Council. It relates to the current consultation version of the Local Plan: Phase 3 'Towards a Preferred Strategy' (December 2023). The Local Plan sets out the long-term spatial vision and priorities for South Gloucestershire as well as the policies and sites that are required to deliver that vision over the period up to 2040.
- **1.2** Plans and strategies such as the South Gloucestershire Local Plan Phase 3 document are subject to a process called Sustainability Appraisal (SA), which assesses the likely effects of a plan on social, economic, and environmental issues. This Non-Technical Summary relates to the full SA Report which is being published for public consultation.
- **1.3** The current version of the Local Plan has been prepared following a number of previous consultations. These previous stages of plan making, and details of the SA work that has been carried out at each stage, are described in the full SA report.

Sustainability Appraisal

1.4 The Planning and Compulsory Purchase Act 2004 requires Local Plans to be subject to SA. SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes to sustainable development and minimises any potential adverse impacts. The SA process involves appraising

the likely social, environmental and economic effects of the policies and proposals in a plan from the outset of its development.

- **1.5** SEA is also a statutory assessment process, required by the SEA Regulations. The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment. The Government advises that a joint SA and SEA process can be carried out by producing an SA Report which incorporates the requirements of the SEA Regulations. This approach is being taken to the SA/SEA of the South Gloucestershire Local Plan and the process is referred to for ease as simply 'SA'.
- **1.6** The SA is being undertaken in stages alongside the preparation of the Local Plan in order to provide sustainability guidance as the plan is developed. The approach that has been taken to the SA of the South Gloucestershire Local Plan to date is described below.

Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope

1.7 The SA process began in October 2020 with the production by the Council of a Scoping Report for the new Local Plan. The Scoping Report determined what the SA should cover by reviewing a wide range of relevant policy documents and examining data to help identify what the key sustainability issues are in South Gloucestershire as well as likely future trends. This work helped to inform the development of a set of sustainability objectives (referred to as the 'SA framework') against which the effects of the plan would be assessed. The SA framework for the South Gloucestershire Local Plan is presented further ahead in this Non-Technical Summary.

1.8 To make sure that the likely sustainability effects of the policies and site options being considered for inclusion in the Local Plan are assessed consistently, the SA framework is supported by a set of site assessment criteria. These are presented in Appendix D of the full SA Report.

SA Stage B: Developing and Refining Options and Assessing Effects

- **1.9** Developing options for a plan is an iterative process which usually involves a number of consultations with stakeholders and the public. The SA process can help to identify where there may be other 'reasonable alternatives' to the options being considered for the policies and site allocations to be included in a plan. The reasonable alternative options that have been considered for the South Gloucestershire Local Plan have included alternative spatial approaches as well as potential sites for new housing and employment development, as described below.
- **1.10** The Phase 3 consultation document builds on the Phase 2 consultation, which in turn built on the Phase 1 document. The Phase 3 document sets out the Local Plan objectives, the scale and type of development to be planned for, potential site allocations, the emerging preferred strategy (and the alternative 'lenses' considered) as well as infrastructure requirements. The Phase 3 document also includes proposed policy wording in relation to topics including climate change, affordable homes, the economy and town centres.

Site Options

1.11 The Council undertook a Call for Sites exercise between July and October 2020 and the sites submitted through this exercise within the existing urban areas, Thornbury and Yate were assessed in the SA report that accompanied the Phase 2 document. Since the Local Plan Phase 2 consultation took place, a number of potential sites have been excluded for a variety of reasons. The

Housing and Employment Land Availability Assessment (HELAA) was used to understand a site's potential capacity and whether it could be delivered. The SA report appraises all of the site options considered for inclusion in the Phase 3 Plan in Chapter 4 of the main report and the policy options are presented in Chapter 6 of the main report.

SA Stage C: Preparing the Sustainability Appraisal Report

1.12 The full SA report and this Non-Technical Summary describe the SA work that has been carried out during earlier stages of Local Plan preparation and set out the SA findings for the Local Plan Phase 3 document, as well as the reasonable alternative options considered. Likely significant effects, both positive and negative, have been presented, taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects.

SA Stage D: Consultation on the Local Plan and the SA Report

1.13 South Gloucestershire Council is inviting comments on the full SA Report and this Non-Technical Summary as well as the Local Plan Phase 3 document itself. These documents are being published on the Council's website for a period of representation between December 2023 and February 2024.

SA Stage E: Monitoring Implementation of the Local Plan

1.14 Recommendations for monitoring the sustainability effects of implementing the South Gloucestershire Local Plan are presented in Chapter 7 of the full SA Report and are described further ahead in this Non-Technical Summary.

Policy Context

- **1.15** There are a large number of plans and programmes that could be relevant to the preparation of the South Gloucestershire Local Plan. In particular, the Local Plan must adhere to national planning policy as set out in the National Planning Policy Framework (NPPF).
- 1.16 The Local Plan should provide a spatial expression of other plans and programmes where relevant, to assist in their implementation. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and regional level. In line with the requirements of the SEA Regulations, relevant international, national, regional, sub-regional and local plans have been reviewed in detail in relation to their objectives, targets and indicators and their implications for the Local Plan and the Sustainability Appraisal. The full review can be seen in Chapter 3 and Appendix B of the full SA Report.
- **1.17** The Local Plan must be consistent with the requirements of the NPPF, which states:

"Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other

economic, social and environmental priorities; and a platform for local people to shape their surroundings."

- **1.18** The NPPF sets out information about the purposes of local plan-making, stating that plans should:
 - "Be prepared with the objective of contributing to the achievement of sustainable development;
 - Be prepared positively, in a way that is aspirational but deliverable;
 - Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
 - Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
 - Be accessible through the use of digital tools to assist public involvement and policy presentation; and
 - Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area."
- **1.19** The NPPF also requires Local Plans to be 'aspirational but deliverable'. This means that opportunities for appropriate development should be identified in order to achieve net gains in terms of sustainable social, environmental and economic development; however significant adverse impacts in any of those areas should be avoided.
- **1.20** The NPPF requires local planning authorities to set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
 - "Housing (including affordable housing), employment, retail, leisure and other commercial development;

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- Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- Community facilities (such as health, education and cultural infrastructure);
 and
- Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."
- **1.21** The NPPF also promotes well-designed places and development, and plans should "at the most appropriate level, set out a clear design vision and expectations".
- **1.22** Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development, including qualitative aspects such as design of places, landscapes, and development.

Baseline Information

1.23 In line with the requirements of the SEA Regulations, consideration has been given to the current state of the environment in South Gloucestershire. Detailed baseline information for the authority is presented in Appendix C of the full SA Report and it has been updated throughout the SA process. As well as environmental issues, the baseline information includes a description of social and economic issues in South Gloucestershire.

Key Sustainability Issues

1.24 The baseline information contributed to the identification of a set of key sustainability issues for South Gloucestershire, which in turn helped to develop

a locally appropriate SA framework (i.e. a set of SA objectives) that would be used for appraising the emerging Local Plan. Key sustainability issues for South Gloucestershire section sets out the key sustainability issues for South Gloucestershire. In line with the requirements of the SEA Regulations, consideration has been given to the likely evolution of the environment in the authority if the Local Plan were not to be implemented (see Chapter 3 of the full SA Report). In general, the adopted Core Strategy (adopted in 2013), Policies, Sites and Places Plan (adopted in 2017) and where appropriate, the Joint Waste Core Strategy (adopted in 2011) contain policies for South Gloucestershire which set out requirements that will help to address the key sustainability issues for the plan area. In the absence of the new Local Plan the requirements of these policies along with national planning policy would continue to help limit the most adverse effects in relation to these issues. However, without the Local Plan development is more likely to come forward at less sustainable locations in South Gloucestershire given changing circumstances and the emergence of more up to date evidence since the adoption of the current Core Strategy. The new Local Plan presents an opportunity to include updated policies to better address the trends observed across these key sustainability issues. It also presents an opportunity to respond positively to issues of importance on the national stage such as climate change, biodiversity and health and wellbeing as well as ensuring that the housing and employment needs of local people are met.

Climate Change

1.25 Climate Change is likely to affect biodiversity, increase hazards from fluvial flooding and also affect the social and economic aspects of life. The diverse character of South Gloucestershire (in that it neighbours Bristol City and the draw this creates for jobs, tourism, accommodation etc. is in stark contrast to the rural areas that are dispersed) means that there are likely to be difficulties with regards to the reductions in greenhouse gas emissions.

Opportunities Presented by the Local Plan

- **1.26** Climate change is likely to have on-going effects regardless of the Local Plan. The effects of climate change are resulting in extreme weather events becoming more common and more intense. Flood risk is of particular significance in this regard, alongside heatwaves and drought. The adopted Local Plan already includes policies seeking to address this issue, and these would continue to apply in the absence of the new Local Plan through the NPPF.
- **1.27** The new Local Plan presents an opportunity to build on these overarching policies through more specific policies and site allocations that act positively with respect to climate change, especially those that limit the need to travel through the appropriate siting and design of new development or consider flood risk. The Local Plan also offers the opportunity to:
 - Increase the requirement for zero carbon, energy efficient building design and construction in new development, and support retrofitting to decarbonise heating;
 - Promote green infrastructure to deliver flood retention, shading/ cooling, air quality improvements and safe havens for vulnerable species;
 - Increase renewable and low carbon energy generation; and
 - Minimise the need to travel and decarbonise travel where it is needed. Having declared a Climate Emergency within the authority, inclusion in the Local Plan helps strengthen the ability to reduce the impacts of climate change.

Increasing Demands for Energy Provision

1.28 New development in South Gloucestershire will mean there will be increasing demands for energy provision in the future.

Opportunities Presented by the Local Plan

- **1.29** The delivery of new homes and other development over the plan period could increase demand for energy consumption in South Gloucestershire. At present, the adopted Local Plan includes policies seeking to address this issue, and these could continue to apply in the absence a new Local Plan.
- **1.30** The Local Plan offers the opportunity to update these policies to encourage improved energy efficiency across the unitary authority, and increase the proportion of energy which is supplied by renewable sources.

Threats to Areas of High Ecological Value

1.31 South Gloucestershire contains many areas of high ecological value including sites of international and national importance. These and undesignated areas are under threat from urbanising pressures (pollution of soils, water, air and light as well as noise pollution), as well as disturbance and damage from recreational use and also invasive non-native species.

Opportunities Presented by the Local Plan

1.32 Pressures on the natural environment in the authority are likely to continue regardless of the new Local Plan, particularly given the likely requirement for more housing and employment development to meet growth projections through the SDS. It will be important to consider the potential for effects on designated biodiversity sites as well as on wider ecological networks. Effects will be influenced by climate change, and there is potential for effects from new development as a result in of direct habitat loss, damage and fragmentation. The adopted Core Strategy and Policies, Sites and Places Plan already includes policies seeking to address these pressures, and these could continue to apply in the absence a new Local Plan.

1.33 However, without the site allocations to be made through the later stages of the Local Plan, further development may not come forward in the most appropriate locations and impacts on biodiversity could be amplified. The Local Plan also offers the opportunity to update planning policy in relation to the protection of areas which are of importance in terms of their biodiversity and geodiversity with consideration for the future evolution of development in South Gloucestershire. The Local Plan should also help to promote biodiversity net gain and good and effective biosecurity practices. The SA for the new Local Plan will, in time, incorporate the findings of other technical work undertaken, including the Habitats Regulations Assessment, which will provide further insight into biodiversity impacts and present opportunities to limit adverse impacts at such locations.

Urbanising Influences

1.34 The countryside is under pressure from urbanising influences which are driven by a need for new housing provision and economic growth and infrastructure improvements to support new growth.

Opportunities Presented by the Local Plan

- **1.35** Pressures on the countryside are likely to continue regardless of the implementation of a new Local Plan, although the adopted Core Strategy sets out the areas of growth and locations of development (including Green Belt) mainly within or adjacent to existing urban areas and market towns.
- 1.36 The Local Plan presents an opportunity to update and expand on these policies and further mitigate pressures on the countryside through more specific policies and site allocations that take into account their impacts on South Gloucestershire's landscape. The Local Plan will be able to prevent development coming forward in inappropriate locations, and tailor policy to the area's landscape setting. The Local Plan also mentions developing other options for protecting area of open countryside which communities cherish and

help develop Strategic Green Infrastructure corridors as an issue relating to Green Belt in South Gloucestershire.

Air Quality

1.37 The reliance on the private car for commuting has resulted in areas within South Gloucestershire with poor air quality and Air Quality Management Areas (AQMAs) being designated. This is compounded due to the authority's position in relation to the M4, M5 and M32, multiple A Roads and a wide range of industrial activity in the authority.

Opportunities Presented by the Local Plan

- **1.38** It is anticipated that traffic congestion and air and noise pollution will continue to increase with the rising population and car dependency will continue to be high. The adopted Core Strategy already contains policy that seeks to provide strategic transport infrastructure, that would remain in place without the new Local Plan.
- **1.39** The Local Plan presents the opportunity to update and expand on the existing policy and minimise the need to travel and decarbonise travel where it is needed. Having declared a Climate Emergency within the authority, inclusion in the Local Plan helps strengthen the ability to minimise development's impact. The Local Plan could further identify how poor air quality has a direct effect on health, and traffic related pollution is another big issue.

Landscape Character

1.40 South Gloucestershire has a varied and distinctive landscape character from the nationally designated Cotswolds Area of Outstanding Natural Beauty (AONB) to more local hillsides, valleys and features, which are under pressure from new development.

Opportunities Presented by the Local Plan

- **1.41** Without intervention, development could happen in an unplanned and ad hoc manner, which has the potential to impact on landscape character within South Gloucestershire. This includes the potential for detrimental development to occur within the AONB and its wider setting. The adopted Local Plan already includes policies to protect and enhance the landscape, including those that ensure development proposals are only deemed acceptable where they conserve and where appropriate, enhance the quality, amenity, distinctiveness and special character of the landscape.
- **1.42** The Local Plan offers the opportunity to update the current policy position in response to the evolution of the area, and development pressures it faces through more specific development management policies and site allocations that are selected following consideration of their impacts on landscape character through the SA.

Historic Assets

1.43 South Gloucestershire includes a number of historic assets of designated importance which are under pressure from new development.

Opportunities Presented by the Local Plan

- **1.44** Without intervention, development could happen in an unplanned and ad hoc manner, which has the potential to impact on heritage assets within South Gloucestershire. The adopted Local Plan includes policies that seek to protect and enhance the historic environment which would continue to apply in the absence of a new Local Plan.
- **1.45** The new Local Plan provides the opportunity for development to be located in areas which are less sensitive in terms of their impact on heritage assets

(with consideration for other sustainability issues) through the SA process applied to potential site allocations. The Local Plan provides a way of updating the policy position the Council has taken with regards the protection of heritage assets and their setting through appropriate development policies.

Flood Risk

1.46 There are areas of high flood risk, particularly around the Severn Estuary and main river corridors. Parts of South Gloucestershire are liable to flooding.

Opportunities Presented by the Local Plan

- **1.47** Without intervention, development could happen in an unplanned and ad hoc manner, which has the potential to impact on flooding within South Gloucestershire. The adopted Local Plan already includes policies that seek to reduce flood risk through the appropriate siting of development, supporting the provision of Sustainablle Drainage Systems (SuDS) and other proposals which would reduce vulnerability to flood risk. These policies would continue to apply in the absence of a new Local Plan.
- **1.48** The Local Plan offers the opportunity to locate development in locations which present the lowest flood risk, as well as encourage flood resilient development. The also plan provides an opportunity to encourage Natural Flood Management measures which can provide benefits in terms of reduced flood risk and support for local biodiversity, including green infrastructure and SuDS.

Water Quality

1.49 Parts of the authority fall within a nitrate vulnerable zone, which indicates that some water bodies are exposed to significant levels of nitrates, with a potential impact on local water quality. In addition, phosphates are one of the main reasons water bodies fail their Water Framework Directive status. New

development puts pressure on both ground and surface waters, in terms of both quality and quantity.

Opportunities Presented by the Local Plan

- **1.50** Without intervention, development could happen in an unplanned and ad hoc manner, which has the potential to impact on water quality and quantity within South Gloucestershire. The adopted Local Plan includes policies to protect and enhance water quality which would continue to apply in the absence of a new Local Plan.
- 1.51 The Local Plan presents the opportunity to allocate new development at sites which are less likely to have adverse impacts in terms of their local water quality following their consideration through the SA process. There is also the opportunity to include new development management policies thereby updating the planning policy provision in protecting the quality of water including ground and surface waters. All new development should be encouraged to be nutrient neutral in terms of phosphates and nitrates. While the EA notes that wastewater infrastructure should also include practical inclusion of appropriate phosphate/nitrate/nutrient stripping facilities, this is not something that can be addressed by the Local Plan. New Local Plan policies also present an opportunity to help to limit adverse impacts resulting in terms of water quantity (e.g. through encouraging water efficiency techniques within new developments).

Demography

1.52 Demography of the area – An increasing number of people live in South Gloucestershire and our population is increasing in age. An ageing population will require careful consideration of the adaptability and accessibility of new homes, infrastructure, services and facilities.

Opportunities Presented by the Local Plan

- **1.53** The ageing population is likely to continue regardless of the implementation of a new Local Plan. The adopted Local Plan includes policies that seek to encourage new developments that contribute to the provision of sustainable and inclusive communities that would continue to apply in the absence of a new Local Plan.
- **1.54** The Local Plan offers the opportunity to build on this policy approach through development management and site allocation policies which will help to meet the requirements of the future age structure of South Gloucestershire. In addition to development management policies which promote the provision of homes suitable for all sections of the community this will include the consideration of sites in terms of access to existing services centres and services and facilities through the SA process.

Inequalities and Deprivation

1.55 Inequalities and Deprivation – Despite being a relatively affluent authority there are inequalities relating to access to employment, educational attainment and health, which are focused in certain areas which are designated as priority neighbourhoods. There are pockets in the authority that are recognised areas of deprivation and where evidence from a range of measures show that residents experience social deprivation and lower life expectancy.

Opportunities Presented by the Local Plan

1.56 It is expected that areas of inequalities and deprivation will be maintained or worsened without intervention. Although not explicit in the adopted Local Plans, opportunities to consider access to healthcare, open spaces and other recreational facilities would have been considered during identification and allocation of sites.

1.57 The Local Plan presents further opportunities to allocate new housing development sites at locations which are in close proximity to existing healthcare facilities, open spaces and other facilities which might encourage healthier lifestyle choices including increased levels of physical activity. The new Local Plan might also be used to protect existing assets from development, and to include policy direction regarding housing types, mix, size, design and inclusion of private outdoor space.

Employment

1.58 There is a need to ensure that there are employment sites available to accommodate businesses of all sizes, including key local sectors in a rapidly changing economic and retail environment. Employment sites across the urban areas have been lost to other uses, particularly housing.

Opportunities Presented by the Local Plan

- **1.59** Without the implementation of new site allocations to be included in the new Local Plan there may be less certainty about the delivery of employment land and necessary transport infrastructure and therefore any potential for economic stagnation would be less likely to be addressed.
- **1.60** The Local Plan presents the opportunity to protect employment sites that are important for the local economy over the plan period, setting out land for new sites. It also presents the opportunity to assess existing safeguarded employment sites for their suitability to be redeveloped to incorporate more flexible and adaptable uses (where possible), to ensure that the needs of businesses are met for the plan period.

Safeguarded Employment Land

1.61 Ensuring there is a balanced range of safeguarded employment land across South Gloucestershire, so that all communities have access to job opportunities that are accessible by walking, cycling and effective public transport in order to create and maintain sustainable communities. Employment land is being lost throughout South Gloucestershire due to pressure for housing. Areas in the East Fringe have a lower job to population ratio, consequently commuting patterns are higher. The loss of safeguarded employment land has been particularly noticeable in the East Fringe – with the loss of nearly 17 hectares of land from employment uses.

Opportunities Presented by the Local Plan

- 1.62 It is expected that employment land could continue to be lost to housing development within South Gloucestershire. The adopted Local Plan provides guidance for where development should go across the authority, as well as preventing the loss of employment land which would continue to apply in the absence of a new Local Plan.
- **1.63** The Local Plan provides the opportunity to amend and strengthen the policies surrounding the loss of employment land alongside limiting the loss of employment land and allocating land in key areas to rebalance the jobs to resident ratio. The Local Plan further presents the opportunity to ensure that there are sufficient jobs in local areas, to minimise the impacts of commuting on the environment and to allow existing and new businesses to invest and grow within South Gloucestershire.

Town Centres and High Streets

1.64 Town Centres and High Streets face evolving pressures in terms of outside retail offers and the continued importance of e-retailing and the provision of services online. This has led to an increase in vacancies in the town centres.

Opportunities Presented by the Local Plan

- 1.65 In line with national trends, it is expected that town centre vacancies are expected to increase within South Gloucestershire. There are a number of policies in the Local Plan that seek to protect and enhance the vitality and viability of the town centres which would continue to apply in the absence of a new Local Plan.
- **1.66** The Local Plan provides the opportunity to incorporate updated policies to protect the evolving role of the town centres. As the plan is looking to also incorporate Urban Lifestyles, it is looking to regenerate areas as well as provide accommodation and an increase in footfall to these areas. This will enhance the opportunities within these centres as areas for economic growth, job provision and housing. The local plan also gives statutory spatial expression to the Council's regeneration objectives and commitment to support High Streets and Town Centres.

Promoting Healthy Lifestyles

1.67 Promoting Healthy Lifestyles – residents in South Gloucestershire are generally healthier and have a better life expectancy than the national average. However, there is an upward trend in chronic diseases, which reflects increases in the elderly population and the prevalence of child and adult obesity. Poor air quality also has a direct effect on health in parts of the plan area given the prevalence of high volumes of traffic.

Opportunities Presented by the Local Plan

- 1.68 It is likely that without intervention, development in the plan area could be located so that issues of air quality deteriorate, and sensitive uses are provided in areas which are most affected by this issue. The provision of new development in a manner which does not provide good access to essential services and facilities and does not allow for the incorporation of infrastructure to support active travel is also less likely to encourage active lifestyles in South Gloucestershire. There are policies in the adopted Policies, Sites and Places Plan that promote health and wellbeing and active travel which would continue to apply in the absence of a new Local Plan.
- **1.69** The Local Plan provides the opportunity to incorporate updated policies to distribute new development as to encourage travel by active modes and enhanced Active Travel Routes. It can also ensure access to services and facilities which support local public health including the requirement to make new provisions of this type to ensure that existing services do not become overburdened.

Providing Enough New Homes

1.70 Providing enough new homes for the growing and changing population of South Gloucestershire (including affordable and to meet the needs of different groups) is a key issue. This directly impacts the ability of the authority to ensure it meets the government planning requirements to have a 5 year supply of deliverable housing land.

Opportunities Presented by the Local Plan

1.71 It is expected that a sufficient supply of housing may not be provided to meet the growing and changing population within South Gloucestershire. The Core Strategy seeks to increase the number of houses in South Gloucestershire

by providing a minimum of 28,355 new homes of a diverse and affordable range. The majority of this housing is provided through strategic allocations (such as North Yate New Neighbourhood, and Cribbs Patchway New Neighbourhood). However, alongside the need to increase housing provision in the future for all communities including the travelling communities, there is the need to improve the diversity and affordability of stock being delivered.

1.72 The Local Plan presents the opportunity to build on the strengths of the Core Strategy, and can seek to allocate land that is sustainable, adaptable and affordable. Without the Local Plan, housing supply issues will intensify, and house prices will continue to rise unsustainably. Without the implementation of the site allocations to be included as part of the Local Plan there may be less certainty about the delivery of affordable housing.

Lack of Suitable Land

1.73 Lack of suitable land remaining within existing settlement limits for development causes additional growth pressures in urban areas. This needs to be balanced with achieving a high quality of life and safeguarding our built and natural assets in urban locations.

Opportunities Presented by the Local Plan

- **1.74** It is expected that pressure on urban areas will continue within South Gloucestershire. The adopted Local Plan has allocated land that was deemed the most sustainably suitable for development, however, there is increasing pressure for land outside of existing settlements to be developed.
- **1.75** The Local Plan presents the opportunity to refresh the settlement boundaries where appropriate to protect the countryside from inappropriate development resulting from growth pressure.

Growth Pressures for Rural Areas

1.76 There has been an increase in growth pressures for rural areas, and an increased amount of speculative development, particularly outside the Green Belt. This has negatively impacted the unique character, natural and built assets in rural South Gloucestershire.

Opportunities Presented by the Local Plan

- 1.77 It is expected that pressure on rural areas will continue within South Gloucestershire. Given the housing requirements for the region, there is a risk of speculative and ad-hoc development in the absence of a new Local Plan.
- 1.78 The Local Plan presents the opportunity for well-planned rural growth which can assist in providing new homes, affordable housing and support rural services, facilities and long term sustainability.

Need to Safeguard Land for Infrastructure

1.79 Need to safeguard land for infrastructure needed to support growth, from cycle routes, public transport routes, roads, community, education and health facilities.

Opportunities Presented by the Local Plan

- 1.80 In order to achieve sustainable communities, it is important to ensure that sufficient land is available to enable the provision of infrastructure.
- **1.81** The Local Plan presents an opportunity to ensure that land is adequately safeguarded for infrastructure provision and to ensure that speculative developments do not sterilise future infrastructure aspirations.

Minerals

1.82 The need to ensure a steady and adequate supply of minerals, and avoid the needless sterilisation of mineral resources.

Opportunities Presented by the Local Plan

- **1.83** Without intervention, it is expected that insufficient provision will be made for minerals to be worked, and that essential mineral resources will become sterilised through inappropriate development, causing detrimental effects on the aggregates industry in South Gloucestershire and more widely.
- 1.84 The Local Plan presents an opportunity to ensure that a steady and adequate supply of minerals is maintained. It also presents an opportunity to ensure minerals are extracted in a sustainable way and that the restoration of former mineral extraction areas within South Gloucestershire is progressed over the coming years.

Method and SA Framework

Use of the SA Framework

- **1.85** The key sustainability issues for South Gloucestershire fed into the identification of a set of SA objectives which are the main tool used at each stage of the SA for assessing the likely effects of the options and draft policies in the Local Plan. The SA framework for the South Gloucestershire Local Plan is presented in the section following Table 1.1.
- 1.86 Within the assessment matrices showing the likely sustainability effects of the Local Plan policy and site options, symbols and colour-coding have been

used against each SA objective to show whether an effect is likely to be positive or negative, minor or significant, or uncertain as follows:

Table 1.1: Key to symbols and colour coding used in the SA of the South Gloucestershire Local Plan

Symbol and Colour Coding	Description
++	Significant positive effect likely.
++/-	Mixed significant positive and minor negative effect likely.
+	Minor positive effect likely.
+/-	Mixed minor positive and minor negative effect likely.
-	Minor negative effect likely.
/+	Mixed significant negative and minor positive effect likely.
	Significant negative effect likely.
0	Negligible effect likely.
?	Likely effect uncertain.

The SA Framework for the South **Gloucestershire Local Plan**

Theme 1: Climate change

Sustainability Objective 1a

- 1a. To minimise South Gloucestershire's contribution to climate change through a reduction of greenhouse gas emissions from all sources and facilitate the aim of carbon neutrality by 2030.
 - Promote energy efficient and water efficient design.
 - Encourage the provision and use of renewable energy infrastructure.
- NB: Greenhouse gas emissions associated with travel were covered under another SA objectives.

SEA Topic

- Air
- Climatic factors
- Material assets

Sustainability Objective 1b

- 1b. To support South Gloucestershire's adaptation to unavoidable climate change.
 - Promote design which will help to mitigate the effects of climate change (for example through appropriate building orientation and appropriate incorporation of SuDS)?

Support the protection, restoration, creation, enhancement and the multi-functionality of the green/blue infrastructure network?

SEA Topic

- Air
- Climatic factors
- Material assets

Theme 2: Improve the health, safety and wellbeing of all

Sustainability Objective 2a

- 2a. Achieve reasonable access to public open space (Designated Open Spaces, Town and Village Greens) and Public Rights of Way, taking into account quality and quantity.
 - Reasonable distance In line with South Gloucestershire planning policy quality standards established in the Open Space Audit.

SEA Topic

- Landscape
- Human health
- Population

Sustainability Objective 2b

2b. Minimise the impact of noise on sensitive receptors.

- Sensitive uses = residential, schools.
- Relevant distance Adjacent to noise generating uses.

SEA Topic

- Human health
- Population

Sustainability Objective 2c

- 2c. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality.
 - Sensitive uses = residential, schools, children's facilities, nursery's, elderly people accommodation.

SEA Topic

- Air
- Climatic factors
- Human health
- Population

Sustainability Objective 2d

 2d. Achieve reasonable sustainable access to healthcare services and facilities (Doctors and Dentists).

SEA Topic

Material assets

- Human health
- Population

Theme 3: Support communities that meet people's needs

Sustainability Objective 3a

3a. Deliver a suitable quantum of high quality housing for South Gloucestershire.

SEA Topic

- Material assets
- Population

Sustainability Objective 3b

3b. Deliver a suitable mix of high quality housing types and tenures (including affordable housing) for all parts of society within South Gloucestershire.

- Material assets
- Population

Sustainability Objective 3c

3c. Achieve reasonable sustainable access to community facilities (Post Office, Dedicated Community Centre, Public House, Library).

SEA Topic

- Material assets
- Human health
- Population

Sustainability Objective 3d

3d. Achieve reasonable sustainable access to educational facilities (primary schools, secondary schools).

SEA Topic

- Material assets
- Population

Sustainability Objective 3e

3e. Achieve reasonable sustainable access to retail and food buying services and facilities (Town and District Centres or local comparison stores, supermarkets and local convenience stores).

- Material assets
- Population

Sustainability Objective 3f

3f. Reduce poverty and income inequality, and improve the life chances of those living in areas of concentrated disadvantage around Kingswood; Staple Hill and Yate.

SEA Topic

- Material assets
- Population

Sustainability Objective 3g

3g. Improve access to high speed broadband.

SEA Topic

Population

Theme 4: Develop a diverse and thriving economy that meets people's needs

Sustainability Objective 4a

4a. Deliver a reasonable quantum of employment floorspace.

- Material assets
- Population

Sustainability Objective 4b

4b. Achieve reasonable sustainable access to major employment areas.

SEA Topic

- Material assets
- Population
- Air
- Climatic factors

Theme 5: Maintain and improve environmental quality and assets

Sustainability Objective 5a

■ 5a. Designated Assets: Minimise impact on and where appropriate enhance the historic environment, national heritage assets and their settings.

SEA Topic

Cultural heritage

Sustainability Objective 5b

■ 5b. Undesignated Assets: Minimise impact on and where appropriate enhance the historic environment, local heritage assets and their settings.

SEA Topic

Cultural heritage

Sustainability objective 5c

- 5c. Taking into account the effects of climate change, protect and enhance biodiversity and the nature network, including protected sites and species, to achieve a measurable net gain and greater natural resilience.
 - This SA objective has been updated to take into account the effects of climate change on biodiversity. The words "Minimise impact on and where possible enhance habitats and species" were replaced with "Taking into account the effects of climate change, protect and enhance biodiversity and the nature network, including protected sites and species, to achieve a measurable net gain and greater natural resilience".

SEA Topic

- Biodiversity
- Climatic factors
- Fauna & flora

Sustainability Objective 5d

■ 5d. Minimise impact on and where appropriate enhance valued landscapes (including the Cotswolds AONB and its setting).

- Cultural heritage
- Landscape

Sustainability Objective 5e

■ 5e. Deliver a range and quality of, and increased access to new green infrastructure across South Gloucestershire AND protect and enhance existing Green Infrastructure (GI).

SEA Topic

- Biodiversity
- Climatic factors
- Fauna & flora
- Landscape
- Soil
- Water

Sustainability Objective 5f

■ 5f. Promote the conservation and wise use of land, maximising the re-use of previously developed land.

SEA Topic

- Fauna & flora
- Landscape
- Soil

Sustainability Objective 5g

■ 5g. Minimise the loss of productive land, especially best and most versatile agricultural land.

SEA Topic

- Landscape
- Soil

Sustainability Objective 5h

■ 5h. Minimise vulnerability to tidal/fluvial flooding (taking account of climate change), without increasing flood risk elsewhere.

SEA Topic

- Climatic factors
- Water

Sustainability Objective 5i

■ 5i. Minimise vulnerability to surface water flooding and other sources of flooding, without increasing flood risk elsewhere.

SEA Topic

Climatic factors

Sustainability Objective 5j

■ 5j. Minimise harm to, and where possible protect and enhance (surface and groundwater) water quality and quantity/availability.

SEA Topic

Water

Theme 6: Use of natural resources

Sustainability Objective 6a

6a. Reduce waste.

SEA Topic

Material assets

Sustainability Objective 6b

6b. Minimise consumption and extraction of minerals.

SEA Topic

Material assets

SA of the Alternative Growth Lenses

1.87 Three alternative growth lenses were identified and subject to SA. The SA findings for these alternative lenses are represented in detail in Chapter 4 of the full SA Report.

SA of the Alternative Site Options

1.88 In order to meet South Gloucestershire's projected housing and employment needs over the plan period, the Council has identified a large number of site options which could potentially be allocated for housing, mixed use or employment.

- **1.89** Each of the site options has been appraised in line with the methodology set out in detail in Chapter 2 of the full SA report and summarised earlier in this Non-Technical Summary. The site assessment criteria that have been used to inform the appraisal of these site options are presented in Appendix D in the full SA report.
- **1.90** The appraisal of all site options has been undertaken using a 'policy off' approach. That is to say, mitigation which might be delivered through the policies in the Local Plan has not influenced the findings presented.
- **1.91** A summary of the SA findings for the site options is presented in Tables 4.1, 4.2 and 4.3 in Chapter 4 of the full SA report.

Likely Effects of the Local Plan Phase 3 Consultation Document 'Towards a Preferred Strategy' (December 2023)

1.92 This section presents the SA findings for the policies and site options included in the South Gloucestershire Local Plan Phase 3 document. The likely effects of all of the policies in the Local Plan are presented in Table 1.2 overleaf. Table 1.3, which follows, summarises the likely cumulative effects of the Local Plan as a whole on each SA objective. The expected cumulative effects of the plan are described in full in Chapter 6 of the full SA Report.

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Table 1.2: Summary of the SA findings for the Policies

Policy	1a	1b	2a	2b	2c	2d	3a	3b	3c	3d	3e	3f	3g	4a	4b	5a	5b	5c	5d	5e	5f	5g	5h	5i	5j	6a	6b
Climate change mitigation, adaptation and resilience	++	++	+	0	+	0	+	0	+	0	+	0	0	0	+	0	0	+	0	+	+	0	0	0	0	0	0
Energy management in new development	++	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Embodied carbon	++	+	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	++	0
Renewable and low carbon energy systems	++	0	0	0	0	0	+	0	0	0	0	0	0	0	0	-?	-?	-?	-?	0	0	0	0	0	+	0	0
Community energy	++	0	0	0	0	0	0	0	0	0	0	+	0	0	0	-?	-?	-?	-?	0	0	0	0	0	0	0	0
Affordable homes	0	0	0	0	0	+	+	+	0	0	0	+	0	0	0	-?	-?	-?	-?	0	0		0	0	0	0	0
Sites for gypsies and travellers	0	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	+/-	+	0	0	0	0	0	0	0
Sites for traveling showpeople	0	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	+/-	+	0	0	0	0	0	0	0
Internal space and accessibility standards	0	0	0	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Minerals	-	0	+?	-	-	0	0	0	0	0	0	0	0	0	0	-?	-?	-?	-?	0	0	0	0	0	0	0	 ?/+
Economy and jobs	+/-?	0	0	+/-?	-?	0	0	0	+	0	0	+	0	++	+	-?	-?	-?	-?	0	+	?	0	0	0	0	0
Town centres	+/-?	0	0	+/-?	+/-?	+	0	0	+	+	+	+	0	++	+	+	+	0	+	0	+	0	0	0	0	0	0
Strategic and major site delivery	++/-	+	+	+/-?	-?	+	++	++	+	+	+	+	+	++	+	+/-?	+/-?	+/-?	+/-?	+	0	?	+	+	0	0	0
Stewardship arrangements	0	+	+?	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0

Table 1.3: Summary of likely cumulative effects of the Phase 3 Local Plan

SA Objective	Cumulative Effect
SA Objective 1a: Contributing to climate change	+/-?
SA Objective 1b: Adaptation to climate change	+/-?
SA Objective 2a: Public open space	+?
SA Objective 2b: Noise	+/-
SA Objective 2c: Air quality	+/-
SA Objective 2d: Access to healthcare facilities	+?
SA Objective 3a: Delivery of high quality housing	++
SA Objective 3b: Delivery of mix of housing	++
SA Objective 3c: Access to community facilities	+
SA Objective 3d: Access to educational facilities	+
SA Objective 3e: Access to retail	+
SA Objective 3f: Sustainable travel	++
SA Objective 3g: Deprivation	+
SA Objective 4a: New employment floorspace	++
SA Objective 4b: Access to major employment areas	++
SA Objective 5a: Designated assets	-?
SA Objective 5b: Undesignated assets	-?
SA Objective 5c: Biodiversity	+/-

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SA Objective	Cumulative Effect
SA Objective 5d: Landscape	+/-
SA Objective 5e: Green infrastructure	+/-
SA Objective 5f: Promote the conservation and wise use of land	/+
SA Objective 5g: Minimise the loss of productive land	/+
SA Objective 5h: Tidal/fluvial flood risk	
SA Objective 5i: Surface water flood risk	
SA Objective 5j: Water resources	
SA Objective 6a: Reduce waste	/+
SA Objective 6b: Minimise consumption and extraction of minerals	/+

Monitoring

1.93 The SEA Regulations require that monitoring is undertaken in relation to the significant effects of implementing the Plan in question. The proposed monitoring framework for the South Gloucestershire Local Plan section below sets out a number of suggested indicators for monitoring the potential significant sustainability effects of implementing the South Gloucestershire Local Plan.

Proposed Monitoring Framework for the South Gloucestershire Local Plan

SA Objective 1a. Climate change mitigation

- Per capita CO2 emissions in South Gloucestershire.
- Renewable energy generation by installed capacity and type.
- Percentage of major developments providing a renewable or low carbon heat generation network or CHP, or connecting to an existing facility.
- Number of bus passenger journeys.
- Index rate of cycle trips (at a representative number of cycling points).
- S106 contributions to green commuting.
- Number of permissions for park and ride/park and share/kiss and ride.
- Number of bus passenger journeys.

SA Objective 1b. Climate change adaptation

Proportion of planning permissions for large residential and employment developments incorporating SuDS.

SA Objective 2a. Public open space

- Quantity of open space per 1,000 people.
- Average journey time to nearest open space.
- Number of open spaces managed to Green Flag Award standard.
- Loss/gain of space used for sport and recreational uses.

SA Objective 2b. Noise

Appeals won/lost where PSP8 - Residential Amenity was a material consideration.

SA Objective 2c. Air quality

- Number of 'poor' air quality days when pollution exceeds National Air Quality Objectives.
- Annual average nitrogen dioxide levels.
- Number of monitoring sites exceeding the annual mean nitrogen dioxide objective (40 micrograms per cubic metre) in South Gloucestershire a) Total no. of monitoring sites exceeding the annual mean nitrogen dioxide objective (40 micrograms per cubic metre) in South Gloucestershire b) No. of monitoring sites exceeding the annual mean nitrogen dioxide objective (40 micrograms per cubic metre within Air Quality Management Areas.
- No. of monitoring sites exceeding the annual mean nitrogen dioxide objective (40 micrograms per cubic metre) outside AQMAs.
- Congestion reduction in the average journey time per mile in the morning peak on the Avon Ring Road.
- S106 contributions to green commuting.
- Number of bus passenger journeys.

SA Objective 2d. Access to healthcare services

- Amount of new residential development within 30 minutes (public transport) time) of a GP, hospital, primary school, secondary school, major retail centres and areas of employment.
- Number of Extra Care housing units completed.

SA Objective 3a/3b. Housing

- Net additional dwellings provided by area.
- Net additional dwellings in future years; and Managed Housing Delivery.
- New and converted dwellings on previously developed land.
- Percentage of new dwellings completed (on fully completed sites of 10+ dwellings) at: i) less than 30 dwellings per hectare, ii) 30-50 dwellings per hectare, iii) more than 50 dwellings per hectare.
- Proportions of 1, 2, 3 and 4 bed dwellings and flats built by tenure.
- Percentage of affordable housing negotiated and delivered on qualifying sites.
- Gross affordable housing completions.
- Affordable housing completions by tenure.
- Number of dwellings completed on Rural Housing exception sites.
- Housing quality Building for Life Assessments.
- Number of applications refused on design grounds.
- Net additional Gypsy and Traveller pitches.
- Vacancy rate for South Gloucestershire's authorised Gypsy/Traveller Sites.
- Number of self/custom build plots granted permission.
- Number of planning applications for rural workers dwellings approved.

SA Objective 3c/3d/3e. Access to community facilities, education and retail

Amount of new residential development within 30 minutes (public transport time) of a GP, hospital, primary school, secondary school, major retail centres and areas of employment.

- Index rate of cycle trips (at a representative number of cycling points).
- Travel to school Proportion of school pupils who travel to school via modes other than by car.
- Amount of completed retail development and proportion in town/district/local centres.
- Total primary retail frontage in town centres and proportion in A1 Use10F [See reference 1].
- Percentage of vacant A1 units in the town/district centres.
- Percentage of households within 500 metres of a food store selling basic food provisions.
- Amount of completed community facilities.
- Amount of completed leisure development and the percentage within town centres.

SA Objective 3f. Deprivation

- Worklessness: a) Unemployment International Labour Organisation (ILO) measure (official district level estimate); b) Unemployment JSA Claimant Count (sub-district level estimate).
- Number of Extra Care housing units completed.
- Amount of completed community facilities.
- Amount of completed leisure developments and the percentage within town centres.
- Number of Very Major Developments and other qualifying developments that submit Health Impact Assessments as part of a planning application.

SA Objective 3g. Digital connectivity

■ No. of permissions granted for new telecommunications infrastructure.

No. of new dwelling with access to super/ultrafast broadband.

SA Objective 4a. New employment floorspace

- Estimate of the total number of jobs (employees in employment) by sector and geographical policy area.
- Number of jobs arising from implemented planning permissions by geographical policy area.
- New employment development (floorspace and jobs) compared to the number of new residential developments in the North Fringe Policy Area.
- Number of new business start ups.
- Small business in South Gloucestershire showing business growth.
- Total amount of additional employment floorspace completed by type (use class) and geographical policy area.
- Employment land available by type.
- Losses of employment land to residential development within safeguarded areas.
- Changes in employment use classes within safeguarded employment areas by geographical policy area.
- Losses of economic development uses to residential development outside of the safeguarded areas by area.
- Total amount of floorspace for 'town centre uses'.
- New employment development in the three Enterprise Areas.

SA Objective 4b. Access to major employment areas

■ Travel to work – Proportion of workers who travel to their place of work via modes other than by private car.

New employment development in the three Enterprise Areas.

SA Objective 5a/5b. Historic environment

- Proportion of appeals dismissed where Conservation Area and/or listed buildings and/or AONB was a material consideration.
- Conservation Areas/Listed buildings/Scheduled Monuments on the at risk register.
- Appeals won/lost where planning policy relating to the historic environment was a material consideration.

SA Objective 5c. Biodiversity

- Area of SSSI lost as a result of built development.
- Improved local biodiversity active management of local sites.
- Change in areas of biodiversity importance.
- Change in priority habitats and species, by type.
- Improved local biodiversity active management of local sites.

SA Objective 5d. Landscape

Number of applications granted permission within the AONB or with potential to affect its setting.

SA Objective 5e. Green infrastructure

Number of trees given Tree Preservation Orders (TPOs).

SA Objective 5f/5g. Land use

- Amount of best and most versatile agricultural land lost to built development.
- New and converted dwellings on previously developed land.

SA Objective 5h/5i. Flood risk

- Proportion of planning permissions for large residential and employment developments incorporating SuDS.
- Number of planning permissions granted contrary to Environment Agency advice on flooding or water quality grounds.

SA Objective 5j. Water resources

Number of planning permissions granted contrary to Environment Agency advice on flooding or water quality grounds.

SA Objective 6a/6b. Waste and resources

- Production of primary land won aggregates.
- Size of landbank for crushed rock.
- Size of landbank for clay.
- Area of land affected by permissions for major built development in the Mineral Resource Areas.
- Number of planning applications granted contrary to The Coal Authority's advice.
- No. of licences granted for Hydrocarbon Extraction activity.
- No. of planning applications for Hydrocarbon Extraction activity.

Conclusions

- 1.94 The SA of the South Gloucestershire Local Plan Phase 3 document has been undertaken to accord with current best practice and the guidance on SA/SEA as set out in the National Planning Practice Guidance. SA objectives developed at the Scoping stage of the SA process have been used to undertake a detailed appraisal of the current Phase 3 document.
- **1.95** The SA of the Phase 3 consultation document builds on the SA work carried out in relation to the Phase 1 and Phase 2 consultations. The Phase 3 consultation document sets out Local Plan objectives, the scale and type of development to be planned for, potential allocations, the Emerging Preferred Strategy (and the alternative 'lenses' considered) as well as infrastructure requirements. The Phase 3 document also includes proposed policy wording in relation to topics including climate change, affordable homes, the economy and town centres.
- **1.96** Due to the overall scale of development proposed in the emerging Local Plan, adverse effects have inevitably been identified in relation to some of the SA objectives, in particular those relating to the landscape, biodiversity, cultural heritage, flood risk, land use and water. Some of these effects have the potential to be significant. However, the development proposed will meet the identified need for housing within South Gloucestershire and will stimulate economic growth. At the next stage of the SA, further consideration will be given to the cumulative effects of the Local Plan, including the policies to be saved, and in particular considering any cumulative effects on certain settlements.
- **1.97** The emerging Local Plan is aiming to achieve a balance between housing and employment growth and protecting its environmental assets. Focussing the majority of growth in the urban fringes of Bristol and the Market Towns will maximise access to jobs, services and facilities and sustainable modes of transport. While there is some development proposed in the rural areas of South Gloucestershire, this will help to maintain the vitality and viability of these areas. Where adverse effects are expected in relation to the policies, the SA

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has included recommendations for the Council to take into account at the next stage of plan-making.

Next Steps

1.98 The full SA Report and this Non-Technical Summary will be available for consultation alongside the Pre-Submission Local Plan document between December 2023 and February 2024.

1.99 Following the consultation on the SA of the Local Plan Phase 3 document, the responses received, and the findings of the SA will be considered and incorporated into the next iteration of the South Gloucestershire Local Plan.

LUC

December 2023

References

References

Please note that since the time of writing the monitoring framework in the Core Strategy (2013), Classes A1 applicable to retail has been removed and new Class E replaces it through The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

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